

Alessia Reina

Environmental vs. Industry interests

A comparative case study analysis of the lobbying of CAN Europe and FuelsEurope vis-à-vis the EU ETS Directive (2014-2018)

Master's thesis in European Studies

Supervisor: Carine S. Germond

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Abstract

Lobbying has increasingly become a significant part of the European Union (EU) decision-making process. At the same time, the EU and interest groups active at the EU level have considerably increased their focus and interest in issues related to climate change and the environment. This thesis asks how Climate Action Network Europe (CAN Europe), as a *diffuse* interest representing the environmental movement and FuelsEurope, as a *specific* interest representing the oil refinery industry, has lobbied during the EU Emission Trade System (ETS) revision for phase IV. It explores the use of lobbying strategies and tactics during the formulation and negotiation stages of the EU ETS, drawing on concepts such as inside and outside lobbying, lobbying targets, the use of the Brussels and national channels, and the lobbying of friends and foes. Further, this thesis asks to what extent the used lobbying strategies and tactics have successfully enabled the two interest groups to wield influence on the EU ETS revision. This study is done through document analysis, exploring how the two interest groups lobbied by investigating publicly available documents. This thesis contributes to a better understanding of how CAN Europe and FuelsEurope lobbied during the EU ETS revision and the effectiveness of their lobbying strategies and tactics used to wield influence. The main findings suggest that CAN Europe used a more diverse set of lobbying strategies and tactics than FuelsEurope. Further, the discoveries indicate that the lobbying strategies and tactics used by CAN Europe were more effective in wielding influence on the EU ETS than the lobbying strategies and tactics used by FuelsEurope.

Sammendrag

Lobbyvirksomhet har i økende grad blitt en viktig del av beslutningsprosessen i Den europeiske union (EU). Samtidig har EU og interessegrupper aktive på EU-nivå økt sitt fokus og interesse for spørsmål knyttet til miljø- og klimaendringer betraktelig. Denne oppgaven spør hvordan Climate Action Network Europe (CAN Europe), som en *diffus* interesse som representerer miljøbevegelsen og FuelsEurope, som en *spesifikk* interesse som representerer oljeraffineriindustrien, har drevet lobbyvirksomhet under revisjonen av EU Emission Trade System (ETS) for fase IV. Oppgaven utforsker bruken av lobbystrategier og -taktikker under formulerings- og forhandlingsstadiene av EU ETS, og trekker på konsepter som *extern-og internlobbying*, *lobbyvirksomhetsmål*, bruken av *Brussel og nasjonale kanaler*, og *lobbyvirksomhet rettet mot venner eller motstandere*. Videre spør denne oppgaven i hvilken grad de brukte lobbystrategiene og taktikkene har gjort det mulig for de to interessegruppene å ha innflytelse på revisjonen av EU ETS. Denne studien er gjort gjennom dokumentanalyse, og utforsker hvordan de to interessegruppene drev lobbyvirksomhet ved å undersøke offentlig tilgjengelige dokumenter. Denne oppgaven bidrar til en bedre forståelse av hvordan CAN Europe og FuelsEurope drev lobbyvirksomhet under EU ETS-revisjonen og effektiviteten av deres lobbystrategier og taktikk brukt for å utøve innflytelse. Hovedfunnene tyder på at CAN Europe brukte et mer mangfoldig sett med lobbystrategier og taktikker enn FuelsEurope. Videre indikerer funnene at lobbystrategiene og -taktikkene som ble brukt av CAN Europe var mer effektive til å påvirke EU ETS enn lobbystrategiene og -taktikkene som ble brukt av FuelsEurope.

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Abbreviations

CAN Europe	Climate Action Network Europe
EP	European Parliament
EU	European Union
ETS	Emission Trade System
NGO	Non-governmental organisation
NSD	<i>Norsk senter for forskningsdata</i> (Norwegian centre for research data)
Sikt	Norwegian Agency for Shared Services in Education and Research

1 Introduction

1.1 Introduction to the Topic

"Preparing the future for the next generations is exactly the magnitude of what we are doing here today and tomorrow. And I say 'we' because this process must be truly inclusive. The Commission will and cannot decide alone on the Europe's 'vision for a modern, clean, and competitive economy'. The Parliament alone will not decide. The Member States alone will not decide. Europe will collectively decide."
(European Commission, 2018)

This excerpt is from a speech made by the current Vice-President of the European Commission, Maroš Šefčovič, at the High-Level Stakeholders Consultation on the European Union's (EU) long-term strategy for reducing greenhouse gas emissions (GHG). Today, interest groups have several possibilities offered to contribute to EU policy-making, such as through organised consultations by the European Commission and giving feedback on policies during the policy-making process, to mention a few (European Commission, n.d.-a; Greenwood, 2017, pp. 34-35). In line with the EU's growing interest and development within climate change policies and legislations, the number of interest groups and lobbying activities towards the EU has increased significantly (Gullberg, 2008a, p. 2964). The large amount of resources interest groups spend on lobbying to influence EU policy indicates that lobbying is perceived as effective by interest groups (Gullberg, 2008a, p. 2964). As of 2021, the environment and climate action were two of the top three topics interest groups were interested in and are among the top priority topics within the EU (European Parliament, 2021; European Union, n.d.). Within the EU climate change policy field, the polluting industry and the environmental movement are considered the main interest groups involved (Gullberg, 2008a, p. 2966). According to the Transparency Register (TR), there are more than 12 000 interest groups registered, whereas the two most represented are in-house lobbyists and trade/business/professional associations, and non-governmental organisations (NGOs) (transparency Register, 2023e).

The EU Emissions Trade System (EU ETS) has, since its launch in 2005 until today, been promoted by the European Commission as the cornerstone of the EU's climate change policy (European Commission, 2023c; Thomas, 2021, p. 1220). Until today, the EU ETS has been revised three times since its pilot phase (2005-2007) and is now in its fourth phase (2021-2030), which was adopted in 2018 (European Commission, 2023b, 2023f). Hence, this thesis finds it interesting to investigate the lobbying of one industry and one environmental interest group vis-à-vis the revision of phase IV of the EU ETS. Accordingly, this study mainly focuses on the lobbying of two of the leading interest groups in the field of climate and energy policy: Climate Action Network Europe (CAN Europe), which represents the environmental movement, and FuelsEurope, which represents the oil refinery industry. CAN Europe and FuelsEurope are further considered relevant to investigate, considering that they can be characterised as one *diffuse* interest (CAN Europe) and one *specific* interest (FuelsEurope) (Beyers, 2004, p. 216). These

characterisations can help better to understand their lobbying behaviour towards the EU ETS revision.

To examine how CAN Europe and FuelsEurope lobbied during the EU ETS phase IV revision, this thesis applies a framework of lobbying strategies consisting of tactics, targets, and target types (i.e. friends or foes). Previous scholars have investigated the lobbying strategies and tactics of interest groups towards the EU in general (Beyers, 2004; Greenwood, 2017), towards EU climate policy (Gullberg, 2008a, 2008b), towards the EU ETS (Eikeland & Skjærseth, 2019; Miard, 2013; Thomas, 2021). Although many scholars have investigated the lobbying strategies and tactics of interest groups towards the EU ETS, there is limited study on the lobbying strategies and tactics of both the industry and environmental interests. Previous scholars have also investigated the lobbying success of interest groups in the EU (Klüver, 2011; Mahoney, 2007; Rasch, 2018). There is limited study on the extent to which lobbying strategies and tactics have been successful in influencing policy, an important exception includes (De Bruycker & Beyers, 2019). This is why, besides investigating the lobbying strategies and tactics of CAN Europe and FuelsEurope vis-à-vis the revision of the EU ETS, this thesis further investigates the extent to which the lobbying strategies and tactics have successfully enabled the interest groups to wield influence. This focus can help expand our knowledge of the role of interest groups representing the environmental movement and the oil refinery industry during the revision of phase IV of the EU ETS. In addition, it contributes to refining our understanding of the extent to which the strategies and tactics have successfully enabled the interest groups to wield influence. In other words, this thesis aims to partially unpack the black box of lobbying.

1.2 CAN Europe and FuelsEurope

To investigate the lobbying of interest groups towards the revision of the EU ETS for phase IV, this thesis takes an interest in investigating one *diffuse* and one *specific* interest group. *Diffuse* interests refer to interest groups that defend diffuse or public interests such as environment protection, future generations or consumers (Beyers, 2004, p. 216). *Specific* interests refer to interest groups that defend well-defined interests within focused constituencies which are closely connected to their members' economic, commercial, professional, and social interests. This distinction between *diffuse* and *specific* interests helps better understand how these interest groups lobby, what kind of lobbying strategies and tactics they use, and how they use them. It is assumed that diffuse interests use more *outside* strategies and tactics and less *inside* strategies and tactics than specific interests (Beyers, 2004, p. 216). *Outside (Voice)* strategies and tactics refer to public political strategies and tactics (Beyers, 2004, p. 213). *Inside (Access)* strategies and tactics refer to seeking access to political negotiating venues (Beyers, 2004, p. 213). The concepts of *diffuse* and *specific* interests and inside and outside strategies will be further elaborated in Chapter 3, presenting the conceptual framework of this thesis. This thesis considers two key interest groups that play a leading role in representing their respective interests within the EU: CAN Europe (as a *diffuse* interest) and FuelsEurope (as a *specific* interest).

CAN Europe (previously Climate Network Europe) was formed in 1989 as the first regional branch of the Climate Action Network International (Climate Action Network Europe, 2023a). Today, CAN Europe is considered the leading environmental non-governmental organisation (ENGO) active at the EU level working on climate and energy

issues (Climate Action Network Europe, 2023b; Transparency Register, 2023a). CAN Europe is a European Network consisting of over 180 member organisations from 38 European countries representing over 1700 NGOs and 47 million citizens (Climate Action Network Europe, 2023b). Their head office is in Brussels, but they also have additional offices in European countries such as Denmark, Poland, Germany, Serbia, North Macedonia, Slovenia and Turkey (Climate Action Network Europe, 2023a).

CAN Europe aims to empower organisations representing the environment movement to influence EU decision-makers and the development and design of climate change, energy and finance policy, both in the EU and within the European countries outside the EU (Climate Action Network Europe, 2023b). In this way, they strive to promote sustainable climate, development and energy policies throughout Europe in their fight against dangerous climate change (Climate Action Network Europe, 2023b). CAN Europe is recognised within EU policy and the UN climate negotiations as an established ENGO (Climate Action Network Europe, 2023b).

FuelsEurope, known initially as Europia, was formed in 1989 to represent the interests of refinery operating companies in the EU with the EU institutions (FuelsEurope, 2014a, p. 53). FuelsEurope is one of two divisions of the European Fuel Manufacturers Association, an international non-profit association (AISBL) operating in Belgium (FuelsEurope, 2022, p. 78). The association represents around 40 companies manufacturing and distributing liquid fuels and products for energy, mobility and feedstocks for industrial value chains within the European Economic Area (FuelsEurope, 2022, p. 78; 2023). In total, the member companies account for about 95% of the EU's petroleum refining capacity and around 75% of motor fuel retail sales in the EU (FuelsEurope, 2022, p. 78). The other division of the Association is Concawe which conducts research relevant to the oil industry, such as environmental, health and safety issues (FuelsEurope, 2023).

FuelsEurope aims to provide and inform expert advice about fuel manufacturing and distribution and its products to the EU institutions and other stakeholders (FuelsEurope, 2022, p. 78). Through this aim, FuelsEurope hopes to contribute to developing cost-effective and technically feasible EU legislation and policies in a constructive way (FuelsEurope, 2022, p. 78). In addition, FuelsEurope wishes to promote an understanding of fuel manufacturing and distribution and European economic, social, and technological progress and contribution amongst the EU institutions and citizens (FuelsEurope, 2022, p. 78).

Despite representing different interests (the oil industry and Environmental NGOs), both CAN Europe and FuelsEurope have climate action, energy and the environment as fields of interest in their work within the EU (Transparency Register, 2023a, 2023c). They are also considered two leading interest groups within their area of interest. CAN Europe is one of Europe's largest and most active ENGOs in EU climate change policy, and FuelsEurope represents almost 100% of the EU's oil refining capacity. Further, both CAN Europe and FuelsEurope have been engaged as key actors in the developments of the EU ETS since the Kyoto Protocol negotiations (Convery, 2009, pp. 394-395; Eikeland & Skjærseth, 2019, p. 111). In addition, both interest groups have been active during the revision of phase IV of the EU ETS and have the EU ETS listed as one of their targeted EU legislative proposals or policies (European Commission, 2015; Transparency Register, 2023a, 2023c). The EU ETS concerns CAN Europe and FuelsEurope, but in different ways. It concerns CAN Europe as it is the EU's cornerstone policy in combating climate change by reducing greenhouse gas (GHG) emissions within the EU (European Commission,

2023c). Moreover, it concerns FuelsEurope, as the oil refineries are among the energy-intensive industry sectors covered by the EU ETS (European Commission, 2023c).

1.3 The EU Emissions Trade System

The thesis will investigate the lobbying strategies and tactics of CAN Europe and FuelsEurope vis-à-vis the EU ETS revision for phase IV (2014-2018). The EU ETS revision for phase IV is chosen as the backdrop when investigating how CAN Europe and FuelsEurope lobbies, as it is considered the EU's cornerstone within climate change policy and concerns both the environmental movement and the oil refinery sector (European Commission, 2023c). The set timeframe for this thesis is based on the two stages of the policy cycle that are in focus as parts of the policy analysis. Consequently, to simplify the timeframe of this thesis, the study will investigate the time from the first consultation on the EU ETS post-2020, which was initiated on the 8th of May 2014, until the 14th of March 2018, when the EP and the Council co-signed the agreement of the revised EU ETS for phase IV (Procedure 2015/0148/COD). This is not to say that lobbying towards the EU ETS revision did not happen before or after this period. Still, it is set to make it easier to analyse the lobbying activity of CAN Europe and FuelsEurope based on the policy stages in focus. The policy stages in focus are the *formulation* and the *negotiation stages* and will further be elaborated in Chapter 4, presenting the methodology of my thesis.

The development of the EU ETS can be traced back to the Kyoto Protocol in 1997, as it was then the concept of trading emissions formally began to be official as a policy tool against climate change (European Commission, 2023b). The EU ETS is a cap-and-trade system which limits the amount of selected GHG emissions allowed by covered sectors and then allocates tradable emission allowances either through auctioning or for free to the sectors concerned (Moore & Jordan, 2020, p. 296). The cap set and the allocation of emissions to the sectors covered are done centrally by the EU (Moore & Jordan, 2020, pp. 299-300). The EU ETS has, until now, had four phases: the first phase lasting 2005-2007, phase II lasting 2008-2012, phase III lasting 2013-2020, and phase IV lasting 2021-2030 (Moore & Jordan, 2020, p. 296). The sectors covered by the EU ETS are the energy-intensive industry sectors, including oil refiners, steel works, and production of aluminium, iron, metals, lime, cement, glass, pulp, ceramics, paper, acids, cardboard and bulk organic chemicals, commercial aviation within the EEA (European Commission, 2023c). The EU ETS covers around 40% of the EU's total GHG emissions and remains the EU's main policy instrument to reduce GHG emissions and operates in all EU Member States, including the EEA-EFTA states (Norway, Island, Switzerland and Liechtenstein) (European Commission, 2023c; Stephenson & Boston, 2011, p. 6).

The 2018 revision of the EU ETS for phase IV was built on the 2008 revision of the EU ETS for phase III and has the aim to contribute to reducing 40% of EU's GHG emissions below 1990 levels by 2030 in a cost-effective way (Directive (EU) 2018/410, p. 3; European Commission, 2023f). To do this, the EU ETS covered sectors have to decrease their GHG emissions by 43% below 2005 levels from 2021 to 2030 (Directive (EU) 2018/410, p. 3). The main changes made with the 2018 revision were that the cap would decrease annually by 2.2% from 2021 to increase the pace, the Market Stability Reserve (MSR) was strengthened to reduce emission allowance surplus and make the EU ETS more resilient to future shocks (European Commission, 2023c). The method of free allowances was prolonged for phase IV concerning the sectors most at risk of relocating production outside the EU to reduce the risk of carbon leakage (European Commission,

2023c). The auctioning of allowances remained the general rulemaking the majority of allowances within the EU ETS auctioned (Directive (EU) 2018/410, p. 4). The EU ETS was jointly adopted by the European Commission, the European Parliament (EP) and the Council of the European Union (the Council) through the Ordinary Legislative Procedure (Directive (EU) 2018/410).

Previous studies of the lobbying of EU ETS have mainly been focused on the typically *specific* interests, representing the energy-intensive industries which are covered by the EU ETS (Convery, 2009; Eikeland & Skjærseth, 2019; Markussen & Svendsen, 2005; Miard, 2013; Thomas, 2021; Wettestad, 2009). But few have investigated the lobbying of both the *specific* interests representing the industry and typically *diffuse* interests defending interests such as environmental protection, exceptions include (Gullberg, 2008a, 2008b). My thesis aims to investigate this further by looking at the two cases of CAN Europe as a *diffuse* interest group and of FuelsEurope as a *specific* interest group.

In 2021 the European Commission adopted legislative proposals increasing the EU's GHG emissions reduction aim from 40% to 55% by 2030, which also increases the aim of the EU ETS (European Commission, 2023f). Since this thesis focuses on the 2018 revision of the EU ETS, the changes made after the adaptation of the EU ETS in 2018 will not be given attention.

1.4 Research Questions and Methodology

Both CAN Europe and FuelsEurope are active at the EU level representing their respective interests of the environmental movement and the oil companies within the EU institutions aiming to contribute to EU policies and legislations (Transparency Register, 2023a, 2023c). This thesis thus explores how CAN Europe and FuelsEurope lobby towards the EU institutions (the EP, the European Commission, and the Council). To do this, this thesis focuses on the lobbying strategies and tactics used by CAN Europe and FuelsEurope when lobbying towards the revision of the EU ETS for phase IV. Therefore, this thesis raises two sets of questions:

- (1) *What lobbying strategies and tactics have CAN Europe and FuelsEurope used when lobbying towards the revised EU ETS Directive 2018?*

To answer this first research question, this thesis will do a qualitative document analysis of public documents, mainly from EU public documentation from public consultations and stakeholders' input on legislative proposals, the websites of CAN Europe and FuelsEurope such as reports, position papers (Tjora, 2018, p. 182). Further, this thesis investigates whether the lobbying strategies and tactics used by CAN Europe and FuelsEurope towards the revised EU ETS have successfully enabled the interest groups to wield influence on the 2018 revised EU ETS during the formulation and decision-making(/negotiation) stage of the legislative process. Therefore, this thesis asks the following:

- (2) *To what extent have these lobbying strategies and tactics been successful and enabled the two interest groups to wield influence on the *formulation and decision-making(/negotiation) stage of the legislative process?**

To answer this second research question, this thesis will investigate to what extent the lobbying strategies and tactics used by CAN Europe and FuelsEurope have successfully

enabled these interest groups to wield influence on the EU ETS revision for phase IV. This will be done by addressing some factors for measuring the success of the lobbying strategies and tactics used, which are chosen based on previous literature and the theoretical framework presented in Chapter 3 (see Table 1, p. 19). The factors in focus are the formal and informal meetings with EU officials; the amount of outside strategies and tactics used; lobbying during the formulation and the negotiation stages of the EU ETS revision; the number of personnel and financial resources; the use of inside and/or outside strategies and tactics; the use of the Brussels and national channel; lobbying alone, in homogeneous and/or heterogeneous coalitions; and lastly, the lobbying of friends and foes. These factors used to measure success will further be presented in Chapter 4. The thesis will also compare the lobbying strategies and tactics used by CAN Europe and FuelsEurope to see whether the strategies and tactics used have been successful and enabled the interest groups to wield influence during the EU ETS revision. This thesis will further focus on the formulation and negotiation stages of the legislative process by drawing on the policy cycle as a concept.

1.5 Lobbying Strategies and Tactics, and Lobbying Success: Definitions

This thesis will study the lobbying strategies and tactics used by CAN Europe and FuelsEurope and their lobbying success vis-à-vis the revision process of the EU ETS for phase IV (2021-2030). It is, therefore, critical to define these terms.

Lobbying as a term is highly charged as it is perceived differently throughout the EU Member States and beyond (Greenwood, 2017, p. 1). This was proved during the consultation of the 2006 European Transparency Initiative Green Paper as respondents expressed scepticism towards using the word lobbying as it could have negative connotations (European Commission, 2008). The European Commission, therefore, used the term interest representation instead of lobbying but kept the same definition (European Commission, 2008). In the latest agreement of the Transparency Register adopted in 2021, the European Commission defines interest representation (lobbying) as:

This thesis shall use the European Commission's definition of *Lobbying*:

"Activities ... carried out by interest representatives to influence the formulation or implementation of EU policy or legislation, or the decision-making processes of the signatory institutions or other EU institutions, bodies, offices and agencies" (European Commission, 2021).

Considering the definition mentioned above, lobbying strategies can further be interpreted as a combination or a collection of tactics and activities for the lobbyists to reach their lobbying goal (Johansson & Scaramuzzino, 2019, p. 1530). To examine how CAN Europe and FuelsEurope lobbied towards the revision of the EU ETS phase IV, a framework of lobbying *strategies* consisting of tactics, targets, channels, and target types will be used. This thesis will investigate strategies and tactics such as the channels (i.e. the Brussels and the national channel) and targets (i.e. the European Commission, the EP and the Council) (Greenwood, 2017), inside/outside (Beyers, 2004) and friends/foes (Gullberg, 2008a). In addition, this thesis will investigate the groups' lobbying, for example, whether they lobbied alone or in coalitions, whether they had personal or formal contact with the decision-makers, what kinds of arguments or information they

used, and their use of letters, petitions, motions in EP, etc. Further, the concepts of *diffuse* and *specific* interests will be used to understand better the lobbying behaviour of CAN Europe (*diffuse* interest) and FuelsEurope (*specific* interest). Chapter 3 of this thesis will further elaborate on these concepts, presenting the conceptual framework.

Further, to analyse the success of a lobbying strategy and tactic, this thesis will establish what is meant by success. Success can be defined as “the extent to which the policy objectives of an interest group are realised” (De Bruycker & Beyers, 2019, p. 58). Further, I will refer to success as the extent to which the lobbying strategies and tactics enable interest groups to gain influence on the EU policy process. How I aim to measure the success of the used lobbying strategies and tactics will be further elaborated in Chapter 4.

1.6 Outline of the Thesis

In the following chapters, this thesis will first present a literature review to see what previous research has done and how this thesis contributes further to the existing literature. Then in Chapter 3, the concepts within lobbying strategies and tactics will be presented in the conceptual framework of this thesis, followed by Chapter 4, presenting the method used. Chapters 5 and 6 will present the results and analysis of the lobbying strategies and tactics used towards the 2018 revised EU ETS by both CAN Europe and FuelsEurope will be presented. In Chapter 7, the lobbying strategies and tactics used by CAN Europe and FuelsEurope will be compared to see whether the strategies and tactics used have been successful and enabled the interest groups to wield influence during the formulation and decision-making(/negotiation) stage of the legislative process, and if so why and how. Finally, Chapter 8 will present the conclusions of this thesis.

2 Literature Review

In line with the rapidly increased number of interest groups and lobbying activities towards the EU during the last 30 years, the amount of literature on lobbying the EU has also grown to become one of the most researched matters on the European scene (Versluis et al., 2011e, p. 47). Further, the environment and climate change are among the most important and salient topics at the EU level (European Parliament, 2021; European Union, n.d.). This thesis aims to investigate the lobbying of CAN Europe and FuelsEurope vis-à-vis the revision of the EU ETS phase IV. Consequently, this chapter sets out to critically assess the literature in the field of lobbying the EU ETS, with a focus on the lobbying of CAN Europe and FuelsEurope. Firstly, the literature on the lobbying of the EU ETS will be reviewed. Secondly, literature on CAN Europe and FuelsEurope will be reviewed. Finally, the literature on CAN Europe's and FuelsEurope's lobbying of the EU ETS will be reviewed.

2.1 Lobbying the EU ETS

This sub-chapter will focus on literature about the general lobbying of interest groups towards the EU ETS. It shows that the main focus has been on the lobbying strategies and tactics of industry interests, also called *specific* interests, when investigating the lobbying towards the EU ETS (Miard, 2013; Thomas, 2021; Wettestad, 2009). This indicates that there is an underrepresentation of *diffuse* interests, such as Environmental NGOs, when investigating the lobbying towards the EU ETS. Further, the literature review illustrates the academic interest in lobbying strategies, tactics, and targets such as lobbying channels, targets and coalitions (Miard, 2013; Thomas, 2021), in addition to the use of the concepts of *diffuse* and *specific* interests to explain how interest groups' lobbies (Wettestad, 2009). These lobbying methods and concepts will be studied more closely in my thesis.

Building on studies done on the lobbying of the EU ETS, Miard (2013) investigates how six different industrial firms from Norway and Sweden lobby during the revision of the EU ETS for phase III (2013-2020) by focusing on their lobbying tactics and targets. It is further argued that their lobbying approach has been influenced by whether the firms originate from an EU Member State or a non-EU Member State (Miard, 2013, p. 73). The lobbying tactics in focus are whether the firms lobby alone or in alliance and whether they lobby through national or European associations (Miard, 2013, p. 75). While the lobbying targets in focus are the European Commission, the European Parliament, and the Council of the European Union. National institutions are further considered as lobbying tactics, targets, or both. This thesis will take inspiration from the mentioned lobbying tactics and targets in focus, as they are relevant for investigating the lobbying of CAN Europe and FuelsEurope. Miard (2013, p. 83) finds that all firms examined considered their respective EU associations as one of the most important tactics and was further considered more important by the Norwegian firms than by the Swedish firms. This could indicate that the firms concerned perceived lobbying through EU associations as successful in wielding influence. This further vindicates the relevance of EU

associations, such as FuelsEurope, and their lobbying towards the EU ETS, as this thesis will investigate.

Another study investigates how European steelworkers' trade unions engage vis-à-vis the revision of the EU ETS' fourth phase as a case study (Thomas, 2021). Further, this study investigates whether intraorganizational bargaining between trade unions and employers and non-governmental organisations (NGOs) influenced the lobbying strategies and the intraorganizational decision-making process of trade unions in the context of the EU ETS revision (Thomas, 2021, p. 1218). This is done by analysing the following three levels in which the trade unions engage with the EU ETS; (1) the cross-sector level, (2) the sector level and (3) the company level, with a focus on their positions and strategy coalitions (Thomas, 2021, p. 1220). This is pertinent for this thesis which looks at forming coalitions or lobbying alone as lobbying strategies. The main findings of this study show that intraorganizational negotiation with NGOs and with employers, to a greater degree, shaped the priorities of trade unions (Thomas, 2021, p. 1218).

Further, Thomas (2021) finds that at the cross-sector level, the European Trade Union Confederation (ETUC), lobbies in coalition with environmental interest groups, such as CAN Europe and the European Environmental Bureau (EEB), to strengthen their lobbying position towards the EU on the issue of the EU ETS (Thomas, 2021, p. 1223). At the sector level, IndustriAll Europe lobbied in coalition with the European steel employers' organisation, Eurofer, towards the revision of the EU ETS (Thomas, 2021, p. 1225). While at the company level, the steel company, ArcelorMittal, lobbied towards the EU ETS through European employers' umbrella organisations such as Eurofer and BusinessEurope (Thomas, 2021, p. 1228). Based on its findings, the study argues that lobbying coalitions are more likely to be successful if the coalition consists of a wide range of allies than if it consists of organisations with similar interests (Thomas, 2021, p. 1231). This finding is regarded as relevant to further investigate in my thesis.

Additionally, a study by Wettestad (2009) investigates why the energy-intensive industries came out relatively better than the power producers in the proposal for the revised EU ETS for phase III (2013-2020) compared to previous phases where they had been treated similarly. Wettestad (2009, p. 310) adopts a multi-level explanatory approach focusing on the global, EU and national levels to explain the changes in the treatment of the power producers and the energy-intensive industries in the revision of the EU ETS proposed in 2008. By doing this, the study focuses on the lobbying channels looking at how the energy-intensive industries might have influenced the EU ETS revision through the national, EU and global levels. The focus on lobbying channels will be relevant to study closer in my thesis.

Further, this study also categorises the energy-intensive industry as *specific* interests and adds the following assets connected to this type of interest: (1) that most *specific* interests gain more insider status due to their economic strength and importance, (2) the success of a *specific* interest to influence policy depends on their ability to provide expertise and knowledge on specific issues and to uphold this positive reputation as a provider of reliable information, (3) lastly, *specific* interests are thought of having both a good reputation and access to critical national and EU bodies through good allies and contacts (Wettestad, 2009, p. 311). Based on these assets, Wettestad (2009, p. 312) argues that the reason for the success of the energy-intensive industries with the proposal for the revised EU ETS was due to their improved asset "score" at both the national and the EU level. The argument stating that the success of the energy-intensive

industries vis-à-vis the revised EU ETS was due to their improved asset “score” at the EU level was the argument most supported by the findings of this study (Wettestad, 2009, p. 317). It is further argued that due to being more vulnerable to global competition, the energy-intensive industry gained its argumentative power at various levels of influence (Wettestad, 2009, p. 312). This thesis aims to build on the distinction between specific and diffuse (or general, as named in this study) with a further focus on the lobbying of both one *specific* and one *diffuse* interest.

2.2 CAN Europe and FuelsEurope

This sub-chapter will focus on literature about the general lobbying of CAN Europe and FuelsEurope. Previous literature has taken an interest in the internal structure of the Climate Action Network (CAN) (Duwe, 2001), in the conditions of which CAN is given attention by government representatives and decision-makers during international negotiations (Rietig, 2016) and in the lobbying of CAN Europe (previously Climate Network Europe) towards EU’s climate policy (Gullberg, 2008a, 2008b; Vítčá, 2008). Few have investigated the lobbying of CAN Europe towards the EU ETS. Exceptions include (Convery, 2009; Skjærseth & Wettestad, 2010). However, these studies did not focus on CAN Europe specifically but rather as a part of their analysis of environmental NGOs' overall lobbying in relation to the EU ETS. Further, previous literature has taken less interest in FuelsEurope (previously named Europaia) than CAN Europe. Bearing this in mind, previous literature has examined the lobbying of FuelsEurope both in the context of the EU climate policy (Gullberg, 2008a, 2008b), and in the context of the EU ETS (Eikeland & Skjærseth, 2019; Markussen & Svendsen, 2005).

A study done by Rietig (2016, p. 269) investigates when and under what conditions (i.e. the lobbying strategies) government representatives and decision-makers give attention to NGOs' contributions aiming to influence, with a focus on CAN. To do this, Rietig (2016, p. 270) applies the case of the UN Framework Convention on Climate Change (UNFCCC) negotiations from 2009-2012, focusing on the 2009 Copenhagen Conference. The focus on lobbying during the negotiations is something my thesis will study closer as one of the five stages of the policy cycle analysis, in addition to studying the formulation stage as well. When investigating the lobbying strategies of CAN, Rietig (2016, pp. 272-276) focuses primarily on inside/outside lobbying and the lobbying of *friends* and *foes*, but also on targets (whom they target when lobbying) and channels (lobbying through national and international level). These lobbying strategies and targets are something my thesis aims to study closer. Rietig (2016, p. 277) argues that NGOs are more likely successful in influencing the negotiations when they provide input to the decision-makers early on (inside lobbying). It is further argued that large-scale public pressure through high media coverage and demonstrations influences negotiation outcomes (outside lobbying). Finally, it is argued that lobbyists are more likely to influence when lobbying friends rather than foes through forming close relations with decision-makers. The study concludes that all arguments could be confirmed through the findings. These findings are regarded as relevant and are something my thesis aims to look further into.

Another study focusing on CAN Europe by Vítčá (2008) investigates the lobbying for the elaboration of the European Climate Control Package (ECCP) and the ratification of the Kyoto Protocol with a focus on Climate Network Europe (CNE, later named CAN Europe). This is done by investigating the lobbying strategies of CNE and the connected results. The study finds that CNE lobbied actively by participating in work groups formed by the

European Commission, providing expert information, forming coalitions, organising campaigns within EU member states, and by targeting the European Commission, EP and the Council (Vîtcă, 2008, pp. 108-109). Similar to Vîtcă (2008), my thesis sets out to investigate the lobbying strategies used by CAN Europe. However, my thesis will also investigate the lobbying tactics used. It is further argued, based on the findings, that the European Commission is the EU institution most accessible to interest groups, whereas the Council is the most challenging institution to influence (Vîtcă, 2008, p. 110). It is also argued that being able to influence the European Commission during the formulation could be more beneficial for interest groups, as the chances to influence the proposal once formulated are very slim in comparison (Vîtcă, 2008, p. 110). My thesis will study further focus on the formulation stage of the policy process in addition to the negotiation stage.

Moreover, Gullberg (2008a, 2008b) has written two articles focusing on the lobbying of interest groups representing the environmental movement and the business/industry towards the field of the EU climate policy. Both CAN Europe and FuelsEurope are among the interest groups investigated in these two articles, which is found relevant as my thesis will investigate these interest groups further. In one study, Gullberg (2008a, p. 2964) investigates to what extent and under which conditions interest groups lobby their friends or foes when attempting to influence EU climate policy, then also looking at their motives for lobbying friends and/or foes. The article focuses on the lobbying strategies of both environmental organisations and business and industry organisations (Gullberg, 2008a, pp. 2966-2967). Further, this article finds that the interest groups investigated lobby both friends and foes, but under different conditions (Gullberg, 2008a, p. 2964). Interest groups lobby both friends and foes when it comes to general policy decisions, future policy decisions and decision-makers views on a policy field (Gullberg, 2008a, pp. 2964-2965). Regarding specific policy decisions, interest groups mostly lobby their friends, but it is found that business organisations also tend to lobby their foes on specific policy decisions, as a friend on one issue might be a foe on another issue (Gullberg, 2008a, p. 2964). My thesis aims to investigate the lobbying of friends and foes further.

The other study by Gullberg (2008b, p. 161) investigates the lobbying behaviour of business and environmental organisations in the field of EU climate policy, focusing on why their lobbying behaviour differs using a simple rational choice model as a heuristic device. This article thus contributes to knowledge on when it is rational to lobby and to bring a more long-term and general focus (Gullberg, 2008b, p. 162). Gullberg (2008b, pp. 163-164) identifies the business and industry, and the environmental organisations as the two main groups of stakeholders in EU climate policy. This was of inspiration when choosing the two cases for my thesis. This study finds that the industry/business lobbies more than rationally considered and that the environmental organisations lobby less than rationally considered according to the rational choice model used. Gullberg (2008b, pp. 172-173) further argues that over-lobbying might not be a problem as it could be considered rational in the longer term, while for environmental organisations, it makes sense that they under-lobby as they have more constrained budgets.

2.3 CAN Europe, FuelsEurope and the EU ETS

This sub-chapter will focus on literature about the lobbying of CAN Europe and FuelsEurope vis-à-vis the EU ETS in general. The literature review shows that there is

little literature on the lobbying of CAN Europe and/ or FuelsEurope vis-à-vis the EU ETS. The most relevant article found was the one by Eikeland and Skjærseth (2019) which investigated the response strategies of individual companies and their affiliated associations to the evolution of the EU ETS, which focused on FuelsEurope. Further, there were found studies investigating the changes and development of the EU ETS since its initial proposal in the early 2000s until the revision of the EU ETS adopted in 2018 (Convery, 2009; Markussen & Svendsen, 2005; Skjærseth & Wettestad, 2010). Although these do not investigate how the interest groups lobbied the EU ETS specifically, they investigate the influence the interest groups representing the industry and the environment movement have had on the policy process by looking at the changes and development of the EU ETS. This implies that both FuelsEurope and CAN Europe are considered influential on the EU ETS. However, this literature review shows a lack of studies investigating how and who CAN Europe and FuelsEurope lobbied when lobbying the EU ETS. My thesis aims to partially fill in this vacuum.

A study by Eikeland and Skjærseth (2019) analyses the response strategies of individual companies and their affiliated associations, representing the petroleum and electric power supply industries, to the evolving EU ETS. (Eikeland & Skjærseth, 2019, pp. 105-106). The two European associations in focus in this article are FuelsEurope, which represents the petroleum industry, and Eurelectric, which represents the power industry. Further, Eikeland and Skjærseth (2019, p. 104) distinguish between "proactive" (potential leaders) and "reactive" (potential laggards) corporate strategies emerging from political responses to the initial proposal and following revisions of the EU ETS and adaptation in the market through action to reduce carbon emissions in the short and long term. Then by looking at phases I-IV of the EU ETS, this article compares the corporate responses to the EU ETS, focusing on the petroleum and electric power industries (Eikeland & Skjærseth, 2019, pp. 105-106). The findings of this article show that FuelsEurope had gone from reluctant support to more willing support towards the EU ETS but that they simultaneously lobbied against making the EU ETS more stringent (Eikeland & Skjærseth, 2019, p. 115). Whereas Eurelectric had, since the initial proposal of the EU ETS, increasingly supported future revisions making the EU ETS more stringent. Through these findings, Eikeland and Skjærseth (2019, p. 104) argued that the reactions between the two industries have increasingly diverged, whereas the power industry had become more proactive in their responses than the petroleum industry, which remained proactive in their responses.

Another study by Markussen and Svendsen (2005) investigates whether the first final EU ETS proposal adopted in 2003 can be explained by potential industry interest *winner*s and *loser*s involved in the policy process of the EU ETS. This study analyses the influence of these European industry interest groups by comparing their positions on the initial proposal in 2000 with the final directive adopted in 2003, and it also identifies *winner*s and *loser*s among the interest groups included (Markussen & Svendsen, 2005, p. 246). Among the dominant industry interest groups in focus, this study investigates the refining industry represented by Europia (later FuelsEurope). The study finds that the final design of the EU ETS proposal could not be explained by the potential industry winners or losers, but that the industry represented by Europia to some extent could be considered as *loser*s (Markussen & Svendsen, 2005, pp. 252-255). This study is relevant as it investigates the influence of lobbying by comparing the initial EU ETS proposal with the final EU ETS proposal. However, this study does not investigate how these interest groups lobby, which this thesis argues is an essential part of understanding the influence lobbying has on the EU policy process. Therefore, in addition to taking the positions of

the interest groups into consideration, this thesis will further focus on the lobbying strategies and tactics used and the extent to which these lobbying strategies and tactics are successful in wielding influence on the policy process.

In addition, Convery (2009, pp. 395-396) explores the origins and the development of the EU ETS from the Kyoto Protocol signed in 1997, arguing that the Kyoto Protocol was fundamental for the shaping of the EU ETS. Convery (2009, p. 395) further identifies key actors (EU institutions, EU member states, interest groups and individuals) that were considered essential for the development of the EU ETS. Whereas CAN Europe was among the mentioned key actors representing Environment NGOs, which is one of the interest groups that will be studied further in my thesis. This study is pertinent as it goes through the developments of the EU ETS from the initial proposal in 2000 and through the two following phases of the EU ETS and identifies critical actors that have been influential during this period. However, I would argue that it is important to investigate how key interest groups have attempted to influence the EU ETS to understand better how these interest groups obtain influence. This is why my thesis aims to study this closer, to understand better how key interest groups, CAN Europe and FuelsEurope, have lobbied the EU ETS.

Similarly to the study by Convery (2009), Skjærseth and Wettestad (2010) focus on the developments of the EU ETS. The two authors aim to both assess and explain the changes of the EU ETS revision for phase III (2013-2020) in comparison to the two previous phases (2005-2007) and (2008-2012) (Skjærseth & Wettestad, 2010, p. 102). To do this, they focus on the role and importance of EU member states, non-state actors, EU institutions as actors and arenas, and the international climate regime. They use three explanatory theories, Intergovernmentalism, Multi-level governance and international regime approach, to present complementary explanations of the changes of the EU policymaking, with emphasis on the EU ETS, during 2003-2009 (Skjærseth & Wettestad, 2010, p. 103). When explaining the changes of the EU ETS through Multi-level governance, the study investigates the possible influence of interest groups, then specifically ENGOs (among them being CAN Europe) and industry interests (Skjærseth & Wettestad, 2010, pp. 111-112). Skjærseth and Wettestad (2010, p. 111) further recognise the influential power of the industry and ENGOs despite them not having formal decision-making power. This strengthens my argument for choosing one ENGO and one industry interest as cases in my thesis. While Skjærseth and Wettestad (2010) attempt to explain the changes of the EU ETS throughout the three first phases by identifying key actors and their positions. I argue that one must also investigate how and whom interest groups lobbied to understand the development of the EU ETS better. Which is something my thesis aims to investigate further.

3 Conceptualising Lobbying Strategies and Tactics

This chapter will present a framework of lobbying strategies, tactics, and targets used to investigate the lobbying of CAN Europe and FuelsEurope during the revision of the EU ETS for phase IV. The framework of lobbying strategies, tactics and targets are, by inspiration, drawn from previous studies investigating how interest groups lobbies (Beyers, 2004; Chalmers, 2013; De Bruycker & Beyers, 2019; Greenwood, 2017; Gullberg, 2008a; Miard, 2013; Rietig, 2016; Thomas, 2021; Wettestad, 2009). Drawing inspiration from these studies, my thesis aims to take this further and present a framework of lobbying strategies, tactics, and targets, to make a more accessible overview of the lobbying strategies, tactics, and targets in focus. An overview of the conceptual framework can be seen in Table 1 below. The strategies, tactics and targets in this thesis are chosen based on previous literature and are not meant to say that there are no other strategies or tactics that CAN Europe and FuelsEurope have used. This selection and distinction between strategies, tactics, and targets are made to make it easier to understand and investigate how CAN Europe and FuelsEurope lobbied for the EU ETS revision and to assess the extent of success further these lobbying strategies and tactics have been wielding influence on the policy process. Consequently, this chapter sets out to first present the concepts of *diffuse* and *specific* interests. Further, the lobbying strategies and the following tactics and targets in focus for the analysis of this thesis when investigating the lobbying of CAN Europe and FuelsEurope vis-à-vis the revision of the EU ETS will be presented.

3.1 Diffuse and Specific Interests

This thesis is interested in investigating the lobbying of one *diffuse* (CAN Europe) and one *specific* (FuelsEurope) interest group vis-à-vis the EU ETS revision adopted in 2018. *Diffuse* interests refer to interest groups that defend public or diffuse interests connected to general and broad parts of society, such as future generations or consumers (Beyers, 2004, p. 216). Therefore, in socioeconomic terms, they lack a well-outlined and focused constituency. *Specific* interests refer to so-called *producer* or *socioeconomic* interest groups who defend well-defined interests within their focused constituencies due to their apparent involvement in production. Therefore, the interests defended by specific interests are closely connected to their members' economic, commercial, professional, and social interests. This distinction between *diffuse* and *specific* interests can help better understand the different use of lobbying strategies and tactics.

For *diffuse* interests, it is assumed they are disadvantaged in their efforts to influence the policy process because of their weak structure. Therefore, they have more difficulties gaining access and engaging in the policy networking (Beyers, 2004, p. 216). Because of this, *diffuse* interests have to use outside strategies, such as *protest politics* and *information politics*, to compensate. In addition, it is assumed that *diffuse* interests struggle to mobilise and become noticeable because of the diffuseness of their issues.

Consequently, the matters advocated often go beyond private needs and are sensitive to personal values, ideological views, or public concerns. *Diffuse* interests attract supporters by expressing pursued views and values and focusing on controversies to attain media attention to build a perception that they are a wide-spread mobilised group that defends valuable public interests and goods (Beyers, 2004, pp. 216-217).

Unlike *diffuse* interests, *specific* interests are assumed to be at an advantage in their efforts to influence the policy process due to their well-defined structure and solid capacity to acquire and provide resources and expertise connected to specific policy issues and sectors (Beyers, 2004, p. 217). This is reinforced by the assumption that they are experienced in realising their objectives by engaging within the decision-making arena. In addition, both their promising membership structure and well-defined size and identity make *specific* interests less needy than *diffuse* interests of public campaigns.

In sum, it is assumed that *diffuse* interests use outside strategies and tactics more than inside strategies and tactics and that the opposite is presumed for *specific* interests. Outside and inside strategies and tactics will be further presented in the sub-chapters below, presenting the lobbying strategies, tactics, and targets.

3.2 Lobbying Strategies, Tactics, and Targets

This sub-chapter will present the strategies, tactics, and targets in focus of this thesis. The chosen lobbying strategies, tactics, and targets are the following: inside (access), outside (voice) strategies, channels (how they lobby), targets (whom they lobby), friends and foes (types of targets). An overview of the lobbying strategies, tactics, and targets is presented in Table 1.

3.2.1 Inside (Access) and Outside (Voice) Lobbying

Beyers (2004) defines voice (inside lobbying) and access (outside lobbying) as two different strategies to influence EU policymaking. The distinction between voice and access strategies is made to understand better how interest groups convey information to decision-makers (Chalmers, 2013, pp. 42-43). Where voice is referred to as public political strategies, such as protests or media campaigns, access is referred to as inside lobbying in venues where decision-making takes place (Beyers, 2004, p. 213). Inside lobbying is further defined by Beyers (2004) as "*the exchange of policy-relevant information with public officials through formal and informal networks*". This exchange of information happens directly between interest groups and policymakers. It takes place in decision-making venues such as technical committees, advisory bodies, agencies, and parliamentary committees to some extent, which is, if not entirely, partially invisible to the public audience. Access to these venues implies that interest groups can deliver credible and valid expertise (Beyers, 2004, p. 214). Unlike outside lobbying, inside lobbying gives an advantage when exchanging technical and operational information, as exchanging such information is less suited through public political strategies (Beyers, 2004, pp. 213-214). Further, inside strategies are considered to be less expensive to execute and cause less reputational costs than outside strategies does (Chalmers, 2013, p. 43).

Outside strategies occur in the public sphere, whereas information is exchanged indirectly from interest groups to policymakers (Beyers, 2004, p. 214). Such public arenas make communication among policymakers, interest groups and citizens visible to a broader audience (Beyers, 2004, p. 213). Here, interest groups try to attract the wider public's attention and report on political campaigns. As there are only so many words that could fit on a protest parole, in a speech or television interview, public arenas are less suited for communicating technical information (Beyers, 2004, p. 214). Therefore, outside strategies force interest groups to prioritise the information in a way that fits their values. In other words, outside strategies are primarily used to communicate these values publicly.

Further, Beyers (2004) presents *information politics* and *protest politics* as the two different ways voice strategies occur. Information politics is "*the public presentation of information at strategic decision points*", which are not necessarily meant to reach out to a broad public but rather to reach key policymakers or specialised constituencies outside the decision-making arenas (Beyers, 2004, p. 214). Press conferences during EP debates and op-ed articles in newspapers are examples of tactics connected to information politics strategy. Whereas protest politics also includes the public presentation of information, it is separated from information politics in a way that it aims to attract attention and increase salience and conflict through the explicit staging of events. Letter-writing campaigns and organised demonstrations are examples of the connected tactics which aim to convince public decision-making officials that there are communities that support the mobilised position that takes place (Beyers, 2004, pp. 214-215). Through this, protest politics not only aims to convince public officials about existing opposition or support but also to leave them with an impression (Beyers, 2004, p. 215).

3.2.2 Lobbying Channels and Targets

Because the nature of EU decision-making is both fragmented and multi-levelled, interest groups are assumed to use different lobbying routes, also called lobbying channels, to influence the EU policy process (Greenwood, 2017, p. 26). Greenwood (2017) presents two lobbying channels: the *national* and the *Brussels* channel. Using the national channel refers to engaging in EU decision-making through national structures. In contrast, the use of the Brussels channel refers to engaging directly with the EU institutions, whether through collaborative networks at the EU level or alone. This indicates that an interest group uses the national channel when aiming to influence EU decision-making through a national institution or organisation. While an interest group uses the Brussels channel when seeking to influence EU decision-making by directly approaching the EU institutions. It is further assumed by Greenwood (2017, p. 27) that the interest groups in favour of the European integration process are more likely to use the Brussels channel, while those interest groups opposing further European integration are more likely to use the national channel of influence. Although, most interest groups who find themselves considerably affected by EU policy are assumed to use both the national and the Brussels channel, which indicates that these lobbying channels are not of a mutually exclusive nature (Greenwood, 2017, pp. 26-27). Considering that FuelsEurope represents an industry sector which the EU ETS covers, they are, according to this assumption, likely to use both the national and the Brussels channel. The same can be assumed for CAN Europe as the EU ETS is considered the EU's central policy to tackle climate change, which is an issue of focus for CAN Europe.

Whether interest groups lobby through the national channel depends on the roles of the member states within EU decision-making, the extent to which it provides access at a convenient point, and the nature of the positions being taken (Greenwood, 2017, p. 28). Influencing through the national channel is most suitable in *high politics* venues such as inter-state discussions during treaty negotiations and strategy direction via the Council. According to Greenwood (2017), the so-called social partners (civil society players, also considered as *diffuse* interests) have achieved the most access to inter-state decision-making in the EU. Alongside the Council, the European Commission and the European Central Bank, these social partners participate in the macroeconomic dialogues. Further, social partners participate in both social summits and informal initiations at the EU level (Greenwood, 2017, pp. 28-29). A similar type of arrangement before the Environmental Council meetings is enjoyed by Environmental NGOs (Greenwood, 2017, p. 29). Further, the Council's self-perception of being an institution where no lobbying occurs and their ambivalence concerning participation in the Transparency Register (TR) have made the Council a challenging EU institution to lobby. Consequently, for these reasons, interest groups have preferred to lobby through the EU member states, hence choosing the national channel.

The development of the regulation of interest groups' engagement with the EU institutions, in addition to more power being shifted to supranational decision-making in line with treaty changes, has, over time, moved the mode of operation to the Brussels channel (Greenwood, 2017, p. 32). In this thesis, the European Commission and the EP are arguably the most relevant targets through the Brussels channel. The European Commission make, in everyday policymaking, regular interactions with interest groups due to their role in drafting and initiating legislation, policing EU legislation and external representation (Greenwood, 2017, p. 34). This interaction indicates a two-way dependency, where the European Commission needs technical and issue-specific information on one side and where interest groups aim to influence the policymaking process on the other side. To avoid this two-way dependency leading to a democratic legitimacy deficit, the European Commission has adopted several procedures guided by the principles of pluralisation and transparency. The EP, one of two legislative institutions in the ordinary legislative procedure (OLP), finds itself less dependent on the supply of information from single interest groups than the European Commission, as the EP are able to pluralise information input through advisors and assistants (Greenwood, 2017, p. 41). This and the democratic foundations of the EP could be why the EP historically has been known for defending *diffuse* interests, aiming to be perceived as the people's champion.

Closely related to the lobbying channels are the lobbying targets. The revision of the EU ETS Directive for phase IV (2021-2030) was decided through the process of the OLP, also known as the co-decision procedure (Rasch, 2018, p. 8). In this procedure, the European Commission initiates the legislative acts and collaborates closely with the Council and the EP, which share decision-making power under the OLP. Consequently, all these three EU institutions involved are potential targets for interest groups to influence the decision-making process of the EU ETS revision. In addition to targeting these three EU institutions, interest groups can also target national institutions to ensure their interests are brought further to EU institutions through national politicians and officials (Miard, 2013, p. 75). Additionally, as mentioned above, due to the difficulty in lobbying the Council, interest groups tend to lobby through EU member states in order to influence the Council. In this thesis, the attempt to influence the EU institutions indirectly through the EU member states is considered a tactic rather than a target. It is regarded as

connected to lobbying through the national channel. In sum, the lobbying targets in focus of the analysis in this thesis will be the European Commission, the Council, and the EP.

Further, based on the lobbying channels and targets presented, since both CAN Europe and FuelsEurope are interest groups organised at the EU level, they will most likely use the Brussels channel more than the national one. Additionally, the concepts of *specific* and *diffuse* interests and inside and outside strategies can be connected to understanding the use of lobbying channels and targets. The capability of an interest group to deliver technical and operational information is considered to lead to more access to the European Commission, as they often need such information to execute their apolitical and technocratic functions (Chalmers, 2013, p. 49). This type of capability is considered something *specific* interests have. In comparison, the capacity to provide information about the social impacts of an EU policy is regarded as leading to more access to the EP, as such details serve as beneficial for their functions as a public arena for political debate and as one of two legislative institutions. Which is a capability that *diffuse* interests are considered to have. Consequently, we can assume that FuelsEurope, as a *specific* interest, will find it easier to target the European Commission and more challenging to target the EP than CAN Europe as a *diffuse* interest and that the opposite goes for CAN Europe (Greenwood, 2017, p. 41).

The channels and targets are understood as part of the lobbying strategy consisting of tactics such as lobbying alone, lobbying in a coalition, lobbying through other interest groups, and lobbying through EU member states. This interpretation is based on previous literature on the lobbying of interest groups, which also investigates such tactics (De Bruycker & Beyers, 2019; Miard, 2013; Thomas, 2021).

3.2.3 Lobbying Friends and Foes

Gullberg (2008a) presents the concept of *friends* and *foes* as part of interest groups' lobbying strategy with two contradicting assumptions. The first assumption states that interest groups are most likely to lobby policymakers with positions similar to their own, referred to as their friends, to influence the policy process (Gullberg, 2008a, p. 2965). The second assumption states that interest groups are most likely to lobby policymakers with positions different from their own, referred to as their foes, to change their minds and further influence the policy process (Gullberg, 2008a, p. 2966). As the field of EU climate policy does not form a single cleavage but rather several cross-cutting cleavages, whether one is a *foe* or *friend* differs depending on the specific climate policy issue at stake.

Further, (Gullberg, 2008a) finds that within the field of climate policy, interest groups lobby both *friends* and *foes*, but they do so under different conditions. When it comes to single policy decisions, it is found that interest groups representing the environment movement and the business/industry prefer lobbying their *friends* to promote a common case, exchange information, and exert pressure (Gullberg, 2008a, p. 2964). Although, business/industry interest groups also lobbied their *foes* on single policy decisions as part of their long-term strategy. Regarding general lobbying, interest groups aim to influence not only single policy decisions but also the policymakers' position on the policy field and future policy decisions (Gullberg, 2008a, pp. 2964-2965). It was found that interest groups representing the environmental movement and the business/industry lobbied both their *friends* and *foes* (Gullberg, 2008a, p. 2965). The findings related to lobbying

single policy decisions are considered the most relevant for this thesis, as it investigates the lobbying of the revision of the EU ETS, which is a single policy decision. Further, from these findings, it can be assumed that both CAN Europe and FuelsEurope will lobby their *friends* and that FuelsEurope will, in addition, lobby their *foes* when it comes to the revision of the EU ETS.

The concepts of *friends* and *foes* could be added to the lobbying targets, as these concepts help better understand whom interest groups target when lobbying in terms of target types. Taking this further, previous literature has considered the EP a friend of diffuse interests and the European Commission a friend of *specific* interests based on their characteristics and the needs of these two EU institutions (Greenwood, 2017, p. 41). Additionally, when further linking the concepts of *diffuse* and *specific* interests with the European Commission and the EP as targets, one can assume that the EP is a *friend* to CAN Europe and that the European Commission is a *friend* to FuelsEurope.

Based on the above-presented concepts identifying lobbying strategies, tactics, channels, targets, and target types, I formed a conceptual framework connecting all of these concepts together. This was done as, to my knowledge, there was no framework made including all these concepts, which I find relevant to use to investigate and better understand the lobbying of interest groups such as CAN Europe and FuelsEurope. This framework, including all these concepts, will arguably help identify more broadly how and whom CAN Europe and FuelsEurope lobbied during the EU ETS revision. Through this framework, I aim, in part, to contribute to further research on interest groups’ lobbying behaviour.

Table 1: Conceptual Framework

Strategies →	Channels →	Tactics →	Targets →	Target types
Inside lobbying (direct contact)	The Brussels channel The national channel (Both channels apply to both inside and outside lobbying)	Formal or informal contact with EU officials (i.e. stakeholders’ meetings, phone calls, emails, letters, consultations, expert groups, etc.) Lobbying alone In homogeneous coalition In heterogeneous coalition Via other interest groups Via EU member states	The European Commission The European Parliament The Council of the European Union (The targets can be applied to both inside and outside lobbying)	Friends Foes (The target types can be applied to all targets mentioned)
Outside lobbying (indirect contact)		<u>Information politics</u> (i.e. public campaigns, public events, using the media, op-ed articles, etc.) <u>Protest politics</u> (i.e. demonstrations, protests, letter-writing and signature campaigns, etc.) Lobbying alone In homogeneous coalition In heterogeneous coalition Via other interest groups Via EU member states		

Source: Author’s own compilation based on concepts used in Beyers (2004); Chalmers (2013); De Bruycker and Beyers (2019); Greenwood (2017); Gullberg (2008a); Miard (2013); Thomas (2021)

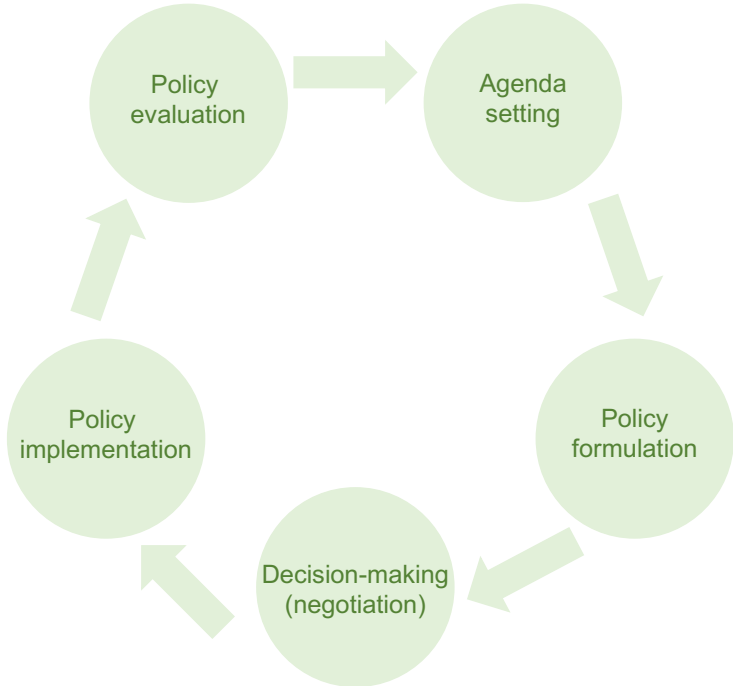
3.3 The Stages of the EU Policy Cycle

To answer the second research question asked, investigating if, to some extent, the lobbying strategies and tactics have successfully enabled interest groups (i.e. CAN Europe and FuelsEurope) to wield influence on the revised EU ETS for phase IV. This thesis aims to limit the focus on the formulation and negotiation stage of the policy cycle, consequently presenting the stages of the policy cycle within policy analysis as part of the methodology. The formulation stage is arguably considered a key stage as it involves the formulation process of the European Commission for the drafting of the initial proposal, in which the European Commission interacts with interest groups to acquire issue-specific and technical information (Greenwood, 2017; Versluis et al., 2011d). Previous literature has also emphasised the advantage of lobbying during the formulation stage compared to other stages to wield the most influence on the policy outcome (Rietig, 2016; Vítčá, 2008). Further, the negotiation stage is also considered a key stage, as it involves the negotiation of the two decision-making institutions, The EP and the Council, to reach a final policy agreement (Greenwood, 2017; Versluis et al., 2011b). Interest groups are also here involved in the negotiations among the EU institutions and other actors (Versluis et al., 2011b, p. 154).

Policies can seem almost impossible to study and analyse given all the aspects, actors, interests, information and data involved in the policy process (Versluis et al., 2011c, p. 18). One method to do policy analysis in order to deal with this complexity is to separate the policy-making process into different stages or steps and to focus on one or more of these stages. This method conceives policy as following its own life cycle with a beginning, middle and possibly end. However, it is important to recognise that policymaking in itself is not a linear process (Versluis et al., 2011c, p. 19). Most policies emerge over time, which is referred to as policy *emergence*, with the policy occurring as an output being the result of various inputs such as political pressure (lobbying included), the mobilisation of different stakeholders (actors with vested interests, financial resources, information and knowledge, and time. Time is a key element, as it is only time that allows the policy to emerge and develop truly.

Versluis et al. (2011a) divide the policy cycle into five stages; (1) the *agenda setting*, (2) *policy formulation*, (3) *decision-making (negotiation)*, (4) *policy implementation*, and (5) *policy evaluation* (Versluis et al., 2011c, p. 20). This policy cycle is further visualised in Figure 1 below. There might be certain stages where some actors are more involved than others, but there are few who limit themselves to a single stage, as most actors would want to influence and follow up throughout the whole policy cycle. This thesis chose to focus on the policy formulation and negotiation stages of the policy cycle. Policy formulation is referred to as “*when, in order to address the issue, a course of action is drawn up*”, and the negotiation stage is referred to as “*when the course of action is approved by actors able to decide*” (Versluis et al., 2011c, p. 20). The policy formulation stage is where decisions are *pre-made* before reaching the negotiation and agreement stages (Versluis et al., 2011d, p. 133). Policy formulation comes after the issue at hand has made it to the EU’s agenda as the policy must be formulated to take on form and content, which further develops into a legislative draft text in which decision-makers negotiate and decide upon (i.e. the negotiation stage).

Figure 1: The Policy Cycle Stages



Source: (Versluis et al., 2011c, p. 20)

There is no clear distinction between the policy cycle stages, which makes it difficult to pinpoint the line between each of the stages (Versluis et al., 2011d, p. 133). However, to simplify the distinction between these two stages, this thesis attempts to limit the formulation stage from the first consultation on the EU ETS post-2020, which was initiated on the 8th of May 2014, to when the European Commission put forwards their proposal to be further negotiated by the EP and the Council on the 16th of July 2015 (Procedure 2015/0148/COD). Additionally, this thesis limits the negotiation stage from the 16th of July 2015, when the European Commission put forwards its proposal, until the 14th of March 2018, when the EP and the Council co-signed the agreement of the revised EU ETS for phase IV. These timeframes for the two stages are only set to make it easier to analyse the lobbying activity of CAN Europe and FuelsEurope. These suggested timeframes for the two stages are not necessarily correct as one cannot truly pinpoint when a stage starts or ends, but they are set to make it easier to distinguish between the two stages in the analysis of this thesis.

During the policy formulation stage, officials working for national and EU institutions are served information by interest groups representing industry, NGOs, academia or civil society, and technical experts (Versluis et al., 2011d, p. 134). Due to its role as a legislative initiator of most policy issues, the European Commission is considered the central EU institution at focus during the policy formulation stage. The combination of the European Commission’s limited size and staff and most of the EU policies being fairly technical makes the European Commission unable to singlehandedly draft proposals. The European Commission, therefore, welcomes valued information from different actors, stakeholders, experts, and interest groups when shaping the policy draft proposal. In addition, their policy networking during the formulation stage contributes to securing policy support and reducing opposition during the negotiation stage. Several actors

attempt to influence the shape and content of the legislative text through lobbying efforts, negotiations and by proposing alternatives to the texts presented by the European Commission (Versluis et al., 2011d, p. 133). Considering this, one can assume that the main target during the policy formulation stage is the European Commission.

When analysing the negotiation stage, the focus is mainly on how different actors influenced new EU policies and laws and whether the process of the agreement was easy or difficult, slow or fast, harmonious or burdened with conflict (Versluis et al., 2011b, p. 154). This policy stage involves the negotiation between several players, such as officials from the main EU institutions, ministers and civil servers representing government levels, representatives of the EU member states, interest groups and public affairs consultants. These actors are involved in the preparatory venues, such as working groups, expert committees and ambassadorial meetings, and are often the same as those involved in the agenda-setting and formulation stages (Versluis et al., 2011b, p. 155). During the negotiation stage, the EP and the Council are perceived as the two central EU institutions in focus due to their roles as the two legislative bodies participating in the joint co-decision of the OLP. The OLP entails two readings between the EP and the Council, although most policies are agreed upon during the first reading, which was the case for the revision of the EU ETS phase IV (Versluis et al., 2011b, p. 165). Considering this, one can assume the EP and the Council are the main targets during the negotiation stage.

4 Methodology

This chapter aims to explain the methodology used by this thesis to answer the two research questions presented. The first research question asks *What lobbying strategies and tactics have CAN Europe and FuelsEurope used when lobbying towards the revised EU ETS Directive 2018?* And the second research examines *to what extent have these lobbying strategies and tactics been successful and enabled the two interest groups to wield influence on the formulation and decision-making(/negotiation) stage of the legislative process?* A qualitative comparative case study analysis will be used to answer these questions. Further, document analysis will be used to collect data for further analysis. In addition, to answer the second research question, a set of factors measuring success will be presented inspired by previous literature and the conceptual framework presented in Chapter 3 (see Table 1, p. 19). EU policy analysis, focusing on the following policy cycle stages, formulation, and negotiation, will be used to limit the scope of this study. Lastly, the limitations of my thesis will be presented.

A qualitative research method can be characterised by focusing on understanding rather than explaining, closer relations with the informants, and using texts as data rather than numbers (Tjora, 2018, p. 24). The comparative method is often associated with the qualitative method (Hague et al., 2016, p. 92). A qualitative comparative method is often used when investigating a limited number of cases to understand an occurrence within its natural setting and holistically, focusing on behaviour, context, values and opinions (Hague et al., 2016, p. 95). The case study is a popular method used in social sciences which enables the researcher to focus and study a single case or multiple cases (i.e. organisation, interest group, individual, etc.) (Burnham et al., 2008, p. 63). Selecting one or more cases is also a standard method within qualitative research to limit the scope of the study, as it naturally defines who and what is included or excluded in the study (Tjora, 2018, p. 41). A case study further allows the researcher to use all kinds of qualitative or quantitative methods to collect data. Additionally, a qualitative comparative case study is an in-depth investigation of a limited number of cases and a comparison of these cases within their natural scenery (Hague et al., 2016, p. 93).

Within comparative methods, there are two main methods to compare cases: the most similar system design (MSSD) and the most dissimilar system design (MDSD) (Møller, 2015, p. 101). MSSD is relevant when comparing cases which are similar to each other but are expected to differ in the dependent variable, while MDSD is relevant when comparing cases which are mainly dissimilar to each other but are expected to equalise in the dependent variable (Møller, 2015, p. 102). Since it is challenging to expect CAN Europe and FuelsEurope to have lobbied towards the EU ETS revision differently or similarly, I will make a simple comparison of these two cases.

4.1 Data Collection and Analysis

This thesis uses document analysis as a method to collect qualitative data for the study investigating the lobbying of CAN Europe and FuelsEurope. Document analysis is one of the main methods used to collect qualitative data (Tjora, 2018, p. 182). This method of

collecting data is considered unobtrusive, as the data collection does not involve researched participants. The data collected mainly consists of documents produced for purposes other than research, such as EU official documents, responses from CAN Europe and FuelsEurope to stakeholder consultations organised by the European Commission, published documents from CAN Europe and FuelsEurope, and news articles. Document analysis is often used as a complementary method to collect data in addition to interview and observation methods (Tjora, 2018, p. 183). Document analysis as a method to collect data is often used complementarily with the methods of interviews and observations (Tjora, 2018, p. 183). While documents give a good overview of time and place-specific information about a situation or a process, they cover only some of the truth. Therefore, it is often helpful to attain complementary data from interviews or observation to reach more insight into what actually happened other than what is shown through publicly available documents (Moses & Knutsen, 2019, p. 130). Consequently, as I was not able to conduct the semi-structured interviews as planned, this thesis will conduct a pure document analysis, which means that it will be used as the primary method to collect data in my thesis (Tjora, 2018, p. 183). The sub-chapter below will further elaborate on the method of semi-structured interviews and how I proceeded in my attempt to conduct them.

Further, the documents collected are both *case-specific* and *general* (Tjora, 2018, p. 183). The case-specific documents are data collected to gain information about the lobbying of the interest groups CAN Europe and FuelsEurope, and consist of documents such as position papers, annual reports, and websites containing relevant information about the lobbying strategies and tactics used by the two interest groups. The general documents are data collected from policy documents, legal documents, news sites, research articles, books, and other websites. Most of the documents collected are related to the process of the EU ETS revision for phase IV and the two interest groups investigated. The case-specific and general documents collected are relevant as they reveal examples of lobbying strategies and tactics that CAN Europe and FuelsEurope used during the EU ETS revision. The documents collected are limited to the timeframe of this study, 2014-2018, which is set based on when the first consultation on the EU ETS revision was held in May 2014 until when the EP and the Council signed the final agreement in March 2018. The document analysis will draw upon the theoretical framework presented in Chapter 3 to help understand how CAN Europe and FuelsEurope lobbied the EU ETS revision and to investigate further the extent of success the used strategies and tactics in enabling the interest groups to wield influence during the formulation and negotiation stage of the policy cycle. However, the document analysis will be limited as the findings on the lobbying strategies and tactics used by CAN Europe and FuelsEurope are based on publicly available documents and will not be able to uncover lobbying strategies and tactics used "behind the scenes".

There are some things to consider when using document analysis to collect data. First, it is important to recognise that the world includes social facts, meaning that what we study is neither singular nor independent of the researcher themselves (Moses & Knutsen, 2019, p. 10). For instance, in the case of this thesis, I might understand and interpret the findings differently than others. When investigating the lobbying of CAN Europe and FuelsEurope, I will use the documents found to understand better and identify the lobbying strategies, tactics, and targets they use. Since the documents used cannot uncover the whole *truth* of how these two interest groups lobbied, the findings can only partly contribute to increasing the knowledge of how they lobbied.

4.2 Semi-Structured Interviews

Conducting interviews is one of the most common methods to collect qualitative data, in which semi-structured interviews are a popular type of interviews (Tjora, 2018, p. 113). This method has also proved to be a popular method to collect data in previous literature investigating the lobbying of interest groups (Eikeland & Skjærseth, 2019; Gullberg, 2008a, 2008b; Miard, 2013; Rietig, 2016; Skjærseth & Wettestad, 2010; Thomas, 2021; Wettestad, 2009), and the success of lobbying strategies and tactics to wield influence (De Bruycker & Beyers, 2019). Therefore, to answer the research questions set out in this thesis, semi-structured interviews were considered a valuable supplement of data to gain more insight into how and whom CAN Europe and FuelsEurope lobbied during the EU ETS revision (i.e. their use of lobbying strategies, tactics and targets), and their perceptions of the extent of success of the lobbying strategies and tactics used for them to wield influence on the EU ETS.

Semi-structured interviews are useful when investigating attitudes, opinions, and experiences (Tjora, 2018, p. 114). In other words, when investigating the *real world* from the perspective of the interviewee. Further, semi-structured interviews can be placed in between the two ideal-typical interview forms, which are carefully structured on the one hand, and unformal and free-flowing on the other hand (Moses & Knutsen, 2019, p. 130). Consequently, semi-structured interviews aim to create room for a relatively free conversation which circuits specific topics which are both relevant to the study and decided upon beforehand (Tjora, 2018, p. 113). In this way, the interviewee would be given room for reflection, and the interviewer would be given space to steer the conversation in a direction most suited to the research topic based on the interviewee's answers. This type of interview also allows the interviewee to touch upon topics and matters related to the research topic that the interviewer did not anticipate (Tjora, 2018, p. 30).

An interview guide containing my questions and interview discussion points was created (Appendix 1). The questions are not meant to be strictly followed in one or another order but rather function as a guide for me as an interviewer during the interview. In this way, I am less at risk of being carried away or forgetting to ask questions about certain topics during the interview. The topic for the interview is "*The lobbying strategies and tactics the organisation used vis-à-vis the EU ETS and the success of the lobbying strategies and tactics used in wielding influence*". It is divided into three sections with open questions, the first section consists of a few warm-up questions to start the interview naturally and to make the interviewee comfortable. The second section consists of part one of the interview topic, with open questions/discussion points aiming to identify the lobbying strategies and tactics used vis-à-vis the EU ETS revision for phase IV. The third and last section consists of part two of the interview topic, with open questions/discussion points aiming to get an insight into their perceptions of the success of lobbying strategies and tactics to wield influence.

Before using the interviews as a supplementary method for collecting data, I sent the interview guide for approval to the Norwegian Centre for research data (Sikt). The interview guide was further approved by Sikt and can be found in Appendix 1. Before conducting interviews, the interviewees had to be informed and consent to it (NESH 1999, in Tjora, 2018, p. 47). Therefore, when contacting the interviewees to enquire about an interview, I attached a consent form (Appendix 2) which described the research

topic of my thesis, the types of questions to expect and their rights as interviewees during and after the writing process of the thesis. I planned to conduct two semi-structured interviews to supplement the data collected from the document analysis. These semi-structured interviews were to be organised with one representative from each of the two interest groups chosen in my thesis, CAN Europe and FuelsEurope. Interviewees were chosen based on their organisational affiliation with CAN Europe or FuelsEurope and their work towards the EU ETS. The interviews were to happen online through Zoom and one-on-one and last thirty to sixty minutes, depending on their availability.

Both CAN Europe and FuelsEurope were contacted by email. FuelsEurope declined to participate in the interview, which was a bit disappointing given that they had participated in past projects (Eikeland & Skjærseth, 2019; Gullberg, 2008a, 2008b). CAN Europe responded positively but had to decline to participate as they did not have time for an interview before the deadline of my thesis. Not being able to conduct any of the planned interviews is considered a limitation of my thesis. The interviews were to serve as a supplement to the data collected through the document analysis, which provides the core data for this thesis. As the interviews were supposed to bring more insight into aspects that the document analysis cannot cover, my thesis will be limited to the investigation of CAN Europe's and FuelsEurope's lobbying towards the EU ETS revision based on publicly made documents.

Further, the measurement of the success of the used lobbying strategies and tactics in enabling CAN Europe and FuelsEurope to wield influence on the EU ETS revision will be limited. The interviews were supposed to bring more insight into the interest groups' own perception of the success of the lobbying strategies and tactics they used in enabling them to wield influence. This would be a valuable addition when measuring the success of the lobbying strategies and tactics used. However, the findings through document analysis can still be considered and used in future research investigating the same topics.

4.3 Measuring Success

Before presenting how I aim to measure the success of the strategies and tactics used to enable the interest groups (i.e. CAN Europe and FuelsEurope) to wield influence, I will define what I mean by success. Inspired by De Bruycker and Beyers (2019), who investigates the extent of success of lobbying strategies and tactics, focusing on inside and outside strategies. I use their definition of success as "*the extent to which the policy objectives of an interest organization are realized*" (De Bruycker & Beyers, 2019, p. 58). Further, when measuring the extent of success of the strategies and tactics used to enable the interest groups to wield influence. I will refer to success as the extent of lobbying strategies and tactics to enable interest groups to gain influence over the EU policy process. Success differentiates from the term influence as success can be acquired through both endogenous (e.g. advocacy, political resources or coordinated action) and exogenous (e.g. economic changes, support from policymakers, technological progressions) factors together or separately (De Bruycker & Beyers, 2019, p. 59). In contrast, influence requires endogenous factors to be achieved. Investigating the success of lobbying strategies and tactics is arguably important to get more insight into the influence of an interest group, as their influence lies in between their use of lobbying strategies and tactics and achieving their preferred policy outcomes. To further measure the extent of success of the strategies and tactics used to enable the interest groups to

wield influence on the EU ETS revision, I will draw on previous literature and the conceptual framework presented in Chapter 3 (see Table 1, p. 19).

Inside lobbying implies granting access to influence EU officials through formal and informal meetings for interest groups to exchange information. This further is considered, by former literature, an advantage to influence the EU policy (Beyers, 2004; Chalmers, 2013; De Bruycker & Beyers, 2019; Rietig, 2016; Wettestad, 2009). Considering this, it is logical to assume that the more formal and informal meetings an interest group has with EU officials, the more they grant access and further success in wielding influence on the EU ETS. This is also what previous literature assumes (Beyers, 2004; Chalmers, 2013; De Bruycker & Beyers, 2019; Rietig, 2016; Wettestad, 2009). Therefore, *Formal and informal meetings with EU officials* are added as a determinant for measuring the success of the inside strategy, whereas the higher the number of such meetings, the more success it brings for interest groups to wield influence on the EU ETS.

Outside lobbying implies influencing EU officials indirectly through public strategies such as public campaigns and events, demonstrations, and protests (Beyers, 2004). Previous literature suggests that outside strategies also grant interest groups influence on the EU policy process and that this influence increases the higher the public pressure they manage to reach (Chalmers, 2013; De Bruycker & Beyers, 2019; Rietig, 2016). Bearing this in mind, it is logical to assume that the more public pressure attained through outside strategies and tactics, the more success will be reached in wielding influence on the policy process. While public pressure is challenging to measure, I chose to add *outside strategies and tactics* as determinants, where the amount of outside strategies and tactics used by interest groups determine their success in wielding influence. The more outside strategies and tactics used, the more success is achieved in wielding influence on the EU ETS.

Studies done by Rietig (2016) and Vîtcă (2008) found that lobbying during the formulation stage leads to more success than lobbying after the initial proposal is formulated, as the chances to succeed after the formulation stage are considered reduced. Based on these findings, I find it reasonable to assume that using inside and outside tactics during the formulation stage has more value than during the negotiation stage. This will further be measured through the determinants of *lobbying during the formulation stage* and *lobbying during the negotiation stage*. If interest groups lobby more during the formulation stage than during the negotiation stage, they gain more success in wielding influence, whereas if they lobby more during the negotiation stage than the formulation stage, they gain less success in wielding influence on the EU ETS.

Outside and inside strategies are considered costly in the means of resources (i.e. personnel and financial resources), although outside strategies are considered more costly than inside strategies (Beyers, 2004; De Bruycker & Beyers, 2019; Gullberg, 2008a, 2008b). I, therefore, find it reasonable to add the number of resources as a determinant for success in wielding influence, as the more resources interest groups have, the more lobbying activities they can execute. Consequently, the more personnel and financial resources an interest group has, the more success the interest group will have in wielding influence on the EU ETS, and the opposite.

Former literature has demonstrated that several interest groups rely on both inside and outside strategies and that both strategies are deemed successful in gaining access and attaining influence (Beyers, 2004; Chalmers, 2013; De Bruycker & Beyers, 2019). Based on this, I find it reasonable to add *only using outside or inside strategies* and *using both*

inside and outside strategies as determinants for measuring success. Additionally, De Bruycker and Beyers (2019, p. 58) argue that the success of inside strategies implies an apolitical and technocratic EU policymaking nature, while the success of outside strategies implies EU policymaking being receptive to public pressure. The policymaking during the EU ETS revision arguably fits both of these implications as it is an economic instrument affecting the industry with an aim to decrease GHG emissions and fight climate change, making its nature both technocratic and receptive to public pressure. I, therefore, find it logical to assume that using *both inside and outside strategies* will lead to more success while *only using outside or inside strategies* will lead to less success.

As mentioned in the above Chapter, the Brussels channel implies lobbying the EU institutions directly, while the national channel means lobbying the EU institutions indirectly through national institutions or organisations (Greenwood, 2017). Bearing this in mind, I find it reasonable to assume that lobbying directly through the Brussels channel leads to more success in wielding influence than lobbying indirectly through the national channel. Therefore, adding *lobbying through the Brussels channel* and *lobbying through the national channel* as determinants, I assume that the Brussels channel leads to more success, and the national channel leads to less success.

Further, when investigating the lobbying tactics, previous literature has found that lobbying European institutions through coalitions has strengthened the position of interest groups and further enabled them to wield influence on the EU policy (De Bruycker & Beyers, 2019) and on the EU ETS (Thomas, 2021) compared to when lobbying alone. On this basis, it is logical to identify *lobbying alone* and *lobbying in a coalition* as two determinants for measuring the extent of success of lobbying strategies and tactics in wielding influence. It is further found that lobbying through heterogeneous coalitions brought more success than lobbying through homogeneous coalitions (De Bruycker & Beyers, 2019; Thomas, 2021). I, therefore, find it valid to separate the determinant of *lobbying in a coalition* into two distinct determinants *lobbying in a heterogeneous coalition* and *lobbying in a homogeneous coalition*. Further, De Bruycker and Beyers (2019) found that lobbying through coalitions contributed to wielding influence when using outside tactics only or in addition to inside tactics. While if an interest group solely relied on inside strategy and tactics, it was better to lobby alone rather than in a coalition (De Bruycker & Beyers, 2019, p. 69). Based on these findings and determinants, I find it sensible to measure the use of outside strategies, both solely or in addition to inside strategy, as (1) less successful when lobbying alone, (2) partly successful when lobbying in homogeneous coalitions, and (3) most successful when lobbying in heterogeneous coalitions. With the sole use of inside strategy, I will measure an interest group as more successful when lobbying alone.

Lastly, past studies have found that interest groups lobby friends rather than foes Field when it comes to single policy decisions within EU climate policy, such as the EU ETS revision (Gullberg, 2008a). This indicates that interest groups gain more success in wielding influence when lobbying friends rather than foes, which corresponds with the findings of a study done by Rietig (2016). Consequently, I consider *lobbying friends* and *lobbying foes* as determinants for assessing the success of lobbying strategies and tactics to wield influence. I will further measure *lobbying friends* as leading to more success and *lobbying foes* as leading to less success.

4.4 Limitations to the Study

My thesis includes several limitations. The most apparent limitation of my study is that it solely relies on the data collected through document analysis, as I could not conduct the semi-structured interviews as initially planned. Consequently, I can claim less insight into how and whom CAN Europe and FuelsEurope lobbied during the EU ETS revision and how successful their lobbying strategies and tactics were. Further, my study focuses only on the EU ETS revision for phase IV (2021-2030), which indicates that the findings in my thesis cannot be translated to how CAN Europe or FuelsEurope lobbied the previous or the later revisions of the EU ETS. Further, my thesis limits its timeframe from 2014 to 2018 and focuses only on the formulation and negotiation stages of the EU ETS revision. This means that future research might acquire other findings than those of my thesis when investigating the lobbying of CAN Europe and FuelsEurope during the EU ETS revision.

5 CAN Europe lobbying during the EU ETS revision (2014-2018)

This chapter sets out to analyse how and whom CAN Europe lobbied for the revised EU ETS for phase IV during the period 2014-2018 with a focus on the formulation and the negotiation stage of the policy process. This is done by drawing from the conceptual framework presented in Chapter 3. The data collected for this analysis are done through the method of document analysis as specified in Chapter 4. The study's timeframe is limited to the period 8th of May 2014 till the 14th of March 2018, which is set based on the EU policy cycle analysis presented in Chapter 4. The first sub-chapter will identify CAN Europe as a *diffuse* interest and present how this is assumed to affect their lobbying behaviour. In the second sub-chapter, this analysis will investigate CAN Europe's use of inside and outside strategies and tactics during the EU ETS revision. In the third sub-chapter, this analysis will investigate the lobbying channels and targets that CAN Europe used during the EU ETS revision. Lastly, in the fourth sub-chapter, this analysis will explore whether CAN Europe lobbied their friends or foes during the EU ETS revision.

5.1 Diffuse vs. Specific

CAN Europe, as an ENGO, can be considered an interest group defending *diffuse* interests, as they defend interests such as climate change, the environment, and sustainable development, which are issues that are of concern within general parts of society (Beyers, 2004, p. 216; Climate Action Network Europe, 2023b). Further issues of concern for CAN Europe are climate action, agriculture and rural development, energy, and humanitarian aid and civil protection, to mention a few (Transparency Register, 2023a). The diffuseness of their interests is also illustrated through their vision "*to protect the atmosphere while allowing for sustainable and equitable development worldwide*", which can be understood as both a diffuse and broad vision (Climate Action Network Europe, 2023b).

Drawing from the conceptual literature, some assumptions can be made by categorising CAN Europe as a *diffuse* interest, drawing from the conceptual framework presented in Chapter 3. Firstly, it can be assumed that CAN Europe was at a disadvantage (less successful) in its efforts to influence the EU ETS revision due to the diffuseness of their interests and weak structure. Secondly, it can be assumed that CAN Europe used outside strategies and tactics more than inside strategies and tactics when lobbying towards the EU ETS revision. Thirdly, another assumption is that CAN Europe will find it easier to target the EP than the European Commission and the Council. Finally, it can be expected that the EP and the Council can be considered a *friend* of CAN Europe since the EP has historically supported *diffuse* interests (Greenwood, 2017, p. 41), and *diffuse* interests are considered given the most access to the Council (Greenwood, 2017, pp. 28-29).

5.2 Inside and Outside Lobbying

CAN Europe has proven to have been considerably active during the formulation and negotiation stages of the EU ETS revision, using both inside and outside strategies and tactics extensively. Although we might associate CAN Europe the most with their public activities and campaigns as these are the most evident lobbying strategies and tactics for the public. This analysis finds examples of CAN Europe using both inside and outside strategies and tactics. Further, within outside strategies, we find examples of CAN Europe using both information politics and protest politics tactics within the outside strategy. During the formulation stage, CAN Europe published one position paper addressing what they think are needed revisions of the EU ETS to ensure it brings a fair contribution to fight climate change (Climate Action Network Europe, 2014b). Further, CAN Europe published several position papers during the negotiation stage of the EU ETS revision presenting the position of CAN Europe advocating for a more stringent and ambitious revision of the EU ETS (Climate Action Network Europe, 2016b, 2016c, 2016d). These publicly presented position papers aim to reach EU officials working on the EU ETS revision and can therefore be considered as information politics tactics.

CAN Europe published two reports during the formulation stage of the EU ETS, containing specific and technical information and research relevant to the EU ETS revision and general EU climate and energy policy (Gutmann et al., 2014; Michalak et al., 2014). These reports are named "Europe's Dirty 30" and "Stronger Together" and include recommendations and opinions on the EU ETS revision and EU climate and energy policy in general. These recommendations were directed at the European decision-makers within the EU and its 28 Member States. During the negotiation stage, CAN Europe published a report named "Gigatonne gap in the EU pledge for Paris Climate Summit" (Climate Action Network Europe, 2015g). This report includes technical and specific information about the impact of the policy choices of the EU, including the EU ETS revision choices, and provides recommendations for future actions that the EU should take to ensure an effective climate policy. In addition to reports, CAN Europe published several briefings about the EU ETS revision during the negotiation stage of the EU ETS revision (Climate Action Network Europe, 2016k, 2016l, 2016v, 2017i; Morris & Luta, 2016). These briefings contain specific information and research related to the EU ETS and the recommendations and opinions of CAN Europe and are meant to be directed at EU officials from the European Commission, the EP, and the Council. Additionally, CAN Europe arranged a public online press briefing about the state of play of the EU ETS negotiations in advance of the meeting of the Environmental Council on the EU ETS revision (Climate Action Network Europe, 2017v). During this press briefing, representatives from CAN Europe, Carbon Market Watch and WWF Germany also spoke of what actions would be needed to amend the EU ETS revision in line with the Paris Agreement. Further, CAN Europe published several factsheets during the negotiation stage containing shortly formulated information about the EU ETS and CAN Europe's priorities for the revision (Climate Action Network Europe, 2016h, 2016m, 2017j).

During the formulation stage, CAN Europe published op-ed pieces concerning the EU ETS revision for phase IV on the news website EURACTIVE (Nilles et al., 2015; Trio, 2015). In these op-ed pieces, CAN Europe asks Members of the European Parliament (MEPs) to vote for a more robust Market Stability Reserve in the EU ETS and ask the European Commission to propose an ambitious and more stringent EU ETS. CAN Europe also published several op-ed pieces during the negotiation stage concerning the EU ETS revision on the news websites EURACTIVE and Climate Home News, and on The

Parliament Magazine (Kollmuss, 2015; Trio, 2016a, 2016b, 2016c, 2017a, 2017b, 2017c). These op-ed pieces address the need for a more ambitious EU ETS revision so that it is coherent with the Paris Agreement and so that the EU can play a leadership role in international climate negotiations. These op-ed pieces are meant to target EU officials from the European Commission, the EP, and the Council and inform them about the EU ETS revision process and CAN Europe's position and priorities concerning the EU ETS revision. Therefore, these reports, briefings, and op-eds serve as examples of CAN Europe's use of information politics to lobby towards the EU ETS revision as they aim to bring information to EU officials. The op-eds can further be considered media campaigns directed at EU decision-makers to draw attention to the opinions and recommendations of CAN Europe concerning the EU ETS revision.

CAN Europe has also published press releases reporting on updates with the EU ETS revision process and expressing their opinion on the occurrences during the formulation and negotiation stages. During the formulation stage, CAN Europe published several press releases addressing the need for limiting the number of pollution allowances and setting an ambitious emission reduction target of 55% to make the EU ETS post-2020 an effective climate policy (Climate Action Network Europe, 2015c, 2015d, 2015e, 2015k). During the negotiation stage, CAN Europe published blog posts and press releases commenting on the EU ETS revision. The press releases published informed about the negotiation progress of the EP and the Council on the EU ETS revision and CAN Europe's opinions during the process (Climate Action Network Europe, 2015f, 2016g, 2016j, 2016q, 2016u, 2017b, 2017c, 2017g, 2017i, 2017k). It comes through that even though the EP and the Council are able to increase the climate ambitions of the EU ETS revision in relation to the proposal of the European Commission, their further proposals on the EU ETS revision were still not in line with the ambitions of the Paris Agreement. The same is expressed through the blog posts that CAN Europe published on the EU ETS revision during the negotiation stage (Climate Action Network Europe, 2015a, 2016e, 2017d, 2017e, 2017f, 2017u, 2017x). These blog posts are published on CAN Europe's website as part of their news and publications (Climate Action Network Europe, n.d.-c). The press releases and blog posts can be considered as both information politics and protest politics because they both increase attention and salience and present information meant for decision-makers working on the EU ETS revision.

The EP held its elections in 2014 during the formulation stage of the EU ETS revision, in this respect, CAN Europe organised a signature campaign for MEPs to sign a climate pledge committing to tackle climate change during their office term (Climate Action Network Europe, 2014a). Over 450 MEPs signed this pledge, and over 70 of these MEPs were re-elected for a new term in the EP. This signature campaign aimed to inform EU citizens about whom to vote for in the EP elections to ensure a more "climate-friendly" EP and can be considered as part of CAN Europe's protest politics tactics as the campaign aims to attract attention and salience. The campaign could further be followed through the hashtag #ClimatePledge and @CANEurope (Climate Action Network Europe, 2014f). During the negotiation stage, CAN Europe organised several petition campaigns collecting signatures from EU citizens urging the EP to vote for a more climate-ambitious EU ETS revision (Climate Action Network Europe, 2016r, 2017w, n.d.-a, n.d.-b). These petitions aimed to raise attention and salience about the EU ETS revision among EU citizens and create awareness of CAN Europe's mobilised position on the EU ETS revision, which can therefore be considered as protest politics tactics. In addition to these petitions, CAN Europe organised a media stunt during the negotiations of the EU ETS revision, advocating for an ETS that would "work for the climate" and not provide the polluters

more presents (Climate Action Network Europe, 2017a, p. 5). These campaigns and media stunts can be considered protest politics tactics as they both increase attention and salience on the EU ETS revision among EU officials and the general public.

In addition to the outside strategies and tactics used, we find examples showing that CAN Europe also did a lot of inside lobbying during both the formulation and negotiation stages. During the formulation stage, the European Commission held two consultation rounds and three stakeholders' meetings on the EU ETS post-2020 carbon leakage provisions (Directorate-General for Climate Action, 2014; European Commission, 2014a, 2014c). CAN Europe was present at the first of the three stakeholders' meetings on the 13th of May and held a presentation about carbon leakage, competitiveness, and lessons learned so far (Climate Action Network Europe, 2014c). In addition, CAN Europe submitted a response for both consultation rounds held, the first one addressing the carbon leakage provisions in the EU ETS post-2020 and the second one addressing the EU ETS revision for phase IV (European Commission, 2014b, 2015).

Further, CAN Europe had several meetings with EU officials from the European Commission during the formulation and negotiation stages of the EU ETS. In 2015, CAN Europe was among the top ten most active interest groups in Brussels out of more than 8000 and among the top two NGOs with the most face-time with officials from the European Commission (Climate Action Network Europe, 2016a, p. 4). In addition, CAN Europe was the interest group that had the most meetings with the Commissioner for Climate Action and Energy, Miguel Arias Cañete, during the term 2014-2019 (Transparency International EU, n.d.). This suggests that CAN Europe were fairly networked with EU officials from the European Commission compared to other interest groups. CAN Europe had 20 meetings with officials from the European Commission during the formulation stage (Transparency Register, 2023b). Out of these meetings, seven were with the Commissioner for Climate Action and Energy, Miguel Arias Cañete, and one was with the First Vice-President of the European Commission, Frans Timmermans. Whereas most of these meetings were about EU climate and energy policy, two of them explicitly noted the EU ETS revision as a subject for the meeting. One can further assume that the EU ETS revision was discussed in more than two out of the 20 meetings as the EU ETS can be considered closely related to the subject of EU climate and energy policy. During the negotiation stage, CAN Europe had 41 meetings with officials from the European Commission (Transparency Register, 2023b). Eighteen of these meetings were with the Commissioner for Climate Action and Energy, Miguel Arias Cañete. Most of these meetings were about EU climate and energy policy, which arguably can be assumed to have discussed the EU ETS revision. Whereas two of the meetings had the EU ETS as a subject. Further, most of the meetings during both the formulation and negotiation stages were with high officials from the Directorate-General of Climate Action and Energy.

Additionally, CAN Europe contacted EU officials through letters during the formulation and negotiation stages. During the formulation stage, one letter was sent to the President of the European Commission, Jean-Claude Juncker, and the College of Commissioners addressing CAN Europe's main priorities regarding the EU ETS revision (Climate Action Network Europe, 2015i). Further, CAN Europe sent several letters during the negotiation stage. These letters were sent to EU and national officials from the EP, the Council, the EU Heads of State and Government, the European Commission, EP committees, and the EU ETS revision Rapporteurs (Climate Action Network Europe, 2015h, 2015j, 2016n, 2016o, 2016p, 2016s, 2016t, 2016w, 2017m, 2017n, 2017o,

2017p, 2017q, 2017r, 2017s, 2017t). All these letters addressed the need to alter the climate ambitions of the European Commission's draft proposal for the EU ETS revision and were strategically sent ahead of different events such as the Informal Energy Council and Conference of the Parties, as well as meetings within the EP and the Council discussing the EU ETS revision. These letters were mainly directed to the Industry, Research and Energy (ITRE), and the Environment, Public Health and Food Safety (ENVI) committees of the EP, and the Environmental Ministers of the Council.

During the formulation and negotiation stages, CAN Europe was also involved in several expert groups organised by the European Commission (Transparency Register, 2023a). Whereas the "High Level expert Group on energy-intensive industries" is arguably the most relevant one in relation to the EU ETS revision as the expert group serves to *"advise and assist the Commission in the preparation of policy initiatives relating to or affecting energy-intensive industries..."* in which the EU ETS does (European Commission, 2023d). Further, due to the adoption of the EU ETS revision for phase IV, the European Commission established two additional expert groups on climate change policy and innovation fund, in which CAN Europe is a member (European Commission, 2023a, 2023e). All these three expert groups are still active today.

5.3 Channels and Targets

CAN Europe has arguably been lobbying through both the national and the Brussels route during the EU ETS revision. They used the national route through their national offices placed in Denmark, Germany, Slovenia and Poland and through coordinated activities with their member NGOs active in 38 European countries (Climate Action Network Europe, 2023a, 2023c). The use of the national channel is also shown through the abovementioned examples, where CAN Europe sent letters to all EU heads of state and government (Climate Action Network Europe, 2016w, 2017q). One was sent from CAN Europe's head office, while the other was sent through CAN Europe's Coalition for Higher Ambition. However, it is evident that CAN Europe used the Brussels channel much more than the national one when lobbying during the EU ETS revision. CAN Europe engaged directly with the European Commission, the EP, and the Council through the use of both outside and inside strategies and tactics. This could be explained by the fact that the EU ETS is a policy which affects the interests of CAN Europe, further, CAN Europe is an interest group organised at the European level working on climate and energy policies in Europe (Climate Action Network Europe, 2023b). Further, the findings show that CAN Europe has had access to the European Commission, the EP, and the Council through inside tactics such as meetings, participation in consultations and expert groups, and through letters sent. This access also explains CAN Europe's use of the Brussels route.

Considering the targets, the findings presented in the sub-chapter above show that CAN Europe targeted the European Commission, the EP, and the Council during both the formulation and the negotiation stages. However, CAN Europe targeted the European Commission the most during the formulation stage, compared to the EP and the Council. This makes sense, given that the European Commission has the role of legislative initiator (Versluis et al., 2011d, p. 134). This also implies that CAN Europe has relatively good access to the European Commission. This goes contrary to the assumptions that diffuse interests find it challenging to gain access and engage in networking and that they tend to favour indirect over direct lobbying strategies and tactics (Beyers, 2004, p. 216). During the negotiation stage, CAN Europe more equally targets the European

Commission, the EP, and the Council, targeting the first mentioned EU institution more compared to the two latter. This can be explained by the role of the EP and the Council as the two legislative institutions (Greenwood, 2017, p. 41). This arguably implies that CAN Europe was, to some extent, able to get access to the EP, the Council, and the European Commission.

Further, CAN Europe targeted these EU institutions through lobbying alone, in homogeneous coalitions, and heterogeneous coalitions. First, CAN Europe in itself can be considered as a homogeneous coalition, which they also acknowledge by stating they are “*Europe’s leading NGO coalition fighting dangerous climate change*” (Climate Action Network Europe, 2023b). Considering this, one can arguably say that CAN Europe mostly lobbies in coalitions. There are examples of CAN Europe lobbying in coalitions and via other interest groups during both the formulation and the negotiation stages. CAN Europe is a member of an interest group named the Green10, which consists of the ten leading ENGOs active at the EU-level (Transparency Register, 2023a). Within this interest group, CAN Europe represented their voice on issues concerning energy and climate in meetings between the Green10 and leading officials from the European Commission, the EP, and the Council (Climate Action Network Europe, 2017a, p. 14). Examples of this are shown through the meetings CAN Europe has had with European Commission officials during the formulation and negotiation stages of the EU ETS revision (Transparency Register, 2023b).

Further, examples show that CAN Europe have lobbied both in homogeneous and heterogeneous coalitions. During the formulation stage, there were only found examples of lobbying in homogeneous coalitions by sending letters to EU officials, publishing briefings, reports, op-eds, and position papers (Climate Action Network Europe, 2014b, 2015i; Gutmann et al., 2014; Michalak et al., 2014; Nilles et al., 2015). During the negotiation stage, examples show that CAN Europe lobbied in both homogeneous and heterogeneous coalitions. CAN Europe lobbied in homogeneous coalitions by organising public press briefings, signature campaigns and sending letters to EU officials working on the EU ETS revision (Climate Action Network Europe, 2016r, 2016s, 2016t, 2017m, 2017p, 2017t, 2017v, 2017w, n.d.-a, n.d.-b). Further, in 2016, CAN Europe established a coalition named the Coalition for Higher Ambition which consisted of representatives from trade unions, businesses, NGOs and local authorities (Climate Action Network Europe, 2017a, p. 4). This coalition lobbied EU officials by sending letters urging the European Commission, the EP, and the Council to increase their climate ambitions by aligning EU climate and energy policy with the Paris Agreement objectives (Climate Action Network Europe, 2016w). The findings show that CAN Europe lobbied slightly more in coalitions during the negotiation stage than the formulation stage. This was mostly done through outside lobbying than inside lobbying tactics. Further, it is also found that CAN Europe mostly lobbied in homogeneous coalitions compared to heterogeneous coalitions.

5.4 Friends and Foes

In the case of the EU ETS revision, CAN Europe has arguably been lobbying both their *friends* and *foes*, that is, decision-makers with positions similar and positions opposed to their own (Gullberg, 2008a, pp. 2965-2966). The European Commission can be considered a foe on this issue for several reasons. Firstly, CAN Europe has expressed disappointment towards the European Commission led by President Jean-Claude Juncker and the Commissioner for Climate Action and Energy, Miguel Arias Cañete (Climate

Action Network Europe, 2014d, 2014e; Neslen, 2015). Concerns were expressed towards Cañete, during his hearing in the EP related to his appointment to the position of Commissioner for Climate Action and Energy, due to his shares in two oil companies (Neslen, 2014). Further, CAN Europe claimed the European Commission led by Juncker had been paralysing policy-making on environmental issues (Climate Action Network Europe, 2014d). Secondly, the European Commission's initial proposal for the EU ETS revision was claimed by CAN Europe to "care less about saving the climate than about protecting industry" (Climate Action Network Europe, 2015f). CAN Europe claimed that the proposal did not ensure that the EU meets its GHG emission goal of at least 40% by 2030 and that it allows too many free pollution permits to industry. This shows that, in the case of the EU ETS revision, the European Commission were less ambitious than CAN Europe hoped for and could therefore be considered a foe.

Compared to the European Commission, the EP and the Council could arguably be considered friends of CAN Europe in the case of the EU ETS revision. This is because although the EP and the Council did not revise the EU ETS to be as climate ambitious as CAN Europe wished for, they argued that the EU ETS revision still was not in line with the Paris Agreement, which made it an inefficient climate policy (Climate Action Network Europe, 2017h). Both the Council and the EP voiced their desire to strengthen the climate ambitions of the EU ETS revision compared to the one proposed by the European Commission, which was welcomed by CAN Europe (Climate Action Network Europe, 2016f, 2016i). In addition, the EP and the Council raised the climate ambitions of the EU ETS revision compared to European Commission's initial proposal (Climate Action Network Europe, 2017h). In this respect, it is found reasonable to consider the Council and the EP as friends of CAN Europe compared to the European Commission, although they did not entirely meet CAN Europe's demands for the EU ETS revision.

This analysis has explored more in detail how CAN Europe lobbied during both the formulation and negotiation stages of the EU ETS revision. The findings suggest that CAN Europe did not lobby entirely as expected, considering being a diffuse interest. The main findings show that CAN Europe used more inside than outside strategies and tactics during both the formulation and negotiation stages of the EU ETS revision, which is contrary to the expectations of diffuse interests to favour outside rather than inside strategies and tactics. Further, CAN Europe seems to have been more well-networked and have more access to the European Commission than initially assumed, as diffuse interests were expected to find it challenging to gain access and network within the EU institutions (Beyers, 2004, p. 216). Lastly, I find that CAN Europe has been able to mobilise for the issues they represent. This is shown through its extensive member base and the number of citizens and MEPs that signed CAN Europe's campaigns and petitions (Climate Action Network Europe, 2014a, 2016r). In the next Chapter, I will explore how FuelsEurope lobbied during the formulation and negotiation stages of the EU ETS.

6 FuelsEurope lobbying during the EU ETS revision (2014-2018)

This chapter sets out to analyse how FuelsEurope lobbied towards the EU ETS revision for phase IV during the period 2014-2018 with a focus on the formulation stage and the negotiation stage of the policy process. This analysis is based on the framework presented in Chapter 3 and aims to investigate how FuelsEurope lobbied during the EU ETS revision. This is done by first identifying FuelsEurope as a *specific* interest and presenting how this is assumed to affect their lobbying behaviour. Then in the second sub-chapter, this analysis will investigate FuelsEurope's use of inside and outside strategies and tactics during the EU ETS revision. The third sub-chapter will analyse FuelsEurope's use of lobbying channels and targets during the EU ETS revision. Lastly, I will investigate whether FuelsEurope lobbied their friends or foes during the EU ETS revision.

6.1 Diffuse vs. Specific

FuelsEurope can arguably be considered an interest group defending *specific* interests, as they defend well-defined interests closely related to their members: oil and gas companies operating in refining, production and exploration, and chemicals (Beyers, 2004, p. 216; FuelsEurope, n.d.). Further issues in which FuelsEurope takes interest in at the EU level are business and industry, competition, climate action, customs, and energy, to mention a few (Transparency Register, 2023c). FuelsEurope as a *specific* interest is further illustrated through their goal stating that they aim to represent their industry members within the EU policy debate by providing expert information and opinion on the process, production, use and distribution of their industry's products (Transparency Register, 2023c).

There are some assumptions that can be made with the categorisation of FuelsEurope as a *specific* interest, drawing from the conceptual framework presented in Chapter 3. Firstly, it can be assumed that FuelsEurope was an advantage (more successful) in its efforts to influence the EU ETS revision due to its well-defined socioeconomic interests, which are closely related to its member's economic and commercial interests. Secondly, it can be expected that FuelsEurope used inside strategies and tactics more than outside strategies and tactics during both the formulation and negotiation stages of the EU ETS revision. Thirdly, it can be assumed that FuelsEurope will find it easier to target the European Commission than the Council and the EP. Finally, it can be assumed that the European Commission can be considered a *friend* of FuelsEurope, given the ability of FuelsEurope as a *specific* interest in delivering technical and issue-specific information (Chalmers, 2013, p. 49)

6.2 Inside and Outside Lobbying

In the case of the EU ETS revision, examples show that FuelsEurope has used both inside and outside strategies and tactics during both the negotiation and formulation stages. During the formulation stage of the EU ETS revision, the European Commission held two consultation rounds and three stakeholders' meetings (Directorate-General for Climate Action, 2014; European Commission, 2014a, 2014c). FuelsEurope submitted a response for both consultation rounds on the EU ETS revision (European Commission, 2014b, 2015). Further, FuelsEurope also attended the second of the three stakeholders' meetings and where they held a presentation about carbon leakage and competitiveness, highlighting the need for sufficient carbon leakage allocation (FuelsEurope, 2014b).

Additionally, FuelsEurope had five meetings with EU officials from the European Commission during the formulation stage, in which two of them had the EU ETS revision as the subject of the meeting (Transparency Register, 2023d). One of the meetings was with the Commissioner for Climate Action and Energy, Miguel Arias Cañete. Further, two of these meetings were with the Director-General of Energy, Dominique Risor, and the Director-General of Internal Market, Industry, Entrepreneurship and SMEs, Daniel Calleja Crespo. During the negotiation stage of the EU ETS revision, FuelsEurope had 11 meetings with EU officials from the European Commission, where two of them had the EU ETS as a subject. Two of these meetings were with the Commissioner for Internal Market, Industry, Entrepreneurship and SMEs, Elżbieta Bieńkowska. Seven of them were with the Director-General for Energy, Dominique Ristori, the Director-General for Climate Action, Jos Delbeke, and the Director-General for Internal Market, Industry, Entrepreneurship and SMEs, Lowri Evans. Further, FuelsEurope attended the Informal Meeting of EU Energy Ministers in Bratislava on the 16th of July 2016, where they presented their views on the costs of EU refining and the EU ETS revision (FuelsEurope, 2016b). Further, these meetings during both the formulation and negotiation stages were with high officials from the Directorate-General of Climate Action and Energy and the Directorate-General of Internal Market, Industry, Entrepreneurship and SMEs.

FuelsEurope also took, and still takes, part in several Expert groups and forums organised by the European Commission and in one forum organised by the EP. The most relevant Expert group in the case of the EU ETS revision in which FuelsEurope took part is the Expert Group on energy-intensive industries (European Commission, 2023d). Further, FuelsEurope has participated in the European Commission's Refining Forum since 2012 (European Commission, n.d.-b). This forum aims to provide an opportunity for the EU institutions, industry, and other stakeholders to have dialogues about future EU policies and legislations that impact the oil refinery industry in the EU (European Commission, 2014d, p. 4). During the EU ETS revision, this forum held six high-level meetings, in which FuelsEurope had a presentation at four of these meetings about competitiveness and the EU refineries' role in Europe (European Commission, n.d.-b). Additionally, FuelsEurope took, and still takes, part in the European Energy Forum, which is open to all MEPs and public and private stakeholders to foster dialogue on energy matters (European Energy Forum, n.d.). FuelsEurope hosted one meeting with the European Energy Forum during the negotiation stage to discuss the European Commission's initial proposal on the EU ETS revision (European Energy Forum, 2015). FuelsEurope's participation and contributions in consultations, stakeholders' meetings, Expert groups and forums, and meetings with officials from the European Commission can be considered examples of inside strategies and tactics, as they all involve direct formal or informal contact with EU officials (Beyers, 2004, p. 213).

Other examples show that FuelsEurope used outside strategies and tactics during the formulation and negotiation stages of the EU ETS revision, however, to a much lesser extent than inside strategies and tactics. FuelsEurope published a Statistical Report once a year informing about FuelsEurope and the oil refinery sector and the added costs of EU policies such as the EU ETS (FuelsEurope, 2014a, 2015a, 2016a, 2017a, 2018). Further, during the formulation stage, FuelsEurope published one position paper on the EU ETS revision highlighting how important carbon leakage allowances are to maintaining the competitiveness of the European oil refinery sector (FuelsEurope, 2015c, p. 3). FuelsEurope also published several statements directed at EU officials from the European Commission during the formulation stage, commenting on the Market Stability Mechanism, carbon leakage and competitiveness within the EU ETS revision (Energy Intensive Industries, 2015; FuelsEurope, 2014c, 2014d). During the negotiation stage, FuelsEurope published several statements directed at EU officials from the EP, the Council, and the European Commission (FuelsEurope, 2015b, 2016d, 2017c, 2017d, 2017e). These statements highlight the importance of the free allocation of carbon leakage for the competitiveness of the EU oil refinery sector. Further, FuelsEurope published several press releases during the negotiation stage commenting on the EU ETS revision and its updates during the negotiations (FuelsEurope, 2016b, 2016c, 2017b). These reports, position papers, statements and press releases can be considered information politics as they are publicly made information meant to reach EU officials working on the EU ETS revision (Beyers, 2004, p. 214).

6.3 Channels and Targets

FuelsEurope has, during the EU ETS revision, almost exclusively been lobbying through the Brussels channel compared to the national channel during both the formulation and negotiation stages. This tracks with what they state as their goal, which is to represent *"the EU fuels and industrial value chains products manufacturing industry in the policy debate with EU Institutions and other stakeholders"*, and the fact that they only have an office present in Brussels (Transparency Register, 2023c). However, given that some of their members are national companies situated in the EU, UK, Norway and Switzerland, one could assume that FuelsEurope has done some lobbying through the national level (FuelsEurope, n.d.). Apart from this, the examples presented in the sub-chapter above show that FuelsEurope has been focusing on lobbying through the Brussels channel targeting the European Commission, the EP, and the Council through various inside and outside lobbying strategies and tactics. Further, the findings show that FuelsEurope targeted the European Commission the most compared to the EP and the Council during both the formulation and negotiation stages of the EU ETS revision. This was done by engaging in consultations, stakeholders' meetings, meetings with officials from the European Commission, Expert groups and forums, and publishing statements. Based on the findings above, FuelsEurope lobbied the European Commission more during the negotiation stage compared to the formulation stage of the EU ETS revision. Further, FuelsEurope lobbied the EP and the Council much more during the negotiation stage than in the formulation stage through informal meetings, participation in forums, and publishing of press releases and statements.

FuelsEurope mainly lobbied alone during both the formulation and negotiation stages of the EU ETS revision. However, examples show that FuelsEurope also lobbied in coalitions and through other interest groups. During the negotiation stage, FuelsEurope released

several joint statements targeting the European Commission, the EP, and the Council (FuelsEurope, 2016d, 2017c, 2017d, 2017e). These statements were also made through a homogeneous coalition. Furthermore, examples of FuelsEurope lobbying in heterogeneous coalitions were not found, which suggests that FuelsEurope mainly lobbied in homogeneous coalitions compared to heterogeneous coalitions. These homogeneous coalitions consisted of other interest groups representing different energy-intensive industry sectors. FuelsEurope were, during the EU ETS revision, a member of several interest groups such as the Alliance of Energy Intensive Industries (AEII), Alliance for a Competitive European Industry (ACEI), and Industrial Emissions Alliance (IEA), to mention a few (Transparency Register, 2023c). There are examples of FuelsEurope lobbying through the AEII during the formulation stage of the EU ETS by publishing joint statements on the ETS revision directed towards the European Commission (Energy Intensive Industries, 2015; FuelsEurope, 2014d).

6.4 Friends and Foes

FuelsEurope has arguably only lobbied its friends during the EU ETS revision, which are decision-makers with positions similar and opposed to their own (Gullberg, 2008a, pp. 2965-2966). However, some are considered more friendly than others. First, the European Commission can arguably be considered a friend. For instance, the European Commission established a Refining Forum consisting of representatives from EU Member States with the presence of the oil refining industry, the Council Presidency, MEPs, the EU refinery industry and trade unions (European Commission, 2012, p. 1). This forum intends to foster dialogues on the difficulties of the EU refinery sector and assess the need for coordinated efforts to deal with these difficulties at the EU level. FuelsEurope has been a member of this forum since its establishment and has arguably been given more access to the EU institutions through this forum during the EU ETS revision (European Commission, 2012, p. 9). Further, according to FuelsEurope, the European Commission focused on carbon leakage protection and recognised "the key role of Energy Intensive Industries in the European economy" (FuelsEurope, 2015c, p. 3). This focus was welcomed by FuelsEurope, who further highlighted the importance of the EU refinery industry for the EU economy and their security of supply. The European Commission being a friend of FuelsEurope is consistent with the assumptions and findings from previous literature (Greenwood, 2017, p. 41).

The Council can, however, be considered more of a friend of FuelsEurope, compared to the European Commission, during the EU ETS revision. In October 2014, the Council concluded that the free allocation of emissions allowances would continue during the EU ETS post-2020 to prevent carbon leakage and to ensure the industry's competitiveness (EUCO 169/14, 2014, p. 2). This conclusion was something that FuelsEurope supported and referred back to when addressing the EU ETS revision in position papers, press releases and statements during both the formulation and the negotiation stages (Energy Intensive Industries, 2015; FuelsEurope, 2014d; 2015c, p. 3; 2016d, 2017e). The European Commission limited the number of free allowances in its initial proposal, which could harm the competitiveness of the EU refinery sector, according to FuelsEurope (FuelsEurope, 2017e). It could therefore be argued that the European Commission was less of a friend than the Council for FuelsEurope in the case of the EU ETS revision.

Lastly, during the EU ETS revision, the EP can also be considered a friend to some extent rather than a foe. Firstly, as mentioned in sub-chapter 6.2 above, FuelsEurope was, and

still is, a member of the European Energy Forum. This forum gives FuelsEurope more access to exchange information on climate and energy policies that affect them, such as the EU ETS. Further, during the negotiation stage, FuelsEurope agreed with the EP's amendments to the EU ETS revision regarding the number of free allowances and the innovation fund (FuelsEurope, 2017d). This suggests that the EP amended the EU ETS revision more in favour of FuelsEurope than the European Commission's initial proposal, which again would make the EP a friend of FuelsEurope in the case of the EU ETS revision.

From exploring more in detail how FuelsEurope lobbied during both the formulation and negotiation stages of the EU ETS revision, I find that FuelsEurope mainly lobbied in line with the expectations as a specific interest. They lobbied by using more inside than outside strategies and tactics, and they found it easier to target and access the European Commission than the EP and the Council, and the European Commission was to be considered a friend of FuelsEurope throughout both the formulation and negotiation stages of the EU ETS. These findings were in line with the assumptions made. Contrary to what was expected, I found that FuelsEurope only lobbied their friends, which can be explained by the fact that all three legislative EU institutions were considered friends of FuelsEurope in the case of the EU ETS revision. Further, I find that FuelsEurope only used the Brussels channel, which is contrary to what was assumed of FuelsEurope as a specific interest. The next chapter will further discuss the lobbying of FuelsEurope compared to the lobbying of CAN Europe and assess the effectiveness of the lobbying strategies and tactics these two interest groups used during the EU ETS revision.

7 Effective Lobbying Strategies and Tactics

This chapter aims to discuss further the lobbying of CAN Europe and FuelsEurope during the EU ETS revision in detail and further assess how effectively their lobbying strategies and tactics have enabled the two interest groups to wield influence. This will be done by drawing on the analyses in Chapters 5 and 6 and by drawing on the determinants for measuring success presented in Chapter 4.

7.1 Using Different Lobbying Strategies and Tactics

The findings from the analysis of CAN Europe's lobbying during the EU ETS revision in Chapter 5 show that they lobbied differently than first assumed based on them being a *diffuse* interest. Firstly, CAN Europe did not struggle to mobilise during the EU ETS revision as assumed. At the beginning of the formulation stage of the EU ETS revision, CAN Europe had more than 120 member organisations situated in more than 30 countries in Europe and represented over 44 million citizens altogether (Climate Action Network Europe, 2015b, p. 26). In 2018, at the end of the negotiation stage of the EU ETS revision, CAN Europe had grown to represent more than 150 member organisations situated in 35 European countries, which together represent over 47 million citizens (Climate Action Network Europe, 2019, p. 46). Further, they have been able to mobilise large numbers of citizens and MEPs through their signature campaigns and petitions, mobilising nearly 100 000 citizens and over 450 MEPs urging for a more climate-ambitious EU ETS revision (Climate Action Network Europe, 2014a, 2016r). These examples, in addition to the number of member organisations, arguably demonstrate that CAN Europe have not struggled to mobilise.

Secondly, CAN Europe used more inside than outside strategies and tactics during both the formulation and negotiation stages of the EU ETS revision, which is the opposite of what was assumed. Thirdly, the findings suggest that the European Commission was easier to target during the EU ETS revision than the EP and the Council. This mainly shows through their participation in stakeholders' meetings, Expert groups and the number of meetings they had with officials from the European Commission, which was 61 in total during the EU ETS revision (Transparency Register, 2023b). Consequently, when including all these meetings, the European Commission proved to be the main target for CAN Europe during both the formulation and negotiation stages of the EU ETS revision. When focusing on the policy cycle stages, this was already assumed to be true for the formulation stage. Given their co-decision roles, it was assumed that the EP and the Council would be the primary targets for the negotiation stage, which proved to be incorrect. However, CAN Europe increasingly targeted the EP and the Council during the negotiation stage compared to the formulation stage.

Further, the assumption that CAN Europe would use both the national and Brussels channels turned out to be valid. However, they used the Brussels channel much more than the national one. I argue that this is because CAN Europe is mainly organised at the EU level, and their interests, such as climate change, are arguably affected by the EU ETS policy, which is in line with what previous literature has found (Greenwood, 2017,

pp. 26-27). Additionally, the EP and the Council could be considered friends of CAN Europe in the case of the EU ETS revision, which is consistent with the assumption made in Chapter 5. Finally, the findings suggest that CAN Europe lobbied both their friends and foes during the EU ETS revision, given that the European Commission is arguably considered a foe according to the findings.

The findings from the analysis of FuelsEurope's lobbying during the EU ETS revision in Chapter 6 show that they lobbied slightly differently than first assumed based on them being a *specific* interest. However, more assumptions turned out to be true for FuelsEurope than in the case of CAN Europe. Firstly, the findings suggest that FuelsEurope used inside strategies and tactics more than outside strategies and tactics, confirming the assumption for *specific* interests. Secondly, the findings suggest that the European Commission was easier for FuelsEurope to target and access than the EP and the Council. Thirdly, the European Commission was considered a friend of FuelsEurope during the EU ETS revision, however, to a lesser extent than the Council. This could arguably be because of the presence of the oil refinery industry in most of the EU Member States and the impact of this industry on their economies.

Further, some assumptions proved to be inaccurate according to what the findings suggested. Firstly, the findings did not indicate that FuelsEurope used both the national and Brussels channels, but rather only the Brussels channel. However, this does not necessarily mean that they do not use the national channel, as they might do so due to some of FuelsEurope's members being national companies present in several EU Member States. Secondly, the European Commission, the EP and the Council can, to different extents, be considered a friend, rather than a foe, of FuelsEurope during the EU revision. Consequently, the findings suggest that FuelsEurope lobbied only their friends, and not their foes, in the case of the EU ETS revision. This goes against the assumption that FuelsEurope, as a *specific* interest, lobbies both their friends and foes on single policies. Thirdly, the findings indicate that the European Commission was the main target of FuelsEurope both during the formulation and negotiation stages of the EU ETS revision. This, again, as with CAN Europe, only partly coheres with the assumption of expecting the European Commission to be the main target during the formulation stage and the EP and the Council to be the main targets during the negotiation stage of the EU ETS revision.

When investigating the lobbying of both FuelsEurope and CAN Europe during the formulation and negotiation stages of the EU ETS, there are both similarities and differences discovered in their behaviour. First, when looking at the differences, the findings show that CAN Europe lobbied through both the national and the Brussels channel. In contrast, FuelsEurope only lobbied through the Brussels channel during the EU ETS revision. Further, it is found that CAN Europe lobbied both their friends and foes during the EU ETS revision, while FuelsEurope only lobbied their friends. Finally, the findings suggest that the European Commission is considered a friend of FuelsEurope, but a foe of CAN Europe during the EU ETS revision. When looking at the similarities, the findings show that both CAN Europe and FuelsEurope used inside strategies and tactics more than outside strategies and tactics during the EU ETS revision. It is also found that both CAN Europe and FuelsEurope have the European Commission as their main target during both the formulation and negotiation stages of the EU ETS revision. Consequently, they both also find it easier to target and get access to the European Commission compared to the EP and the Council during the EU ETS revision. Lastly, the EP and the Council were both considered friends of CAN Europe and FuelsEurope during the EU ETS

revision. These findings suggest that there are more similarities in the lobbying behaviour of CAN Europe and FuelsEurope than differences, which is considered noteworthy given the assumptions made before the analyses, which suggested otherwise. These similarities and differences in lobbying behaviour are further illustrated in Table 2 below.

Table 2: Lobbying behaviour of CAN Europe and FuelsEurope

CAN Europe	FuelsEurope	Lobbying behaviour
✓	✓	Inside lobbying more than outside lobbying
✓	X	Using both the national and the Brussels channel
✓	✓	Easier to target and access the European Commission compared to the EP and the Council
✓	X	Lobbying both friends and foes
✓	✓	European Commission as main target during both the formulation and negotiation stages of the EU ETS revision
X	✓	The European Commission is considered a friend
✓	✓	The EP is considered a friend
✓	✓	The Council is considered a friend

Source: Author’s own compilation

However, when exploring the use of strategies and tactics more closely, I find more differences between the lobbying of CAN Europe and FuelsEurope. CAN Europe used both inside and outside strategies. Within the inside strategy, CAN Europe used tactics such as attending both formal and informal meetings with EU officials, sending letters, contributing to the European Commission’s consultations related to the EU ETS revision, and engaging in Expert groups organised by the European Commission. Within the outside strategies, CAN Europe used information politics tactics such as publishing position papers, reports, briefings, factsheets, op-eds, press releases and blog posts, and organising press briefings. Further, CAN Europe used protest politics tactics such as organising signature campaigns, petitions, and media stunts. Additionally, CAN Europe targeted both their friends, the EP and the Council, and their foes, through the use of both the national and Brussels channels. This was done by lobbying alone and in homogeneous and heterogeneous coalitions.

FuelsEurope, on the other hand, also used both inside and outside strategies and tactics, but to a lesser extent than CAN Europe. Within the inside strategy, FuelsEurope used tactics such as engaging in consultations, expert groups and forums organised by the European Commission, Forums organised by the EP, and formal and informal meetings with EU officials. Within outside strategies, FuelsEurope used only information politics tactics such as publishing position papers, reports, statements, and press releases. Additionally, FuelsEurope targeted only their friends, the EP, the Council, and the European Commission, through the only use of the Brussels channel. This was done by lobbying alone and through homogeneous coalitions. In sum, FuelsEurope and CAN Europe seem to have lobbied similarly towards the EU ETS revision on the one hand. While looking closer at the lobbying strategies and tactics used, I find that CAN Europe used a much broader set of strategies and tactics than FuelsEurope did during the EU ETS revision.

7.2 Assessing the Effectiveness of Lobbying Strategies and Tactics

This sub-chapter aims to assess the effectiveness of the lobbying strategies and tactics used by CAN Europe and FuelsEurope to lobby and influence the EU ETS. This will be done by drawing on the factors presented in Chapter 4, measuring the success of used lobbying strategies and tactics to wield influence. The first factor introduced measures the success of inside strategies and tactics by the number of *formal and informal meetings with EU officials* that the interest groups have had. The more meetings, the more success they have in wielding influence on the EU ETS revision. When counting the number of meetings that CAN Europe has had with EU officials during the two stages of the EU ETS revision through meeting with officials from the European Commission, attending stakeholders' meetings, and participating in Expert groups, it is found that they have had around 62 formal and informal meetings with EU officials. It is further found that FuelsEurope has had about 25 formal and informal meetings with EU officials through attending stakeholders' meetings, informal meetings of EU Energy Ministers, meetings with the Refinery Forum and the European Energy Forum, and meetings with officials from the European Commission. This suggests that CAN Europe have had more success using inside strategies and tactics than FuelsEurope, which had less success. This is an interesting find as one would expect FuelsEurope as a specific interest to be more well-networked than CAN Europe as a diffuse interest.

The second factor presented measures the success of outside strategies and tactics by the amount of outside strategies and tactics the interest groups have used when lobbying during the EU ETS revision. The more outside strategies and tactics used, the more potential influence on the EU ETS revision is achieved. Based on the findings, CAN Europe lobbied using both information politics and protest politics by publishing and organising several reports, position papers, briefings, op-eds, press releases, blog posts, signature campaigns, and media stunts during the EU ETS revision. FuelsEurope, on the other hand, used outside strategies and tactics far less than CAN Europe but used information politics by publishing reports, statements, and press releases. Consequently, this suggests that CAN Europe has more success using outside strategies and tactics than FuelsEurope, which had less success.

The third factor presented assesses the success of the lobbying strategies and tactics used during the formulation and negotiation stages of the EU ETS revision. If an interest group lobbies the most during the formulation stage, it results in more success, while if they lobby the most during the negotiation stage, it results in less success. When combining the outside and inside lobbying strategies and tactics used, the findings suggest that both CAN Europe and FuelsEurope lobbied more during the negotiation stage than the formulation stage. This indicates that both CAN Europe and FuelsEurope achieved less success than they would have done if they had lobbied more during the formulation stage compared to the negotiation stage of the EU ETS.

The fourth factor measures the success of the used lobbying strategies and tactics based on the number of personnel and financial resources an interest group has. Whereas the more resources an interest group has, the more success is achieved in wielding influence on the EU ETS revision. From 2014 until 2018, CAN Europe increased its personnel from 19 to 31 personnel and increased its budget from 1 239 449€ to 2 271 174 € (Climate Action Network Europe, 2015b, pp. 17-21; 2019, pp. 40-45). FuelsEurope decreased its personnel from 15 to 11 and increased its budget from 3 142 000 € to 3 871 000 €

(LobbyFacts.eu, 2015, 2019). These findings show that CAN Europe had more personnel than FuelsEurope and that FuelsEurope had more financial resources than CAN Europe during the EU ETS revision. This arguably means that both CAN Europe and FuelsEurope achieved some success, but not necessarily more or less success than the other.

The fifth factor measures the success of the used lobbying strategies and tactics by whether an interest group uses both inside and outside strategies or uses only one of them when lobbying the EU ETS revision. If an interest group uses both inside and outside strategies and tactics, it achieves more success. In contrast, if an interest group only uses inside or outside strategies and tactics, it achieves less success. The findings have proved that both CAN Europe and FuelsEurope used both inside and outside strategies and tactics, which indicates that both achieved more success.

The sixth factor presented measures the success of the used lobbying strategies and tactics by whether they were most directed through the Brussels or national channels. If an interest group lobbied most through the Brussels channel, it achieved more success, and if an interest group lobbied most through the national channel, it achieved less success. The findings suggested that both CAN Europe and FuelsEurope lobbied the most through the Brussels channel compared to the national channel when lobbying towards the EU ETS revision. This indicates that both CAN Europe and FuelsEurope achieved more success.

The seventh factor measures the success of the used lobbying strategies and tactics by combining inside and outside lobbying with whether an interest group lobbied alone, in a homogeneous coalition or in a heterogeneous coalition. If an interest group uses only outside strategies and tactics or combines them with inside strategies and tactics, they gain less success through lobbying alone, some success when lobbying in homogeneous coalitions, and more success when lobbying in heterogeneous coalitions. While if an interest group only uses inside strategies and tactics, they achieve more success when lobbying alone. The findings show that CAN Europe and FuelsEurope used both inside and outside strategies and tactics. Further, the findings show that CAN Europe lobbied alone and in both homogeneous and heterogeneous coalitions, while FuelsEurope lobbied alone and only through homogeneous coalitions. This suggests that CAN Europe achieved most success, while FuelsEurope achieved some success.

Finally, the eighth factor measures the success of the used lobbying strategies and tactics by whether an interest group lobbied their friends or foes. If they lobbied their friends, they achieved most success, while if they lobbied their foes, they achieved less success. Both CAN Europe and FuelsEurope were, according to the findings, lobbying their friends when lobbying towards the EU ETS revision, which indicates that both achieved more success. A summary of the conclusions from measuring the success of the lobbying strategies and tactics used by CAN Europe and FuelsEurope are further visualised below in Table 3.

Table 3: Success of Used Lobbying Strategies and Tactics

Measurements:	CAN Europe	FuelsEurope
The number of formal and informal meetings with EU officials.	More successful	Less successful
The number of outside strategies and tactics used.	More successful	Less successful
Lobbying more during the formulation stage compared to the negotiation stage.	Less successful	Less successful
The number of personnel and financial resources used.	Some success	Some success
Use of both outside and inside lobbying strategies and tactics versus using only one of them.	More success	More success
Using the Brussels channel more compared to the national channel.	More success	More success
Inside and outside lobbying combined with lobbying alone, in homogeneous coalitions and in homogeneous coalitions.	More success	Some success
Lobbying friends or foes.	More success	More success

Source: Author’s own compilation

When comparing the extent of success of the used lobbying strategies and tactics in enabling FuelsEurope and CAN Europe to wield influence on the EU ETS revision, I find that the lobbying strategies and tactics used by CAN Europe achieved more success in wielding influence compared to the lobbying strategies and tactics used by FuelsEurope. This is considered noteworthy as the assumption expected FuelsEurope as a *specific* interest to be more successful in wielding influence than CAN Europe as a *diffuse* interest. This result can be explained by the fact that CAN Europe used a broader selection of lobbying strategies and tactics than FuelsEurope during the EU ETS revision.

8 Conclusions

Climate change and the environment have become increasingly important and salient within the EU in recent decades. Additionally, the lobbying of EU decision-making has also increased in importance as the number of interest groups and lobbying activities on the EU level has rapidly increased during the past decades. This thesis had two aims, first, to investigate how CAN Europe, as a *diffuse* interest group and FuelsEurope, as a *specific interest* group lobbied towards the EU ETS revision. Secondly, to investigate the extent of success the used lobbying strategies and tactics had in enabling the two interest groups to wield influence on the EU ETS revision.

Consequently, the first main research question for this thesis was: *What lobbying strategies and tactics have CAN Europe and FuelsEurope used when lobbying towards the revised EU ETS Directive 2018?* By answering this question came some noteworthy findings on the lobbying of CAN Europe and FuelsEurope towards the EU ETS revision. First, I find that CAN Europe, as a *diffuse* interest, did not lobby accordingly to the assumptions driven by the conceptual framework presented in Chapter 3 (see Table 1, p. 19). The assumptions claimed that CAN Europe would struggle to mobilise, use more outside than inside lobbying strategies and tactics, find it easier to target and access the EP and the Council than the European Commission, lobby only their friends, and lobby through both the national and Brussels channel. However, the findings suggested that CAN Europe did not struggle to mobilise, which is likely because of the increased salience and importance of climate change issues making it less diffuse. I also find that CAN Europe used more inside lobbying strategies and tactics than outside strategies and tactics during the EU ETS revision, which is opposite to what was expected. The findings also suggest that CAN Europe found it easier to access and target the European Commission compared to the EP and the Council and that they lobbied both their friends and foes during the EU ETS revision, which also was not as assumed. However, it was also found that CAN Europe lobbied through both the national and the Brussels channel and that both the EP and the Council were considered as friends, which is what was assumed.

Secondly, I find that FuelsEurope, as a *specific* interest group, lobbied more accordingly to the assumptions driven by the conceptual framework compared to CAN Europe. The assumptions expected FuelsEurope to have used more inside lobbying strategies and tactics than outside strategies and tactics during the EU ETS revision, which was found to be true. Further, the findings suggest that FuelsEurope found it easier to access and target the European Commission than the EP and the Council and that the European Commission was considered as a friend, which also corresponds with the assumptions made. However, it was found that FuelsEurope only lobbied their friends and lobbied only through the Brussels channel, which is different from what was assumed. When further comparing the findings from investigating the lobbying of CAN Europe and FuelsEurope, I find that the two interest groups lobbied more equally than expected during the EU ETS revision. However, when exploring their lobbying more closely, I find that CAN Europe took use of a more diverse set of inside and outside strategies and tactics than FuelsEurope.

My second main research question for this thesis was: *To what extent have these lobbying strategies and tactics been successful and enabled the two interest groups to wield influence on the formulation and decision-making(/negotiation) stage of the legislative process?* To answer this question, I measured the success of the used lobbying strategies and tactics used by CAN Europe and FuelsEurope, which were identified by answering the first main research question of this thesis. The measurement factors were chosen based on previous literature and the conceptual framework of this thesis. I find that the lobbying strategies and tactics used by CAN Europe were more successful in enabling CAN Europe to wield influence during the EU ETS revision than FuelsEurope. Consequently, I found that the lobbying strategies and tactics used by FuelsEurope were less successful in enabling FuelsEurope to wield influence during the EU ETS revision than CAN Europe. This finding was considered as noteworthy as the assumptions made suggested otherwise. This could be explained by the fact that CAN Europe used a broader selection of both inside and outside strategies and tactics compared to FuelsEurope. This argument corresponds with findings from previous literature which suggest that the most successful interest groups are those with the broadest selection of lobbying strategies and tactics available to them (Chalmers, 2013, p. 43; Grant, 2011, p. 197). Further, I find that both CAN Europe and FuelsEurope lobby more during the negotiation stage compared to the formulation stage, which is the opposite of what the assumptions suggested. This can, however, be explained by the arguably significant differences in length between the formulation and the negotiation stages. Whereas the formulation stage lasts shortly longer than a year, while the negotiation stage lasts almost three years. Considering this, it might not be surprising that CAN Europe and FuelsEurope lobbied the most during the negotiation stage compared to the formulation stage.

The main findings from answering the two main research questions of this thesis are first that CAN Europe did not lobby as assumed as a *diffuse* interest group. In contrast, FuelsEurope mainly lobbied as expected as a *specific* interest group. Secondly, CAN Europe and FuelsEurope were found to have lobbied more similarly than expected towards the EU ETS revision. However, CAN Europe used a more diverse set of lobbying strategies and tactics than FuelsEurope. This might explain why I further find that CAN Europe's lobbying strategies and tactics were more successful than FuelsEurope's lobbying strategies and tactics in wielding influence on the EU ETS revision. These findings contribute to a better understanding of how CAN Europe and FuelsEurope lobbied and the effectiveness of their lobbying strategies and tactics to wield influence during the formulation and negotiation stages of the EU ETS. Considering this, I have arguably been able to unravel the black box of lobbying to some extent.

However, these findings are based on document analysis, which means that the results are based on publicly available documents. Further, during the collection of data, there were found more documents available on the lobbying of CAN Europe than on the lobbying of FuelsEurope. Consequently, my findings do not necessarily reflect the whole truth of how CAN Europe and especially FuelsEurope lobbied during the EU ETS revision or the extent of the success of their lobbying strategies and tactics to wield influence on the EU ETS revision. This is considered a limitation of my study, which could have been less evident if I could conduct the semi-structured interviews as initially planned. However, I argue that my method and findings give credible results that can be used in future research. Further, it would therefore be advantageous for future research to collect information that could provide more insight through other methods that could reveal information from behind closed doors, such as interviews or surveys.

Further, I find that few have investigated the lobbying of *diffuse* interest groups representing the environmental movement and *specific* interest groups representing the industry in comparison towards the EU ETS. This is puzzling, as the EU ETS is a climate policy which aims to cut GHG emissions through a market-based cap and trade system which regulates how much pollution the industry is allowed to emit (European Commission, 2023c). In addition, the EU ETS is fronted as the EU's main policy to fight climate change. Considering this, in addition to the continuing increase of interest groups and lobbying activities and the increasing importance and salience of climate issues at the EU level. I argue that the lobbying of interest groups representing the environmental movement and the industry in comparison towards the EU ETS needs to be investigated more in future research. Additionally, I find that few studies have investigated the success of lobbying strategies and tactics to enable interest groups to wield influence on the EU policy-making process. This is also surprising, as this is arguably a valuable aspect to better understand the lobbying behaviour of interest groups and the rationality of their lobbying behaviour compared to the success it gives them in wielding influence on the EU's decision-making process. Therefore, I would argue that this also is a topic that needs to be explored in future research to unravel more of the black box of lobbying.

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Appendices

Appendix 1: Information letter for CAN Europe

Appendix 2: Information letter for FuelsEurope

Appendix 3: Interview guide

Invitation to participate in the MA thesis research project

“Environmental vs. Industry interests: A comparative case study analysis of the lobbying of CAN Europe and FuelsEurope vis-à-vis the EU ETS Directive (2014-2018)”?

This is an inquiry about a participation in an MA Thesis research project. The main purpose of the thesis is to explore how CAN Europe and FuelsEurope have lobbied the 2018 revised EU ETS Directive by looking at the lobbying strategies and tactics both interest groups used. This letter provides information about the purpose of the project and what your participation, if you consent, will involve.

Purpose of the project

This project is a master thesis, which is completed to obtain a master’s degree in European Studies from the Norwegian University of Science and Technology (NTNU).

This thesis explores the lobbying strategies and tactics used towards the revision of the EU Emission Trade System (EU ETS) for phase IV (2021-2030) by looking at two interest groups, Climate Action Network Europe (CAN Europe) and FuelsEurope. Further, this thesis investigates to what extent the strategies and tactics used were successful in enabling the aforementioned interest groups to wield influence on the formulation and decision-making(/negotiation) stage of the legislative process. CAN Europe and FuelsEurope are chosen given their presence in Brussels and their extensive members network, respectively representing the environment movement and the oil industry with the EU institutions. In addition, they are found relevant for this study as they have both been engaged in the developments of the EU ETS.

The thesis has two main research questions, which are:

1. What lobbying strategies and tactics have CAN Europe and FuelsEurope used for lobbying the revised EU ETS Directive 2018?
2. To what extent have these lobbying strategies and tactics been successful and enabled the IG to wield influence on the formulation and decision-making(/negotiation) stage of the legislative process?

The thesis adopts a qualitative comparative case study analysis approach. Firstly, the thesis investigates which lobbying strategies and tactics were used by CAN Europe and FuelsEurope towards the revision of the EU ETS for phase IV (2021-2030). The period analysed starts in 2014 when the European Commission carried out consultations and ends in 2018 when the EU ETS revision for phase IV entered into force. Secondly, the thesis focuses on the strategies and tactics used during the formulation and negotiation stage of the legislative process to investigate if and to what extent they have been successful and enable the IG to wield influence during these stages. The thesis further explores the strategies and tactics used, and their perceived success in semi-structured interviews. Interviews with select representatives from the two a forementioned organizations are thus critical to the successful completion of the project. These representatives can be responsible for overall

political strategy or advocacy strategy of the organisations, or they can be policy officers or coordinators.

The data collected from the interviews will only be used in this research project. No personal data will be collected aside from the role of the interviewees in the organisation from which organisation the interviewee is from.

Which institution is responsible for the research project?

Norwegian University of Science and Technology, NTNU is responsible for the project (data controller).

The main supervisor, Professor Carine S. Germond (Norwegian University of Science and Technology, NTNU) is responsible for the research project. The research project will be written by Alessia Reina, MA student.

Why are you being asked to participate?

You are invited to an interview because of your Executive role in CAN Europe. Your position and profile will bring invaluable insights into CAN Europe's lobbying strategy and tactics.

What does participation involve for you?

If you chose to take part in the project, you will be invited for a 30-60 minutes (semi-structured) interview in April 2023, at a date and time that is convenient for you. The interview questions will address your organisation's use of lobbying strategies and tactics. The interview will include questions about your role in the organisation, how CAN Europe works, which lobbying strategies and tactics CAN Europe uses, and the perceived success of the strategies and tactics used to wield influence. The master thesis will include the role and the organisation that you as a respondent work for. This information will also be included in the research method considerations. Information pertaining to name, age and other personal information will not be published in the thesis. The interview will be recorded and transcribed, and the recordings will be deleted after the 15th of June 2023. The interview guide will be included in as an appendix in the research project and will include information about the role in the organisation and which organisation.

Participation is voluntary

Participation in the project is voluntary. If you chose to participate, you can withdraw your consent at any time without giving a reason. The only personal data that will be collected and used in the MA thesis will be your position and the organisation you work for. There will be no negative consequences for you if you chose not to participate or later decide to withdraw. If you withdraw, all information about you will be deleted and will not be used in the thesis.

Your personal privacy – how we will store and use your personal data

We will only use your personal data for the purpose(s) specified here and we will process your personal data in accordance with data protection legislation (the GDPR). The data will be stored on NTNU's office 365. This platform is NTNU's cloud storage and requires two-factor authentication to be accessed.

- In the institution Alessia Reina (student, NTNU) & Carine Germond (supervisor, NTNU) will have access to the personal data collected.
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same role in the organisation of the respondent. Only job role and organisation will be public, not name, age, gender etc.

What will happen to your personal data at the end of the research project?

The planned end date of the project is 15th of June 2023. Digital recordings and personal data that is not published will be deleted from NTNU's cloud storage.

Your rights

So long as you can be identified in the collected data, you have the right to:

- access the personal data that is being processed about you
- request that your personal data is deleted
- request that incorrect personal data about you is corrected/rectified
- receive a copy of your personal data (data portability), and
- send a complaint to the Norwegian Data Protection Authority regarding the processing of your personal data

What gives us the right to process your personal data?

We will process your personal data based on your consent.

Based on an agreement with the Norwegian University of Science and Technology, The Data Protection Services of Sikt – Norwegian Agency for Shared Services in Education and Research has assessed that the processing of personal data in this project meets requirements in data protection legislation.

Where can I find out more?

If you have questions about the project, or want to exercise your rights, contact:

- The Norwegian University of Science and Technology via Alessia Reina by email (alessia.reina@ntnu.no) or the main MA dissertation supervisor Professor Carine Germond (carine.germond@ntnu.no).
- Our Data Protection Officer: Thomas Helgesen (thomas.helgesen@ntnu.no)

If you have questions about how data protection has been assessed in this project by Sikt, contact:

- email: (personverntjenester@sikt.no) or by telephone: +47 73 98 40 40.

Yours sincerely,

Professor Carine Germond
Project Leader
(Researcher/supervisor)

Alessia Reina
MA Student

Consent form

I have received and understood information about the project “*Environmental vs. Industry interests: A comparative case study analysis of the lobbying of CAN Europe and FuelsEurope vis-à-vis the EU ETS Directive (2014-2018)*” and have been given the opportunity to ask questions. I give consent:

to participate in a semi-structured interview

I give consent for my personal data to be processed until the end of the project.

(Signed by participant, date)

Invitation to participate in the MA thesis research project

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This is an inquiry about a participation in an MA Thesis research project. The main purpose of the thesis is to explore how FuelsEurope and CAN Europe have lobbied the 2018 revised EU ETS Directive by looking at the lobbying strategies and tactics both interest groups used. This letter provides information about the purpose of the project and what your participation, if you consent, will involve.

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to participate in a semi-structured interview

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(Signed by participant, date)

Interview guide

Semi-structured interview

Introduction Information about the MA thesis, the interest and what the thesis will focus on.

It is [date]. This is Alessia Reina, MA student at NTNU. I am interviewing [name of interviewee] in [location]. This interview is being conducted as part of a MA thesis project at NTNU about lobbying strategies and tactics used towards the EU legislative process and their success to wield influence.

Warm-up questions (10 minutes)

1. Name of interviewee
2. A few words about their professional career and role in the organisation (incl. how long they have been working), and role/position at the time for the EU ETS lobbying
3. Short about the position of the organisation vis-à-vis the EU ETS.

Topic of the interview: The lobbying strategies and tactics the organisation used vis-à-vis the EU ETS and the success of the lobbying strategies and tactics used in wielding influence. Open questions

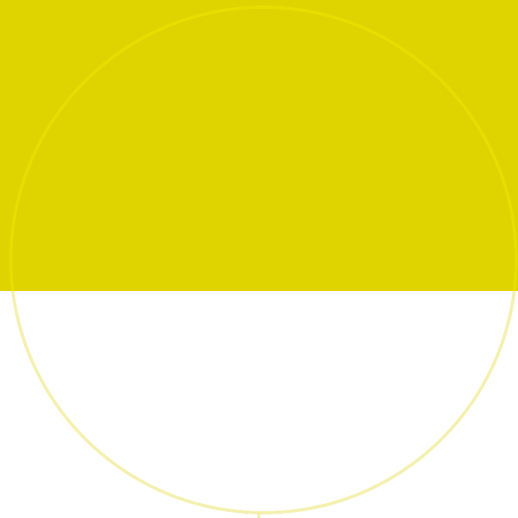
Discussion points:

Part one (30 minutes) – The lobbying strategies and tactics used vis-à-vis the revised EU ETS for phase IV (2021-2030):

- Which EU institutions did the organisation specifically target and why (in priority), and did the target change over time?
- During the early formulation of the revised EU ETS, was the European Commission a more important target than the European Parliament and the European Council?
- During the negotiations of the revised EU ETS, was the European Parliament a more important target than the European Council?
- What sort of contact did the organisation have with the EU institutions? (Personal or formal contact, through email, phone calls, meetings)
- What kinds of arguments or information did the organisation use (facts, opinion polls, academic studies, etc.)?
- Did the organisation structure a lobbying strategy related to the revision of the EU ETS phase IV?
- What role does the office in Brussels play?
- Did the organisation lobby through the use of letters, petitions, motions in the European Parliament, membership in expert groups, alliances and forums (which), and how?
- Operating alone or in coalitions, and what kinds of coalitions?
- Which lobbying strategies and tactics do the organisation prefer or prioritise and why?
- Resources (personnel and financial) allocated to execute the strategies and tactics

Part two (20 minutes) – The success of lobbying strategies and tactics to wield influence:

- What objectives did your organisation have for the revision of the EU ETS for phase IV? How (and to what extent) did you implement them?
- To what extent do you feel that the organisations lobbying strategies and tactics were successful to wield influence (i.e. realise, fully or partially, the organization's lobbying objectives)?
- Were there some strategies or tactics more successful to wield influence?
- Does the amount of resources (personnel and financial) used by the organisation affect the success of the strategies and tactics used to wield influence?
- If you had to redo it, would you do it differently, and how?



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Science and Technology