



**Hacettepe University Graduate School of Social Sciences**

**Department of International Relations**

**A COMPARISON OF GREEN 10 AND THE EUROPEAN UNION'S  
ENVIRONMENTAL POLICIES**

**Salih Tora BENZEYEN**

**Master's Thesis**

**Ankara, 2020**



A COMPARISON OF GREEN 10 AND THE EUROPEAN UNION'S  
ENVIRONMENTAL POLICIES

Salih Tora BENZEYEN

Hacettepe University Graduate School of Social Sciences  
Department of International Relations

Master's Thesis

Ankara, 2020

## DEDICATION

Hayat arkadaşım Merve'ye,  
Beni anlamlı bir birey haline getiren değerli Annem'e,  
Ve her zaman yanımda hissettiğim sevgili Ablam'a...

To my life partner Merve,  
To my mother who made me a meaningful individual,  
To my sister who I always feel with me...

## ABSTRACT

BENZEYEN, Salih Tora. *A Comparison of Green 10 and the European Union's Environmental Policies*, Master's Thesis, Ankara, 2020.

Environmental problems, especially climate change, are one of the biggest concerns that humanity has to deal with in the 21st century. In addition to the international negotiations, the regional and local efforts play a key role to implement the environmental objectives on the field. In that term, the European Union is an important actor because of its long-lasting and leading policy developments in environmental issues. The multi-level governance of the EU creates opportunities for individual citizens as well as NGOs to be involved in the policy-making process. Because of all, Europe is the focus of leading environmental NGOs (ENGOS). This study aims to analyse and compare the EU environmental policies and recommendations of Green 10 which is the coalition of ten leading ENGOS across Europe.

The study asks two main questions which are 'what was the political and social context to push ten leading ENGOS to act collectively?' and 'what are the similarities and differences between Green 10's views and the EU's environmental policies?'. In order to give answers to these questions, it firstly develops the conceptual perspective to define the Green 10 as an advocacy network and to illustrate the structure of EU multi-level governance. Then, it investigates the historical background and political development of the environmental policies in Europe. The study compares the documents for each environmental policy subject from climate change to environmental liability to reveal the Green 10's and its member ENGOS' political impact over the EU environmental policies. It also analyses the causes to act in a coalition, degree of criticism over the EU environmental policies and the future of Green 10.

### **Keywords**

Green 10, EU Environmental Policy, Climate Change, ENGOS, Advocacy Networks, European Union, Multi-level Governance

## ÖZET

BENZEYEN, Salih Tora. *Yeşil 10 ve Avrupa Birliği Çevre Politikalarının Karşılaştırılması*, Yüksek Lisans Tezi, Ankara, 2020.

Çevre sorunları, özellikle de iklim değişikliği, 21.yüzyılda tüm insanlığın yüzleşmek zorunda olduğu en endişe verici sorun olarak karşımıza çıkıyor. Böylesi bir süreçte uluslararası müzakerelerin yanı sıra bölgesel ve yerel çabalar, çevresel hedeflerin uygulanması noktasında önemli bir rol oynuyor. Bu noktada, Avrupa Birliği, çevre politikaları konusundaki uzun geçmişi ve üstlendiği öncül rolü ile süreçte önemli bir aktör olarak karşımıza çıkıyor. Özellikle AB'nin çok katmanlı yönetim anlayışı hem bireylerin hem de STK'ların politika yapım süreçlerine katılımlarına imkan yaratıyor. Tüm bunlardan dolayı çevre STK'ları için Avrupa odak noktası haline geliyor. Bu çalışma, AB'ye odaklanmış on öncül çevre örgütünün oluşturduğu Yeşil 10 isimli koalisyon ile AB'nin çevre politikaları arasındaki ilişkiyi karşılaştırarak analiz etmeyi amaçlıyor.

Çalışmanın temelde sorduğu iki soru bulunuyor. Bunlar 'bu on çevre STK'sını birlikte hareket etmeye iten politik ve sosyal şartlar nelerdir?' ve 'Yeşil 10 koalisyonunun önerilerinin, AB çevre politikaları ile benzerlikleri ve farklılıkları nelerdir?'. Bu soruların cevaplarına ulaşmak için, çalışma öncelikle Yeşil 10'u bir savunuculuk ağı olarak konumlandırın kavramsal yaklaşımı tanımlıyor ve AB'nin çok katmanlı yönetiminin yapısal detaylarını ortaya koyuyor. Daha sonra ise, Avrupa'daki çevre politikalarının tarihsel arkaplanını ve gelişimini detaylandırıyor. Çalışma, iklim değişikliğinden çevresel sorumluluğa kadar tüm çevre başlıkları dahilinde, Yeşil 10'a ait dökümanları ve çevre anlamındaki AB yasal mevzuatın karşılaştırarak inceliyor. Böylece, Yeşil 10'ın ve üye çevre STK'larının, AB çevre politikaları üzerinde oluşturduğu politik etkiyi ortaya koyuyor ve üye örgütlerin ortak hareket etmelerinin sebeplerini, eleştiri düzeylerini ve Yeşil 10 koalisyonunun geleceğini açıklıyor.

### **Anahtar Sözcükler**

Yeşil 10, AB Çevre Politikaları, İklim Değişikliği, Çevre STK'ları, Savunculuk Ağı, Avrupa Birliği, Çok Katmanlı Yönetişim

## TABLE OF CONTENTS

ACCEPTANCE AND APPROVAL .....	i
YAYIMLAMA VE FİKRİ MÜLKİYET HAKLARI BEYANI.....	ii
ETİK BEYAN .....	ii
DEDICATION.....	iv
ABSTRACT .....	v
ÖZET .....	vi
LIST OF ABBREVIATIONS .....	x
LIST OF TABLES AND FIGURES .....	xi
INTRODUCTION .....	1
CHAPTER 1: CONCEPTUAL FRAMEWORK AND RESEARCH METHODS .....	7
1.1. RESEARCH QUESTIONS AND METHODS .....	7
1.1.1. EU Sourced Documents .....	8
1.1.2. Green 10 Sourced Documents.....	9
1.2. BACKGROUND OF THE PROBLEM .....	11
1.3. THE STRUCTURE OF ENGOS.....	12
1.4. CONCEPTUAL PERSPECTIVE TO ADVOCACY NETWORKS .....	15
1.5. DIFFERENCES BETWEEN ADVOCACY NETWORKS, INTERESTS GROUPS AND EPISTEMIC COMMUNITIES .....	19
1.6. MULTI-LEVEL GOVERNANCE OF THE EU .....	24
1.7. THE METHODS OF ADVOCACY NETWORKS TO ENGAGE MULTI-LEVEL GOVERNANCE .....	29
CHAPTER 2: THE HISTORICAL AND SOCIAL CONTEXT.....	31
2.1. THE EMERGENCE OF THE EU ENVIRONMENTAL POLICY.....	31
2.2. THE RISE OF ENVIRONMENTAL NGOS IN EUROPE.....	36
2.3. HOW DO THE ENGOS INVOLVE IN THE POLICY-MAKING PROCESS OF THE EU?.....	38

<b>CHAPTER 3: POLICIES AND PRINCIPLES OF GREEN 10 .....</b>	<b>43</b>
<b>3.1. THE EMERGENCE OF GREEN 10 .....</b>	<b>43</b>
<b>3.2. THE MEMBERS OF GREEN 10.....</b>	<b>48</b>
3.2.1. CEE Bankwatch Network .....	49
3.2.2. BirdLife Europe and Central Asia .....	50
3.2.3. Climate Action Network (CAN) Europe .....	52
3.2.4. EEB European Environmental Bureau.....	53
3.2.5. Friends of the Earth Europe.....	54
3.2.6. Greenpeace Europe Unit .....	55
3.2.7. Health and Environment Alliance (HEAL).....	56
3.2.8. Naturefriends International .....	57
3.2.9. Transport & Environment.....	57
3.2.10. WWF European Policy Office.....	58
<b>3.3. GREEN 10 AS AN ADVOCACY NETWORK.....</b>	<b>59</b>
<b>CHAPTER 4: AN ANALYSIS OF GREEN AND THE EU</b>	
<b>ENVIRONMENTAL POLICIES .....</b>	<b>63</b>
<b>4.1. THE SUMMARY OF ENVIRONMENTAL LAWS OF THE EU .....</b>	<b>63</b>
4.1.1. Climate Change .....	64
4.1.2. Protection of Nature and Biodiversity .....	67
4.1.3. Pollution.....	68
4.1.4. Water and Soil Protection .....	69
4.1.5. Other Related Policies .....	69
<b>4.2. ANALYSIS .....</b>	<b>71</b>
<b>4.2.1. The Relationship between the Members of Green 10 and the EU.....</b>	<b>73</b>
4.2.1.1. Financial Dependency .....	73
4.2.1.2. Meetings of Green 10 with the Commission .....	74
4.2.1.3. Consultative Status .....	74
4.2.1.4. An Analysis of the Relationship between Green 10 and the EU.....	77
<b>4.2.2. The Subject-Focused Analyses .....</b>	<b>78</b>
4.2.2.1. Climate Change .....	80
4.2.2.2. Nature Protection and Biodiversity .....	84
4.2.2.3. Pollution and Resource Management .....	88



4.2.2.4. Chemicals .....	93
4.2.2.5. Energy.....	95
4.2.2.6. Transport.....	100
4.2.2.7. Maritime Affairs and Fisheries .....	104
4.2.2.8. Food Safety .....	106
4.2.2.9. Transparency .....	109
4.2.2.10. Sustainable Development .....	111
4.2.2.11. Budget.....	114
4.2.2.12. Environmental Liability .....	116
<b>CONCLUSION .....</b>	<b>122</b>
<b>REFERENCES .....</b>	<b>126</b>
<b>APPENDIX 1 – The List of Environmental Related Green (G) and White (W) Papers .....</b>	<b>145</b>
<b>APPENDIX 2 – The List of Documents that Published by Green 10 between 1999 and mid-2019 .....</b>	<b>147</b>
<b>APPENDIX 3 – The List of Consultations that Green 10 Members Contributed .</b>	<b>152</b>
<b>APPENDIX 4 – The Timeline of Major Environmental Developments in Europe between 1950s and 1990s .....</b>	<b>155</b>
<b>APPENDIX 5 – Originality Report .....</b>	<b>158</b>
<b>APPENDIX 6 – Ethics Commission Waiver Report Form.....</b>	<b>160</b>

## LIST OF ABBREVIATIONS

ACF	Advocacy Coalition Framework
CAN	Climate Action Network
CFP	Common Fisheries Policy
DGs	Directorate-Generals
EAP	Environmental Action Programme
ECCP	European Climate Change Programme
ECOSOC	Economic and Social Council
EEB	European Environmental Bureau
EEC	European Economic Community
EEN	EPHA Environmental Network
EIB	European Investment Bank
ENGO	Environmental Non-governmental Organization
EP	European Parliament
ETS	Emission Trading System/Scheme
EU	European Union
FoEE	Friends of the Earth Europe
GMOs	Genetically Modified Organisms
GHGs	Greenhouse Gases
HEAL	Health and Environment Alliance
IUCN	International Union for Conservation of Nature
MLG	Multi-level Governance
NFI or IFN	Naturefriends International
NGO	Non-governmental Organization
SEA	Single European Act
T&E	Transport & Environment
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change
UNEP	United Nations Environment Programme
WTO	World Trade Organization
WWF EPO	World Wildlife Fund European Policy Office

## LIST OF TABLES AND FIGURES

<b>Table 1</b>	Key features of advocacy networks
<b>Table 2</b>	The major strategies of advocacy networks
<b>Table 3</b>	The stages of network influence
<b>Table 4</b>	The members of Green 10 according to focus areas, budget and percentage of the EU funds as of 2018-2019
<b>Table 5</b>	The list of major binding legal acts on climate change
<b>Table 6</b>	The list of major binding legal acts on protection of nature and biodiversity
<b>Table 7</b>	The list of major binding legal acts on pollution and waste management
<b>Table 8</b>	The list of major binding legal acts on water and soil protection
<b>Table 9</b>	The list of major binding legal acts on Energy, Transport, Maritime Affairs & Fisheries and Food Safety
<b>Table 10</b>	Membership Status of Green 10 Members to the Commission Expert Groups as of 2019
<b>Figure 1</b>	The number of binding legal acts on the environmental issues between 1999 and 2019
<b>Figure 2</b>	The number of public consultations on the environmental issues between 2013 and 2019
<b>Figure 3</b>	The number of public consultations that Green 10 members contributed between 2014 and 2019
<b>Figure 4</b>	The number of ENGOs registered in the Transparency Register between 2008 and 2019
<b>Figure 5</b>	The number of organisations working on top 10 topics of 2019
<b>Figure 6</b>	The percentage of EU funds on the budget of Green 10 members as of 2018
<b>Figure 7</b>	Distribution of Commission Representatives who chair the meetings with Green 10 between 2014 and 2019
<b>Figure 8</b>	The number of meetings of the Green 10 Members with the Commission between 2014 and 2019

## INTRODUCTION

The Earth is a fragile and vulnerable planet. Since the industrial revolution, human beings have evolved from being a part of it to the most important threat to it. The increasing industrial production and human population resulted with high demand for energy and finally resulted with increasing fossil fuel consumption. Today, several environmental problems are threatening the future of each living creature and inorganic elements of this planet. Climate change, loss of biodiversity, habitat destruction, plastic pollution, nuclear wastes and many others are on the list as threats to the future of the Earth, but it is not too late for action.

On the other hand, states have a different agenda. International political system dominated by nation-states is busy with human-related challenges like economy, civil war, terrorism, human rights etc. In that context, the European Union is a significant example in the world to deal with these various problems in harmony. The search for peace and democracy-oriented process of European states resulted in an economic union and covered all other topics as a spill-over effect in the last 50 years. Today, the EU is a unique example of international cooperation with its supranational features. The decision-making process starts from the local and affects the local again at the end. Especially in the environmental policies, the policy-making and implementation process shows unrivaled examples for the international environmental negotiations.

However, European citizens are not satisfied with the works of European Commission on the environment ("Institute for European Environmental Policy," 2019). According to current surveys, 40% of the respondents state that the environment is a key priority of the future of the EU. Similarly, within the EU27, 47% of the young people among 16 to 25 years old care mainly about the environment (E. de Vries & Hoffmann, 2019). In terms of climate change, these rates increase dramatically and more than 70% of the European citizens agree that climate change is the most important threat in this century (European

Commission, 2019a). So it needs more research and investigation to understand how the EU will take action for the future of the planet.

The EU's environmental policies consist of several pillars including air, chemicals, circular economy, climate change, cities, energy, industry, land and soil, marine and coastlines, nature and biodiversity, noise, research and innovation, transport, waste and water. Each of the topics comprise detailed subtitles. For example, in terms of the climate change issue, the EU works on emissions monitoring and reporting, low carbon innovation and funding for climate action. Similarly, in the nature and biodiversity topic, it works on species protection, Natura 2000 protected areas, green infrastructures and many others.

The EU environmental policy-making is a multilateral process. The preparation of the proposal and implementation in local needs different actors with wide ranging expertise. At that point, the environmental NGOs (ENGOS) have a crucial role. After the 1970s, the global environmental movements started to increase and the ENGOS have been located in the centre of all processes in different roles like activist, scientific or policy advisor, or just as the voice of ordinary citizens. Today, ENGOS play a key role for the environmental agenda of international politics as well as EU's environmental policy. When we consider that the largest ENGOS are located in the European continent, it becomes more important to research the EU environmental policies and the impact of ENGOS to these processes. The multi-level governance in the EU with the active participation of ENGOS could create positive impacts for better regulation and legislation to deal with environmental problems. In that term, the study tries to evaluate the relation between these actors.

In this study, the leading actor is the Green 10 coalition. It is an informal coalition of ten leading environmental NGOs active at the EU level. The coalition was formed in 1999 as the Group of 8 (or Green 8) with the participation of BirdLife Europe and Central Asia, Climate Action Network (CAN) Europe, European Environmental Bureau (EEB), Friends of the Earth Europe,

Friends of Nature International, Greenpeace European Unit, T&E (Transport and Environment) and WWF European Policy Office. In the last 20 years, the coalition first evolved to Green 9 and finally to Green 10 with the involvement of Bankwatch Network and Health and Environment Alliance (HEAL) to the coalition. The main aim of the coalition is to coordinate joint responses and recommendations to EU decision makers on environmental issues. In exchange for their scientific, technical and legal expertise to decision-makers, the coalition gets access to and even influence over EU environmental policies. The combined membership of the Green 10 is more than 20 million people. The Green 10 actively interact with the EU policy-making institutions which are the European Commission, the European Parliament and the Council of Ministers to influence environmental policies. There are three main focuses of the coalition. First of all, it encourages the full implementation of EU environmental laws in the Member States. Secondly, it lobbies for new proposals on environmental issues and works with the related EU institutions to ensure that policies under consideration are as environmentally effective as possible. Thirdly, it promotes EU environmental leadership in international environmental politics (Green 9, 2005a).

Besides, the Green 10 aims “to raise public awareness by informing their members and the wider public of environmental developments at the EU level and encourage them to make their voice heard”. At the same time, it gives “a voice to locally-based associations, which would otherwise have no access to EU decision-makers and contribute to the strengthening of civil society across Europe through providing training in advocacy skills, policy analysis and the EU decision-making process”. In that context, the Green 10, as an umbrella and consultative organization in the EU, follows the decision-making process closely and reflects the coalition’s views by taking into account the views of European citizens, local associations and its members.

In this research, the Green 10 classifies as an advocacy network. Briefly, an advocacy network means issue focused structures which are acting collectively

to create impact on the decision makers and policy agendas. These structures are mostly long-term partnerships and involve committed and knowledgeable actors. The low institutionalized structure, reliability on the strength of information, flexibility and adaptability on fast-changing environmental issues, voluntary and horizontal cooperation are some of their features. Like in the case of Green 10, the participants of the advocacy networks could be NGOs or other governmental or non-governmental organisations. Advocacy networks aim to create a change in the behaviour of decision-makers and use various strategies. By doing that, the network gains the ability to attract media attention, donor support and membership which strengthen its capacity of influence (Stone, 2002, p. 8). In this sense, Green 10 positions on consultant and inspector roles on the policy-making process of environmental policies in the EU. They prepare policy proposals, position papers, technical reports as well as open letters to the president of the Commission and related Commissioners to present their views on several issues. Even if the member ENGOs of Green 10 are sharing different niches, they act harmonically on the common issues of the environment.

On the other hand, the EU environmental policies are on the positive tendency in terms of economic development and nature conservation. The practical changes like the ban on single use plastics and the transition from coal powered power plants to renewable energy resources are important examples for the EU's position on the environmental policy developments across the world. All these developments in the last 20 years, have parallels with the evolution of Green 10 from Green 8.

Overall, it is clear that there is an increasing interaction between EU institutions and ENGOs in terms of policy-making on environmental policies. Additionally, according to authors, there is an increasing trend in European NGOs to act in coalition (Coen, 2007, p. 340). However, the academic studies are limited and mostly focused on lobbying on the EU institutions and participation of non-environmental NGOs in policy-making processes (Ciplet, 2014, p. 77). There is

no academic research that focuses on Green 10 or any other specific environmental advocacy network and ENGOs in the EU policy-making. The ones that Green 10 mentioned are very limited and superficial. In the study of Daphne Biliouri's "Environmental NGOs in Brussels: How Powerful are Their Lobbying Activities?", Green 10 had been referred under the title of umbrella organizations as Green 8 (Biliouri, 1999). In another study dated 2012, Green 10 had been very shortly mentioned in less than 2 pages with limited information based on its official website, although the chapter titled as "Environmental Nongovernmental Organization Coalitions: How the Green 10 Influences European Union Institutions" (Ceballos, de Lange, Haro, & Salazar, 2012). In terms of Turkish literature, Green 10 had been mentioned three times in the doctoral dissertation of Selma Şekercioğlu in 2016 as the membership status of members ENGOs of Green 10 like WWF and Greenpeace (Şekercioğlu, 2016, pp. 22, 84, 142).

The informal status of the Green 10 like networks could be the key reason for this situation. It needs more issue-focused studies (Newig & Fritsch, 2009, p. 198). So, the participation of Green 10 in the EU's multi-level governance on environmental policies is an original research topic which needs a comprehensive analysis and this research will make an important contribution to the literature of advocacy networks.

There are a total of four chapters in the study. In the first chapter, a conceptual framework represents the understanding of the relationship between the ENGOs and the EU. The research methods and documents for the analysis details in this chapter. Later, the chapter explains the roots of the problem, the structure of ENGOs in the context of democratization, active citizenship and development of civil society. Then, it argues on the advocacy networks in comparison with epistemic communities and interest groups from the conceptual perspective. Lastly, it defines the multi-level governance approach and illustrates the differences with intergovernmentalism and neofunctionalism,



while represents the methods of advocacy networks to engage in multi-level governance.

In the second chapter, the historical background of environmental policy in Europe from the European Economic Community to the European Union is detailed. The role of the ENGOs in this process is to be analysed in parallel to major environmental developments in Europe. Then, the ways that ENGOs are engaged in the policy-making process are examined. In the third chapter, policies and principles of Green 10 as an advocacy network are elaborated in terms of its foundation, objectives, members, study areas, etc. It is a comprehensive chapter to understand the main features and policies of the Green 10 coalition.

In chapter four, the relationship between Green 10 and the EU environmental policy is examined through several variables. Firstly, it summaries the major environmental legislation of the EU, according to each policy area. After that, it defines the structural connection between the Green 10 and the EU via financial dependency, participation in meetings, membership to the expert groups as well as the number of public consultations that the member ENGOs have contributed. Finally, it elaborates on the evolution of each environmental policy area in time and defines the interactions between two actors in the legislation process. The study concludes with a discussion and suggestions for further research.

## **CHAPTER 1**

### **CONCEPTUAL FRAMEWORK AND RESEARCH METHODS**

In this chapter, the conceptual framework of the study is presented to understand the relationship between environmental NGOs, advocacy networks and the EU and also describe the research methods. The chapter firstly defines the research questions and methods of the thesis. Then, it explains the background of the problem and the structural features of ENGOS from different viewpoints such as democratization, active citizenship, development of civil society and the effectiveness of lobbying activities. After that, it illustrates the conceptual perspective to the advocacy networks via comparison with interest groups and epistemic communities. Finally, it comparatively examines the multi-level governance approach with intergovernmentalism and neofunctionalism and argues the methods of advocacy networks to engage in the multi-level governance of the EU.

#### **1.1. RESEARCH QUESTIONS AND METHODS**

For this research, there are two sets of questions. In the first place, each ENGO in the coalition is powerful, well-known by public and far-reaching organizations. Which political developments or structural changes have been affecting these NGOs to be a member of such an advocacy coalition? In the historical and social context, do the milestone events like the Kyoto Protocol, ozone depletion or acceleration of climate change affect the foundation of Green 10?

In the second set, it asks what does the Green 10 recommend to the environmental legislation and how much of its recommendations are taken seriously? What are the similarities and differences between the Green 10 recommendations and EU's environmental legislation?

In terms of the research questions, there are two hypotheses of this study;

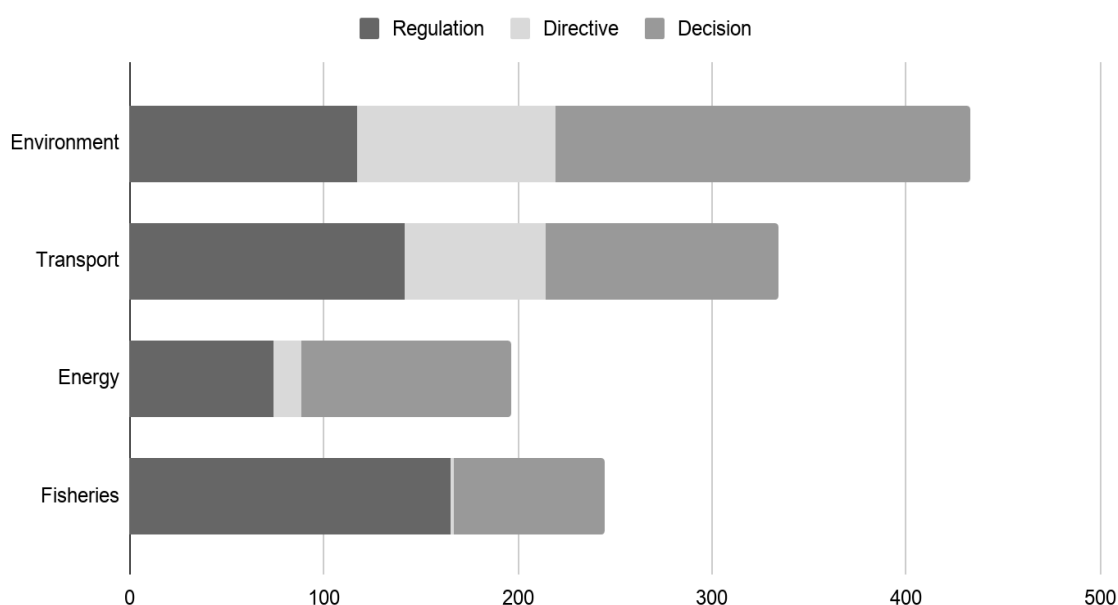
1. Green 10 and its member ENGOs actively participate in the policy-making process on environmental issues in the EU. Especially, they engage in the proposal period of the legislation through various ways. So, it is hypothesized that Green 10's recommendations and EU environmental policies show similarities, especially on the nature protection and climate change subjects.
2. The financial dependency of member ENGOs to the EU funds determines the criticism level of them over the EU environmental policies. However, acting as a network in the name of Green 10 gives them the ability to criticize the EU more freely. Thus, it is hypothesized that advocacy networks such as Green 10 are able to criticize EU policies more than others.

This study limits its research period to the last 20 years. It starts from 1999 which is the known foundation date of Green 10 and ends in the beginning of 2019 with the 2019 European Parliament elections. It does not include the Ursula von der Leyen Commission.

### **1.1.1. EU Sourced Documents**

The thesis examines the documents via comparison and analysis of official documents to understand the impact of Green 10 on the EU environmental legislation. In terms of the EU sourced documents, there are Regulations, Directives and Decisions which are binding legal acts and Green/White Papers which are not binding but important for the creation of legal acts (European Union, 2012a). More than a thousand binding legal acts on environment, transport, energy and fisheries had been scanned for the analysis. Additionally, nearly 150 Green and White Papers had been included to the analysis (Appendix.1). All the EU sourced documents are open source through the EUR-Lex website which offers access to EU laws (EU Publications Office, n.d.).

**Figure 1.** The number of binding legal acts on the environmental issues between 1999 and 2019



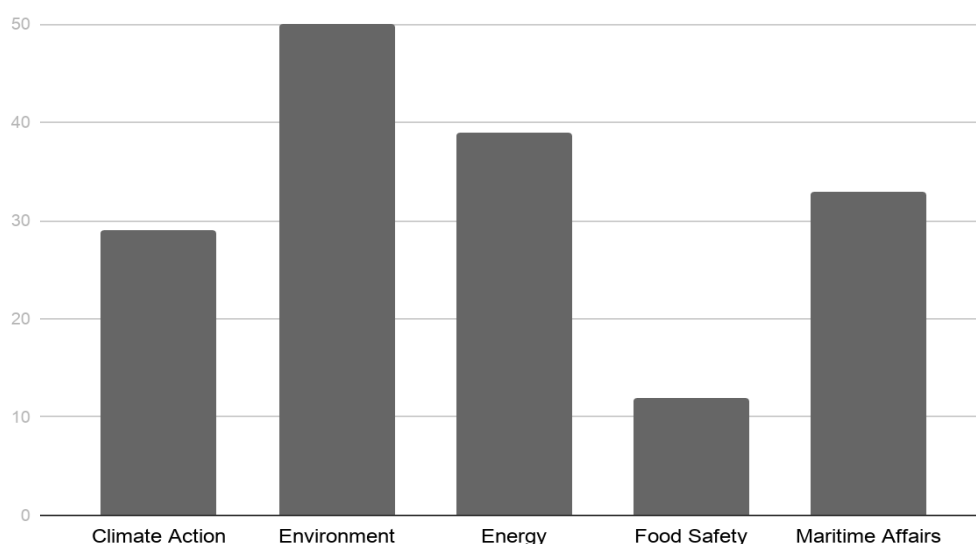
**Source:** Author's compilation from the official website of EUR-Lex

### 1.1.2. Green 10 Sourced Documents

Since its foundation, Green 10 shares several documents that reflect their view, recommendations and evaluations for the environmental policies of the EU. As the Green 10 secretariat had been confirmed through the email, there are 63 public documents which bear the Green 10's signature (A. Zimoch, personal communication, October 10, 2019). They comprise open letters, policy proposals, position papers, reports, press statements, manifestos and presentation documents (Appendix.2). All documents are open sourced. However, they are not systematically accessible through its website because of lack of archive (Green 10, n.d.-a). Similarly, the member ENGOS do not publish the documents on their website in an order. Additionally, there are documents that Green 10 members shared their recommendations through the EU Consultations which is the public consultation tool of the EU Commission (European Commission, n.d.-a). It is the public consultation tool of the EU

Commission in the frame of “Better Regulation” principle since 2013. From citizens to governments and NGOs to business representatives, everyone is able to submit their opinions on the scope and priorities of EU Action or evaluations of existing policies and laws via EU Consultations (European Commission, n.d.-a). For this research, more than 150 consultation openings in the environmental issues between 2013 and 2019 had been scanned. 39 of these consultations which Green 10 members contributed had been included in the analysis.

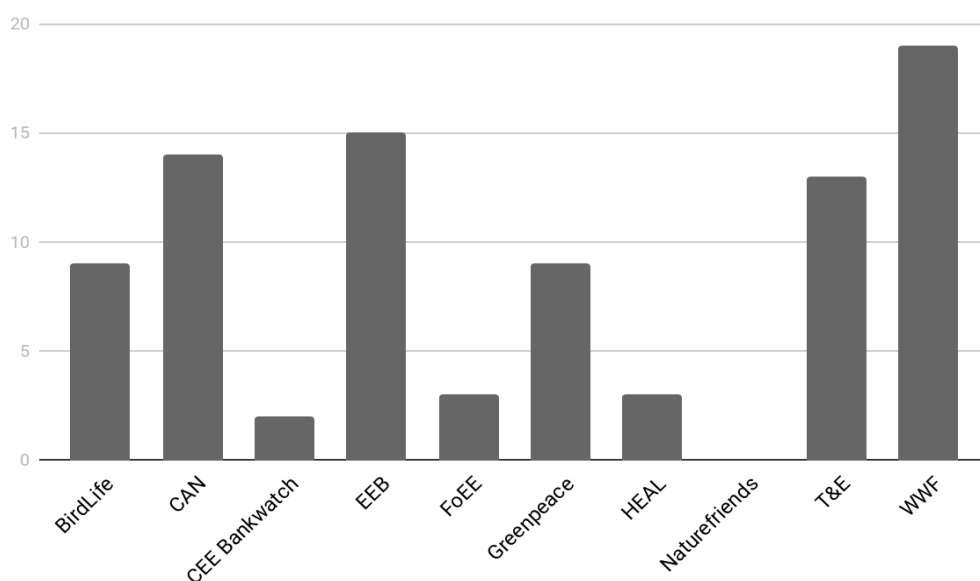
**Figure 2.** The number of public consultations on the environmental issues between 2013 and 2019



**Source:** Author's compilation from the official website of EU Consultations

Nevertheless, there is no consultation that the Green 10 had contributed as a group. All of the contribution on 39 subjects made by the members of Green 10 (Appendix.3).

**Figure 3.** The number of public consultations that Green 10 members contributed between 2014 and 2019



**Source:** Author's compilation from the official website of EU Consultations

During the analysis, the documents had been classified according to the subjects which are detailed in 12 titles. They are nature protection and biodiversity, climate change, pollution and resource management, chemicals, energy, transport, maritime affairs and fisheries, food safety, transparency, sustainable development, budget and environmental liability. The specific recommendations of Green 10, for example the emission limits for new cars or restricted chemicals on GMOs, had been highlighted and compared with the EU legislation. In terms of the EU legal acts, prominent features for each related act had been taken into consideration instead of full texts with technical details.

## 1.2. BACKGROUND OF THE PROBLEM

Why is it so important to understand the impact of ENGOs on EU environmental policies? The influence and participation in policy-making processes are critical for the success of outcome, i.e. the policies and regulations. The increasing

participation of citizens via interest groups in the policy-making process in Europe helps us to evaluate the success of policies itself and understand the roots of democratic environment in the EU (Michalowitz, 2007, p. 141). It also means more democratic societies, increasing active citizenship and legitimacy of the policy-makers (Junk, 2015, p. 252). Otherwise the political environment with democratic features in the society could be interrupted and a unilateral political atmosphere could emerge.

As an advocacy network, the Green 10 joins the policy-making process by formal and informal methods and shares its position or proposals with EU institutions. However, it is not clearly known how much influence they could create on the decision-makers. Authors argue that even if the element of pressure, the ENGOs in that case, create influence and make changes on policies, the causes of this change can be elusive and need further investigation (Margaret E. Keck & Sikkink, 1999, p. 98). The debate on access and influence emerges from that point. Even if ENGOs access decision-makers by lobbying or through other methods, the influence which they could create on the decision-makers is a matter of debate (Tallberg, Dellmuth, Agné, & Duit, 2015, p. 221).

In that context, the Green 10 coalition shows similar features. The increasing participation of ENGOs for the common aims of environmental protection helps to create integrated and strong democratic solutions for the common problems. When the member organizations of the Green 10 are analyzed, it is clear that each of them has different niches from environmental advocacy to scientific expertise. Even sometimes, we witness institutional conflicts on some critical issues. Nevertheless, they work in coalition for mutual aims for quite a longtime (Rozbicka, 2013, p. 847).

### **1.3. THE STRUCTURE OF ENGOS**

It is important to understand the reasons for existence and the structural features of ENGOs to evaluate their impact on decision-makers and

environmental policies. This will help us to correlate the evolution of ENGOs to advocacy networks as well as their position on multi-level governance of the EU.

In ideal communities, governments conduct all necessary environmental actions to develop the social benefits and enhance the welfare of their citizens. These necessary activities consist of the creation and implementation of policies, presentation of the goods and services and protection and development of these goods and services by the governments (Kulin & Johansson Sevä, 2019, p. 111). However, these actions may not satisfy the expectations of the community, or the quality of goods and services could be low. In those cases, the ENGOs engage in environmental issues and the individuals interfere by supporting these ENGOs. Nevertheless, these support could not be enough to develop the ENGOs capacity, in terms of economical, legal and administrative, in comparison to decision-makers. Therefore, ENGOs use community support to create impact on decision-making mechanisms by lobbying activities (Handy, 2001, p. 649).

There are several objectives of ENGOs for lobbying. First of all, they aim to make political pressures on the decision makers to change or modify the existing legislation and regulations. Secondly, through various institutions and actors, the ENGOs monitor and criticize the governmental activities on environmental issues. Lastly, the ENGOs focus on the public as an external actor in the decision making process. They organize education activities, awareness raising events, etc. to change the public opinion and behaviour as a result (Handy, 2001, p. 651). To apply these objectives, ENGOs need various structural strengths like institutionalization, technical and moral capacity and suitable external conditions such as “complexity of the issue, policy type, the status quo, salience, the degree of conflict, the size and composition of lobbying coalitions” (Klüver, Braun, & Beyers, 2015, p. 453).



Authors argue that institutionalization is one of the key factors that determines the influence capacity of an ENGOs and there are two types of institutionalization (Berny & Rootes, 2018, p. 958). Firstly, internal institutionalization means the structural development in terms of management, finance, and bureaucratic skills represents key features of the institutionalized organization. Secondly, external institutionalization implies that being an organization to be consulted for its expertise is an important indicator of institutionalization. For example, the European Environmental Bureau (EEB), the member of the Green 10 coalition, was accepted as an actor on the decision-making process by the European Commission in 1974. Governments or institutions acknowledge these institutionalized ENGOs as authoritative voices and sources of expertise. On the other hand, if ENGOs do not become deeply institutionalized but take radical positions, they challenge mainstream politics. In that case, they do not directly impact the environmental policy but take actions to change the behaviours in society.

In the context of institutional capacity, it is important to mention the funding sources and their effects on the ENGOs lobbying. A detailed explanation of the funding sources of the Green 10 and its members take part in the following chapters. However, from a theoretical perspective, there is a debate on the correlation between the source of funding and the behavioural change of organization in line with the source's interests and behaviours (Bloodgood & Tremblay-Boire, 2016, p. 403).

While the organizational features play a significant role in ENGOs' influence capacity, it is not the only factor. The external context/circumstances apart from the organization is also a key factor that affects the lobbying ability of the organization. The complexity and salience of the issue that be concerned, the number and characteristics of the actors, the formal and informal links between these actors, the degree of conflict and the features of coalitions that involve lobbying also affect the lobbying ability and success (Bunea, 2012, p. 555).

#### 1.4. CONCEPTUAL PERSPECTIVE TO ADVOCACY NETWORKS

As maintained by some authors, the ENGOs have a mediating position between society and the government. They try to influence the decision makers to reflect the view of the organization as well as their supporters (Junk, 2015, p. 238). However, even if the ENGOs are strong enough to influence the decision makers, the EU has a multi-level decision making mechanism and involves various actors (Daniell & Kay, 2017, p. 11). So, an ENGO cannot be influential enough to shape the policies according to its objectives and thus, it needs to develop its political capacity to increase its impact. Especially in multilateral issues like the environmental ones, it needs the cooperation of multiple actors. Advocacy networks have emerged out of this necessity.

An advocacy network defined as “an organization which involves independent, committed and knowledgeable actors working in specialized issue areas to act cooperatively for influencing the policy-makers in a long-standing partnership” (Mazey & Richardson, 1992, p. 117). These actors could be various governmental or private organisations like institutions, agencies or NGOs or business groups and their level of organization could be national, regional or international (Sabatier, 1998, p. 103).

Advocacy networks aim to reshape the climate of public debate and influence policy agendas of decision-makers. They are called ‘advocacy’ networks because they “advocate pleading the causes of others or defending a cause or propositions” (Keck & Sikkink, 1998, pp. 217-238). The main objective of these networks is the collaboration of the knowledge to create a change in the behaviour of decision-makers which could be governments, companies, or institutions of intergovernmental organizations like the EU (Keck & Sikkink, 1999, p. 90). By doing that, the network gains the ability to attract media attention, donor support and membership which strengthen its capacity of influence (Stone, 2002, p. 8).

According to Advocacy Coalition Framework (ACF), the advocacy coalitions show up with participation of several policy actors which are sharing similar policy core beliefs (P. Sabatier & Weible, 2007, p. 215). They organize around campaigns for a common goal by mobilizing concerned actors (M.E. Keck & Sikkink, 1998, p. 223). To achieve any prospect of success, these policy actors share resources, develop complementary strategies and coordinate joint actions. This gathering and collective action provide useful tools for the member organizations which are involved in a policy subsystem (P. Sabatier & Weible, 2007, p. 196).

Even if advocacy networks emerge, it needs to explain the motivation of the network for its continuity. According to Sabatier, the low transaction costs of participating, the low level of coordination and exaggerated benefits of participation to the network stick the members to each other. These also prevent “the free-rider problem” and present impartial responsibilities to members (P. Sabatier & Jenkins-Smith, 1999, p. 125). Additionally, because advocacy networks are communicative structures for policy exchange, the information disseminated among members plays a binding role for the network members and helps for the network’s effectiveness (M.E. Keck & Sikkink, 1998, pp. 217-238).

The ACF argues that the advocacy networks use several resources to influence public policy and policy-makers. Public opinion, information, mobilizable troops (the membership capacity), financial resources, skillful leadership and formal authority on policy-making are the main resources. Nevertheless, the success of an advocacy network in influencing the policy depends on the strength and density of its structure as well as its ability to achieve leverage. (Margaret E. Keck & Sikkink, 1999, p. 98). In that context, there are several key features which make the advocacy networks influential on decision makers. They are institutionalization, relying on strength of information, number of members, voluntary cooperation, horizontal management structure, flexibility to act and diverse strategies to influence the decision makers.

**Table 1.** Key features of advocacy networks

Institutionalization	<i>Low structure with limited budget</i>
Strength of Information	<i>Information use to increase influence</i>
Number of Members	<i>Public support and membership</i>
Voluntary Cooperation	<i>Collective action on voluntary basis</i>
Horizontal Management Structure	<i>No hierarchical organization</i>
Flexibility to Act	<i>Low procedures</i>
Diverse Strategies	<i>Lobbying, protests, petitions etc.</i>

**Source:** Author's own compilation based on ACF approach (Sabatier, 1998)

Advocacy networks are low institutionalized organizations with no budget or very limited budget for secretariat, the very limited data and no archival documents which are accessible through its website and no social media accounts. Additionally, they rely on the strength of information of the members. They use this information to increase their expertise and the number of members, the study area of the organizations as well as their influence on these areas. Lastly, they exist because of voluntary participation to act in a cooperation. So, the management of networks shows a horizontal structure without a decision-making and administration structure with rotation on the secretariat. Besides all, the advocacy networks, depending on their characteristics, use the conventional and unconventional strategies like lobbying, protests and petitions that make them more visible and influential on decision makers as well as the community. All these features give the ability to coalition to act flexible and quick reactions to political developments (P. A. Sabatier, 1998).

Advocacy networks use their members' specialization to influence policy making. The scientific and technical information that they can produce play an important role in the policy process. However, creating major policy change needs several factors like suitable socioeconomic conditions or governing coalitions (Weible, Sabatier, & McQueen, 2009, p. 123). It also needs time over a decade or more. During that period, the network has to be stable as

organizationally. The actor that the network focuses on is also an important factor. According to ACF, the network has “to focus on the substantive and geographic scope of institutions that structure interaction” (P. Sabatier & Weible, 2007, pp. 191-193).

It is important to expand the diverse strategies of the advocacy networks to understand their way of influence on the decision makers. According to the researchers, three main strategies could be defined for the advocacy networks (Handy, 2001, p. 653). First of all, the advocacy networks act like a watchdog to ensure who is responsible for preparing, monitoring and enforcing the environmental legislation. They define the actors and lobby these actors to change and modify the environmental policy. Secondly, the networks engage in litigation. They monitor the environmental issues closely, define the problem and go to law to aim to prevent harmful actions. Third and lastly, they conduct research with cooperation of the knowledge of members into the causes of environmental problems and their solutions. They prepare policy advice, technical reports, etc. to use for lobbying.

**Table 2.** The major strategies of advocacy networks

<b>Main Strategies</b>	<b>Aims</b>
Watchdog	Monitoring and enforcing the environmental legislation
Litigation	Defining and preventing the problem through law
Research	To gain knowledge based information

**Source:** Adopted from strategies of advocacy network by Handy, F. (Handy, 2001)

According to researchers, there are several stages that advocacy networks have to accomplish to create an influence on decision makers for a meaningful policy and behavioural change. Especially, if the first three stages could be completed, the change will be a matter of time.

**Table 3.** The stages of network influence

Stage 1. Issue creation and agenda setting
Stage 2. Influence on discursive positions of actors
Stage 3. Influence on institutional procedures
Stage 4. Influence on policy change in target actors
Stage 5. Influence on state behaviour.

**Source:** Adopted from the stages of influence by Keck & Sikkink  
(Keck & Sikkink, 1999)

When we examine these stages in the context of the Green 10 coalition and the EU, Green 10 follows all stages both as a coalition and individual member ENGOs. In Chapter 3, how the Green 10 put these stages in practice will be detailed.

### **1.5. DIFFERENCES BETWEEN ADVOCACY NETWORKS, INTEREST GROUPS AND EPISTEMIC COMMUNITIES**

It is important to define the similarities and differences between the closely related concepts like advocacy network, interest group, and epistemic community to understand the core actor of this study. We know that all these mentioned actors aim to make influence on decision-makers, but how are they different from each other?

In principle, all these actors are non-state actors. Non-state actors generally refer to “any organization that does not have a formal or legal status as a state or agent of a state”. They basically seek to influence the state actors. These actors could be both “NGOs like environmental groups, business and trade associations, research organizations and environmental-social development groups or the networks/coalitions of these NGOs and epistemic

(expert/scientific) communities” (Raustiala & Bridgeman, 2007, p. 3). Shortly, all these groups are defined as an ‘interest group’ or in some cases as ‘lobby group’.

Basically, an interest group is mostly a formal organization that rallies together for common interests and attempts to make influence on public policy. Any non-state actor could identify as an interest group as long as it has an interest to lobby. It is also not necessary to be a formal organization like influential political groups or professional elites which could be defined as interest groups (Cross, 2012, p. 140).

Authors categorize interest groups in different ways. Some authors categorize them according to their economic interests. The emitters’ groups like big industrial companies or sector-specific groups and renewable energy lobbies categorize as economic interest groups and the environmental lobbies, environmental NGOs, scientists, consultants categorize as non-economic interest groups (Michaelowa, 1998, p. 157). On the other hand, some authors classify the interest groups in two categories. The first is the sectional groups like farmers, chemical corporations, technological producers which mostly involve business economic groups with limited membership and specific interests. The second is the cause groups which represent belief based groups such as environmental protection without membership limitation (Stewart, 1958, p.25). Similarly Klüver defines interest groups according to the nature of interest in three types; companies, sectional groups and cause groups (Klüver, 2012a, p. 1123).

Most of these groups have consultative states and formal access to the policy documents, negotiations and deliberations (Raustiala & Bridgeman, 2007, p. 3). For example, in the EU policy process, the interest groups participate in the White Paper on European Governance or the Transparency Initiative (Klüver, 2012a, p. 1115). To create political influence, these groups carry out lobbying activities to decision makers in order to influence policy decisions for their own

interests. These influences could be a directional influence “to change the core of a legislative act or a technical influence to create a mind change in decision makers” (Michalowitz, 2007, p. 136).

Shortly, interest group literature generates the framework of the interest oriented groups. Nevertheless, the interest groups become specialized to advocacy networks, epistemic communities and other interest based structures. Here, this study aims to compare these closely related concepts. In the previous part, it detailed the advocacy networks. Now, it defines the features of epistemic communities.

The term epistemic community firstly used in 1968 by Holzner and introduced to IR discipline by Ernst Haas to understand groups of scientists (Cross, 2012, p. 141). As his son Peter Haas describes that “epistemic community is the communities/informal networks of experts, typically scientists who share both positive and normative belief about a given issue area or problem common notions of validity and a common policy enterprise” (Peter M. Haas, 1992, p. 2) Epistemic communities generally do not have any physical offices or formal hierarchies between its members, budgets or even membership lists. They represent informal coalitions of like-minded and influential individuals. This informal structure makes the epistemic community difficult to identify (Raustiala & Bridgeman, 2007, p. 4).

As a basic working systematic, epistemic communities provide advice to governments or governmental institutions like the climate scientists that take an active role in providing scientific knowledge to the public and policy-makers in terms of IPCC. This knowledge sharing generates the main source of power of the epistemic communities and ENGOs or advocacy networks/coalitions make this knowledge more broadly accessible (Raustiala & Bridgeman, 2007, pp. 24-28). In the EU scope, epistemic communities are “more influential at the early stages of policy-making during the agenda setting or policy proposal stage where the costs of change are still not clearly known” (Zito, 2001a, p. 600).



The members of the epistemic community could be diverse from scientists to political experts which have professional relationships that go beyond their formal roles (Cross, 2012, p. 154). However, some representatives of NGOs develop themselves in terms of knowledge and expertise in environment and climate change issues. In those cases, they have contributed their expert judgement, somewhat separately from their political judgement as an NGO. As an example for this, a climate expert in an ENGO could take action in an epistemic community to influence the policy process (Gough & Shackley, 2001, p. 331). Similarly an expert person who for a government could be part of an epistemic community and share her/his knowledge for an international organization. For example, the development experts from national governments could act like epistemic communities in the UNDP. In that case, an epistemic community located within the government but exercises as an independent agency. So, the epistemic community gains greater access to decision-making (Cross, 2012, p. 153). Eventually, the authors argue that the source where the epistemic community emerges does not make difference but what they say do (Drake & Nicolaidis, 1992, p. 39).

As in the advocacy networks, knowledge is an important factor for the influence capacity of epistemic communities. Scientific and expert knowledge play a significant role in addressing the problems of policy uncertainty that EU regulations often face in such issues as the environment. This is called as post-crisis conditions of uncertainty which makes the networks/communities more influential toward policy makers. Because politicians need to act in a crisis atmosphere and seek to gather information about their interests and options (P.M. Haas, 2001, p. 11581). This knowledge also acts like a 'glue' that helps to keep policy actors committed as well as as a trump card against opponents to the epistemic coalition (Gough & Shackley, 2001, p. 332). As a result, these networks/communities provide a critical input to maintain the effectiveness of the regulations and joint decision mode of EU policy-making (Zito, 2001b, p. 474).

On the other hand, some authors claim that limiting the epistemic communities and advocacy networks with scientific/technical knowledge could be a mistake. For example, the groups of religious leaders may act like an epistemic community (Ahu Sandal, 2011, p. 930). However, the knowledge that is presented by this kind of epistemic community can be completely imaginary, because there is no way to actually test the knowledge (Adler, 1992, p. 107). So, it is possible to say that the literature of epistemic communities is based on scientists and scientific knowledge (Cross, 2012, p. 159).

In the lights of these, there are certain similarities and differences between advocacy networks, epistemic communities, interest groups and other closely related concepts. First of all, they are similar because they operate around shared belief systems and knowledge. Secondly, they are part of a wider “esoteric knowledge community” in the EU policy subsystem, so their scientific/technical knowledge have a potential influence on the EU policy making and act as advisory/consultative actors (Zito, 2001b, pp. 468-469). On the other hand, they show significant differences like the participants of each group. While both the advocacy networks and epistemic communities mostly involve experts and scientists, the advocacy networks commonly consist of formal organizational structures like NGOs. Interest groups, at the same time, involve lobbyists, journalists or politicians who usually have political objectives. The target groups of each group are also different from each other. Advocacy networks are mostly concerned with society, public opinion and media, while the epistemic communities are motivated more by technocratic considerations. In that context, the Green 10 coalition shows similar features with epistemic communities and interest groups in terms of knowledge sharing or the shared belief but basically differentiates as organizational structure, members and methods to engage policy processes.

## 1.6. MULTI-LEVEL GOVERNANCE OF THE EU

There are two sides of influence; the one who tries to influence and the one who is exposed to this influence efforts. It is important to get to know the influencer, in case of this study, ENGOs and advocacy networks but it is also crucial to know the other side, the EU in that case. While the EU has a multilateral decision-making process, it has become more important to examine its dynamics on policy-making.

The EU defines multi-level governance and its implementation principles in two articles of the Charter for Multi-level governance in Europe. As the fundamental principles, “it is a coordinated action by the EU, the Member States and regional and local authorities according to the principles of subsidiarity, proportionality and partnership, taking the form of operational and institutional cooperation in the drawing up and implementation of the EU’s policies”. From the implementation perspective, it aims to promote active citizenship, foster a European mind-set, strengthen institutional capacity and create networks from local to the European level for transnational cooperation. In the light of principles like interdependence, transparency and efficiency, it aims to connect regions and cities and promotes multi-actorship by running joint projects and cooperating with societal actors such as the social partners, universities, NGOs and representative civil society groups (European Committee of the Regions, 2014).

The European Union is a state dominated structure with membership of 27 countries across Europe (European Union, n.d.). To deal with the problems of this large territory and members, the multi-level governance system has been practiced in the EU. Different actors serve on different stages with support of various expertises (Hooghe, 2002, pp. 12-14). For example, in terms of environmental policy, the EU establishes structures such as the Water Framework Directive to achieve spatial scale of governance. On the other hand, it increases the participation of non-state actors for incorporating stakeholders

by using their knowledge to increase acceptance and implementation. As a result, it ensures collaborative and participatory governance and achieves a sustainable and effective environmental policy (Newig & Fritsch, 2009, p. 198).

Together with the effective implementation of multi-level governance, the legitimacy of the EU enhances. While the output legitimacy increases as parallel to effectiveness and responsiveness of the policy, the participation and representation of non-state actors supports the input legitimacy of the EU. On the other hand, being dominated by the states means that the decisions are shaped by these dominant powers. However, there is a debate about what is the real dominant power in the EU multi-level governance system. There are two major forces that shape the EU. Intergovernmentalism argues that member states and intergovernmental institutions of the EU are the dominant powers in the EU decision-making process for legislation. Conversely, neo-functionalism suggests that powerful economic and social forces of the market (which could be business groups or either non-governmental organizations) and supranational institutions of the EU are dominated powers and shape policy-making (Piattoni, 2009, pp. 164-165).

In that point, it is important to define intergovernmentalism and neofunctionalism in comparison with the multi-level governance approach. Intergovernmentalism essentially means the bargaining among national governments over the outcome of treaty negotiations (Garrett & Tsebelis, 1996, pp. 270-271). According to the intergovernmentalist approach, the national governments are less willing to transfer their authority to supranational bodies in the EU (Moga, 2009, pp. 800-801). The member states have always guarded their national interests and avoided granting supreme authority which causes transfer of sovereignty. To prevent this transfer, they put strict limits to any future possibilities and worked through intergovernmental institutions such as the Council of Ministers or European Council (Moravcsik, 1991, p. 27). Because of this in the EU governance system, governments of large EU member states had

more influence over the outcomes than other states because of the voting weight before the Treaty of Nice in 2003 (European Parliament, n.d.-a).

While the intergovernmentalist perspective analyses the policy process like this, neofunctionalism draws another perspective that takes us more closer to the multi-level governance approach. Neofunctionalism was first mentioned in Ernst Haas's book 'The Uniting of Europe'. It is mostly associated with Jean Monnet's functional federalism in terms of its miscellaneous synthesis of elements of functionalism and federalism (E. Haas, 2004).

Neofunctionalism focuses on regional integration to deal with how supranational institutions fit and work together. Ernst Haas argues that this political integration is a process that causes a shift of actor's loyalties, expectations and political activities to a new center (E. Haas, 2004, p.16). There are two key components of the neofunctionalist approach to explain this integration. The first one is the sectoral or functional spillover that defines the expansion of integrative activities from one sector to another (Lindberg & Scheingold, 1970). The second is the political spillover that increases the politicization of sectoral activity (Rhodes & Mazey, 1995, p.31). For example the centralization of EU monetary policies and transferred authority to the European Central Bank are good examples (European Central Bank, n.d.)

However, there are critiques from an intergovernmentalist perspective to the neofunctionalist approach. Some authors argue that the European Council is still shaped by the national governments and this limits the spillover effect of the neofunctionalist theory. Others claim that the Single European Act in 1987 was a turning point for the development of the EU and intergovernmentalism increased its role and influence over neofunctionalism (Moga, 2009, pp. 800-801). While the important agreements or key issues shaped by intergovernmentalist approach, more bureaucratic and administrative decisions maintained from a neofunctionalist perspective (Marks, Hooghe, & Blank, 1996, p. 352).

Shortly, intergovernmentalism is a more state dominated approach that policy outcomes reshape according to national interests of member states. The institutions are less effective and there is a difficulty to reach consensus at the EU level. It is successfully applied because of the several compromises between supranational institutions and members states. On the other hand, neofunctionalism is mostly independent institutions oriented. Snvdholtz defines the impact of neofunctionalism as “Once states created an international organization with independent power, they brought to life a creature that is because it possesses autonomy, not entirely under their control” (Snvdholtz, 1996, p. 408). Neofunctionalism successfully applied in the EU because the member states do not have supremacy anymore on these independent authorities. The member states also accept their independence for their long-term interests.

In consideration of intergovernmentalism and neofunctionalism, multi-level governance (MLG) originates from the neofunctionalist theory (E. Haas, 2004). However, Europeanization merges both approaches and creates the MLG dominated policy system. Today MLG is widely adopted by the EU (Bache, Bartle, & Flinders, 2016, p. 486). As a basic concept, multi-level governance implies negotiated and non-hierarchical exchanges between institutions at international, national, regional and local level (Peters & Pierre, 2001, p. 131-132). In other words, “it is a system of continuous negotiation among governments at several territorial tiers, from supranational to local” (Hooghe & Marks, 2003, p. 234). It represents a system of horizontal interactions of different level actors like governments to non-governmental actors. (Bache, Bartle, & Flinders, 2016, p. 487). Some authors claim that MLG is an alternative system to hierarchical government (R.A.W. Rhodes, 2000). But others argue that MLG should not be seen “as alternative but rather as a complement to intergovernmental relations and supplement of intergovernmentalism and neofunctionalism” (Peters & Pierre, 2001; Bache, Bartle, & Flinders, 2016).

There are several factors that prepare an environment for the emergence of MLG. Firstly, the source of power shifts toward the local. Authors argue that the

power of legitimacy is not related with constitutions anymore but the ability to coordinate the sources of public and private actors (Peters & Pierre, 2001, p. 131). When we consider the decentralisation in the 1980s and 90s, the local and regional governments have become more important to coordinate these actors. Secondly, the question of “how collective decisions can and should be made instead of whom they can and should be made” helps to interrogate the governance system. It is very difficult and maybe impossible to answer the question of how, because there is no legitimate alternative to the liberal democracy. However, it is possible to answer the “who” question with central states, national, regional and local authorities (Liesbet Hooghe & Marks, 2003, p. 241).

Authors argue that national governments losing their control over the society, but the supranational and non-state actors become more important. In this shift, the networks of corporations, NGOs, professional societies and advocacy groups take roles (Rosenau, 1997). So, the central governments continue to lead the decision making but in cooperation with societal interests and subnational governments instead (Jeffery, 1997).

The change in the nature of issues is an important factor for the shift in policy making process. For example while climate change has a global impact, the side issues like biodiversity conservation, habitat protection or urban planning need action on a local or regional level (Liesbet Hooghe & Marks, 2003, p. 235). A similar pathway is in use for the single market programme of the EU. The subnational authorities became important players in policy making and they took their first formal role in EU policy making in 1989. They became eligible to use EU regional funds (Bache, Bartle, & Flinders, 2016, p. 486).

The shift from the national level to the regional or local level creates a political sphere for the NGOs to interact with the policy making process. Especially, environmental NGOs use this political sphere actively to engage in environmental decision making. Because of the MLG, the ENGOs and

advocacy networks like Green 10 politically identify as an policy actor. They become members of the expert groups and meet regularly with the representatives of the EU, because they gain the legitimacy which the MLG approach narrates them as an actor. So, they can more easily act in the EU's political sphere and attempt to create influence over the decision makers. Shortly, it is possible to say that ENGOs and advocacy networks could exist even if there is no MLG in the EU. Nevertheless, the MLG approach creates a civil area and suitable political conditions that ENGOs could easily emerge, interact with each other, public as well as policy makers.

As a result, today's multi-level governance approach dominates the EU's governance system. It basically gives the ability to decision makers to adjust the scale of governance to reflect heterogeneity of different levels (Liesbet Hooghe & Marks, 2003, p. 236). Additionally, it shifts toward understanding the nature of the EU as a political system.

### **1.7. THE METHODS OF ADVOCACY NETWORKS TO ENGAGE MULTI-LEVEL GOVERNANCE**

The relation between the advocacy networks and the EU is complex as much as the multi-level governance itself. In the case of Green 10, for example, the member ENGOs of the coalition and EU are in a cooperation and also in conflict. Sometimes, these ENGOs are the organizations which share their expertise and policy advice, and sometimes they are more in the activist role. However, the Green 10 coalition combines both approaches and presents a balanced structure view.

In that context, the Green 10 uses multiple lobbying strategies to create influence on decision-makers and change on policies. If there are complex issues which address the governmental actors, the network lobby to EU institutions like the Commission, Parliament and Court. This is called inside



lobbying. But if the issue is more salient, the network turns its face to the public to create more impact to influence the decision-makers, called outside lobbying. By this way, ENGOs increase their reputation as well as their influence capacity (Junk, 2015, p. 239).

There are three main actors that the advocacy networks are lobbying to; first the governments or the governmental institutions to impact on legislation; second the business sector to adopt safer and cleaner ways of production and third the general public to adopt environmentally ethical behaviour (Handy, 2001, p. 653). Of course, to be effective on these actors, they use several methods that are listed below.

1. Advocacy networks use the information which is politically usable to create impact on decision-makers or the public. Because of structural capacity (number of members, local networks, experts etc.), advocacy networks serve facts and testimonies which are alternative sources of information. This information draws the attention of the media and press.
2. Advocacy networks use symbolic power to increase their influence. This symbolic power could be symbols, actions, stories etc. which makes sense to the audience. For example, in the case of Green 10, the membership of globally well-known ENGOs like WWF and Greenpeace helps the coalition to increase its symbolic power.
3. Advocacy networks use its capacity to create leverage on the decision-making process. These capacities could be either material or moral. As material leverage, the economic strength to arouse the public or goods like prestigious offices and qualified staff make the network more influential. As moral leverage, the network could be able to mobilise shame and put bright light to target actors.
4. Advocacy networks monitor the powerful actors closely and chase their accountability and transparency. Then they use this information to reveal the problems and shame the actors (Margaret E. Keck & Sikkink, 1999, p. 95).

## **CHAPTER 2**

### **THE HISTORICAL AND SOCIAL CONTEXT**

First of all, this chapter summarizes the rise of environmental policy in the EU from the early stages of the European Economic Community to European Union. When it does that, it follows the international developments on environmental negotiations. Later, it details the emergence of ENGOs on a global scale and analyses the reasons why European continent became the focus of these ENGOs. Lastly, it discusses the interaction between the mentioned ENGOs and EU environmental policy by analyzing the objectives and instruments of ENGOs. In short, this chapter evaluates the rise of the EU in the international system from the environmental policy perspective and explains the role of ENGOs and particularly Green 10 in the policy-making process in the EU in the historical context.

#### **2.1. THE EMERGENCE OF THE EU ENVIRONMENTAL POLICY**

Even if the EU, today, has a large scale of legislation on social, economic, political, cultural and scientific issues, it had a more narrow perspective in the early stages of its foundation. We know that economic growth and political security were the main priorities of this cooperation in the chaotic atmosphere after WWII. Especially, in terms of environmental policy, there is no reference in the legislation.

It is possible to examine the development of environmental policy in the EU in three-periods. The first period starts with the Treaty of Rome in 1957 and ends with the rise of global environmental movements in the early days of the 1970s. The second period starts with the first international environmental meetings in the beginning of the 1970s and continued until the ratification of the Single European Act in 1987. The third and last period that continued till the

Amsterdam Treaty and ended with the creation of Green 10 in 1999 (Appendix.4).

The first period starts with the Treaty of Rome in 1957. It is the foundation treaty of the European Economic Community (EEC) with signatures of six founder states which are France, West Germany, Italy, Belgium, Netherlands and Luxembourg. With the creation of the EEC, a new political actor joined the international system in the chaotic economic and political atmosphere of WWII and early days of the Cold War. The Community aims to create a common market for free movement of goods, people, services and capital among member states. In contrast to the current comprehensive legislation of the EU, the EEC had a narrow legislation and environmental issues were not part of it. Some authors argue that the Community did not have any reference on environmental policy in its legislation until the 1986 Single European Act. However, limited internal developments parallel to international environmental movements confutes these arguments. Even if these developments aim to protect economic interests, they are still significant in the absence of limited international environmental legislation. Some of these developments in the framework of the Treaty of Rome are;

- Prevention of excessive subsidization of regeneration of used oil (Eckard & Richard, 1985, p. 16),
- Establishing a uniform system of classification, labelling and packaging of dangerous substances to deal with environmental matters,
- Regulating permissible sound level and exhaust systems of motor vehicles,
- Limiting vehicle emissions,
- Respect to countryside protection in agriculturally less favoured areas. (Hildebrand, 2005, p. 23)

In terms of institutional developments, in 1971 directorate-general formed the Environment and Consumer Protection Unit and that same year an

environmental council was established with the participation of related ministries of member states (European Commission, n.d.-b).

The second period starts with the international environmental movements in the 1970s. The UN Stockholm Conference on the Human Environment in 1972 is a benchmark because it was the very first example of environmental negotiations among member states. The conference resulted in the establishment of the UN Environmental Programme (UNEP) (United Nations, 1972). In the US, while governmental organizations like the Environmental Protection Agency were founded, the number of civil society organizations has increased with the creation of the Friends of the Earth, WWF-USA and Greenpeace. Similar developments can be observed in Europe. Environmentalists such as Jacques Cousteau in France, Bernhard Grizmek in Germany were important figures who first used the mass media effectively to prompt the public to environmental problems.

Following international developments, the Community started the first institutional steps for environmental policy in the last months of the same year. The European Council met in Paris and the 'Programme of Environmental Action of the European Communities' was approved as the first environmental initiative of the Community in 1973. It is also a benchmark for the Community in terms of realistic environmental objectives and priorities. The main objective of the programme was "to improve the setting and quality of life, and the surroundings and living conditions of the Community population and 11 principles were determined". In general, these principles create a comprehensive legislation on the Community level as well as underlines the importance of local actions in order to solve environmental problems. Preventive action, eliminating pollution at the source and each different type of pollution needing action at different levels were the highlighted aims of the programme.

In this period, it is important to mention the oil crisis and intensifying nuclear arms race. These international developments caused a short pause in the environmental policy of the Community. However, with the increasing pollution in the rivers of the European continent, the large forest fires in Germany and the high level of air pollution in the metropolitan cities, the environmental policy in Europe developed more strongly than previous period.

The Second Action Programme started to be implemented in 1976 with more developed features of the previous one. It specially underlined the space race between the superpowers by non-damaging use and rational management of space, the environment and natural resources (European Commission, 1976). As the last of the second era, the Third Community Action Programme developed in 1982 and stayed in effect until the 1986 Single European Act (Council of European Communities, 1983). With the difference of premises, the third programme defined the possible problems in the common market because of differences between member states' national legislation and economic capacity. It also strongly emphasized the possible conflicts emerged due to the overriding of the common market for economic interests. So, the third programme developed an environmental impact assessment procedure to determine the priorities on a large scale from waste management to dangerous chemical substances and from fresh-water and marine pollution to atmospheric pollution. Additionally, it defined the importance of cooperation with developing countries in European continent. This era is also important for the development of legislative measures in number as well as in extent like the regulations on habitat and species protection, non-use of environmentally sensitive areas for agricultural use and directives on protection of birds, whales, and seals. (Weale, 1996, p. 598)

The third and last period started with the 1986 Single European Act (SEA) and shaped in a complex legislative structure. Not just because of the changes in the dynamics of the Community, the international environmental negotiations like 1992 Rio Earth Summit were important factors that affect this era. The

Fourth Action Programme accepted a similar general concept of the previous one, the new regulations on integration of environmental policy to education and technology policy as well as social, economic, industrial and agricultural legislation (Council of European Communities, 1987). According to some authors, the Environmental Action Programmes were led up to the Single European Act. So the SEA created new and advanced reforms on environmental policy like new institutional structures, the application strategy of environmental policy in the internal market and integration with international environmental politics (Weale, 1996, p. 600).

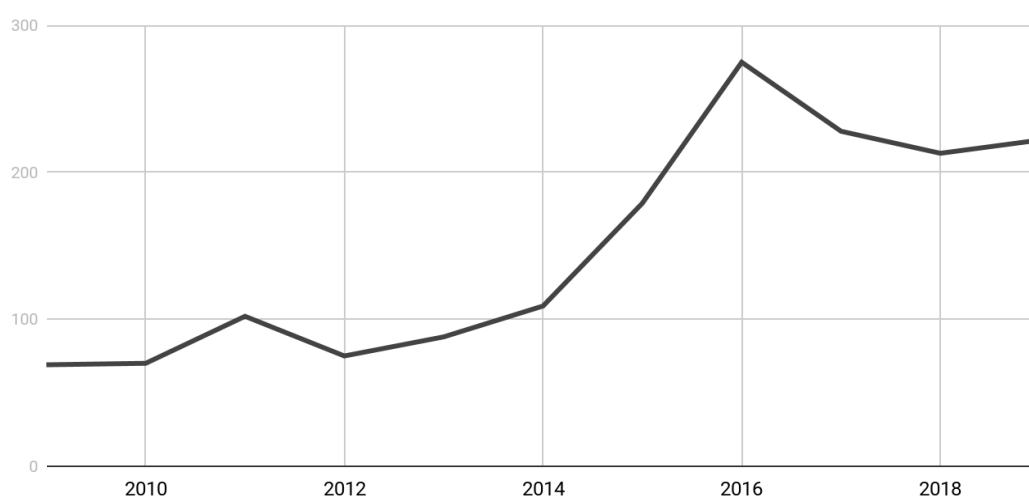
To understand the development of environmental policy in the European Community, it is important to understand the effect of the rising environmental problems and movements in the continent and globally. However, the single market and integration objectives are still priorities in Europe. So, what is the correlation between them?

Environmental policy needs local applications and national actions. In that case, the Community concerns the environmental policy as a tool to support the integration. There are three reasons to explain this. First, the environmental problems have cross-boundary effects. In a continent like Europe, the states are in high interaction, it means problems have the capacity to be effective on a large scale. To solve this problem, members need to act in harmony. Second, the environmental problems have a spill-over effect. When the production rises, pollution rises. So, there are principles in the Action Programmes to regulate industrial production and environmental degradation. Third and lastly, the environment is a salient issue when we consider the reality of the Community's economic cooperation feature. The private sector wants to keep its economic growth, even if it results in new environmental problems. The conflict between the two sectors is inevitable but the environmental movements are on stage to balance the system (Weale, 1996, p. 595).

## 2.2. THE RISE OF ENVIRONMENTAL NGOS IN EUROPE

Like the development of environmental policy in the EU, there is a development of NGOs on a global scale, especially environmental NGOs. In this sense, The UN Stockholm Conference on the Human Environment in 1972 is a milestone for NGOs with participation of more than 250 of them. These NGOs were involved in the conference by sharing their expertise and technical capacity, but also they were working on the rules and principles of the participation of NGOs in environmental negotiations. As a result, the NGOs were acknowledged as partners which can contribute significantly to the negotiations (Becker, 2016, p. 1). Today, more than 5000 NGOs have consultative status in the Economic and Social Council (ECOSOC) of the UN (United Nations Civil Society Participation, n.d.). Greenpeace and WWF, which are the members of Green 10, have consultative status in the General category which is the highest consultation status. Similarly, all member organizations of Green 10 are observers in the UNFCCC (UNFCCC, n.d.).

**Figure 4.** The number of ENGOs registered in the Transparency Register between 2008 and 2019



**Source:** Author's compilation based on data from EC Transparency Register Tool

In the 1990s, an increase in both the number and scope of ENGOs had been observed. In contrast to previous decades, these newly emerged ENGOs were not just interested in general environmental issues but became issue specific organizations. These specialised ENGOs focused on different issues from nuclear disarmament to fossil fuels and from climate change to loss of biodiversity. However, because of their small and modest resources, most of these ENGOs stayed as local or regional organizations, while the older ENGOs like Greenpeace and Friends of the Earth continued their global operations (Berny & Rootes, 2018, p. 952). North America and Europe have become the centre for these local/regional focused organizations.

While the ENGOs had a development in the global scale, the European continent and especially the EU as a political actor had a significant meaning for these ENGOs. Without doubt, the EU emerged in global politics as a rising actor and have spreaded its influence over the years. On the one hand, the EU developed in terms of economic welfare because of the cooperation between members and followed by the enlargement and integration. On the other hand, it created a social order based on democracy, active citizenship and human rights. As a result, it gained an important and effective role in world politics. When there is an important political actor like the EU, it is inevitable for emerging new actors to influence the decisions of this policy-maker. In this sense, EU institutions became the main objective of lobby groups from different areas. Brussels, which is the administrative centre of the EU, has become the centre of the lobbying (Biliouri, 1999, p. 173).

The rise of interest groups (civil platforms, business groups etc.) and ENGOs in EU environmental politics could be explained with the bandwagon effect. Accordingly, the sphere of influence of the EU expands when its political role gains strength. So, more interest groups aim to involve in the decision-making process of these actors. Eventually, Brussels becomes the focus point of these interest groups (Broscheid & Coen, 2007). One of the best examples for this is



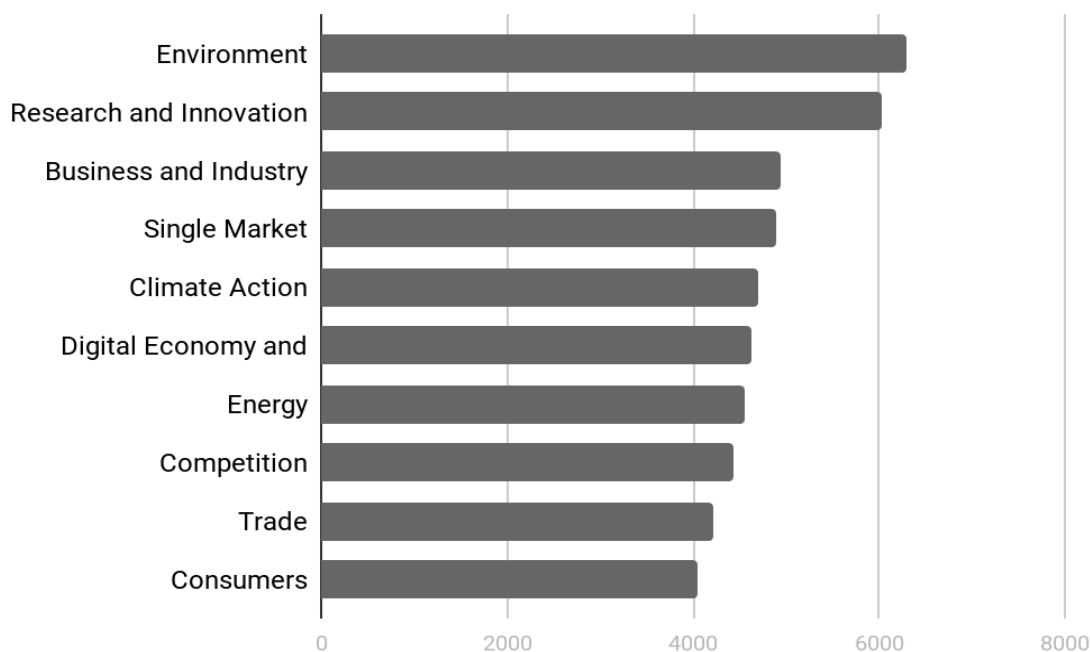
the European offices of each member of Green 10 located in Brussels (except the Naturefriends International) (Biliouri, 1999, pp. 175-176).

In that context, the Green 10 is an important and unique environmental coalition with its number of members and scope, not just in Europe but all over the world. Currently, the Green 10 coalition covers more than 630 regional/local organizations from all around Europe and neighbouring countries. A significant part of these organizations is acting globally as well. So, the existence of the Green 10 is meaningful when we consider the development of environmental policy and ENGOS in Europe and the cooperation between these actors. The detailed discussion will be given in Chapter 3 about Green 10 members.

### **2.3. HOW DO THE ENGOS INVOLVE IN THE POLICY-MAKING PROCESS OF THE EU?**

There is an on-going interaction between the EU institutions and the interest groups which want to exert a political influence on the policies. According to the records, there are more than 15000 people who are working for the Commission and European Parliament. These personnels are part of different layers of the policy-making process. On the other hand, there are more than 20000 lobbyists everyday who are lobbying into these institutions and the personnels (Coen, 2007, p. 334). There are 11,930 organisations registered to the Commission and the Parliament and more than 82 thousand people are lobbying in the EU. 26,2% of organizations are NGOs and 46% of them are companies, trade and business groups. The significant part of the NGOs is working on environment and research and technology (European Commission, n.d.-c).

**Figure 5.** The number of organisations working on top 10 topics as 2019



**Source:** Author's own compilation based on data from Transparency Register

The legislation in the EU is a multilayered process. The Commission is of great importance in this process. It is responsible for preparation and implementation of the proposals after the approval (Weale, 1996, p. 602). There are 28 Commissioners called 'the college' is the decision-making structure of the Commission and 53 departments/executive agencies (known as Directorates-General (DGs)). DGs prepare, implement and manage EU policy, law and funding programmes (European Commission, 2016a). During this process, DGs typically consult expert groups, advisory committees and stakeholders in the drafting process via the "Consultations" system (European Commission, n.d.-a).

The policy making process in the EU works roughly in that order; European Commission submits the legislative proposal to the European Parliament after the consultation process. The first reading was held by the European Parliament. EP examines the proposal and may adopt or amend it. After the EP, the proposal was sent to the Council. It may decide to accept EP's position and the legislative act is adopted, or it may amend the proposal and return to the EP

for a second reading. EP examines the Council's position on proposal and approves it, so the act is approved or rejected. In that case, the whole procedure ends; or amendments are proposed and the proposal returns to the Council for a second reading. If the Council approves, the proposal is adopted; or if it is declined and proposal is not adopted. The vast majority of proposals are adopted at this stage (European Parliament, n.d.-b).

To be involved in this process, institutionalization of the environmental movements is critical to gain formal and informal inclusion by the EU institutions. There are several ways to complete this process; the organization could strengthen its organizational capacity and institutionalization level by itself, or act as in a coalition with other organizations to develop its capacity. In terms of the many European ENGOs, the coalition is a favoured method to develop the capacity, access and influence of the organization in the environmental policy-making process. After that, ENGOs need to specify their institutional access points which are the key actors for the influence (Doh & Guay, 2006, p. 53). In terms of the Green 10 and many other ENGOs, there are three institutional access points which are the Commission, European Parliament and European Council (Green 8, 2001).

The question is why are the ENGOs addressing these EU institutions? What is their interest by accessing these institutions instead of the governments of the member states? There is a power shift from EU member states to the EU institutions in terms of environmental policy. However, the EU institutions need expertise to deal with this large amount of environmental issues and policies. It is practically hard to work with all related experts internally in the EU institutions, so the ENGOs are the most suitable expertise. Here a symbiotic relationship emerges. To fill that gap, not just the ENGOs but most policy-oriented NGOs, holds qualified and well-trained personnel who are working on policy issues. When we examine the members of Green 10, each of them has a team with high competences on policy-making procedures and the law-making in the EU.

Thus, when the EU institutions find their suitable expertise on environmental issues, ENGOs find a chance to influence the policy proposals.

According to the Klüver, the structural features of the organization are important factors for their lobbying/influence on the policy-makers (Klüver, 2012b, p. 491). For example, the economic and team capacity as material sources are important to supply expertise to the Commission. So, the ENGOs become more capable to be aware of new policy initiatives to react quickly by participating consultations, attending formal hearings, one-to-one meetings to establish informal contacts with decision makers and taking part in working groups.

On the other hand, the strong organisational structure in terms of organisational culture and institutionalization strengthens the organisation for coordinating the formal mechanisms. The organization becomes more reactive to the newly developed policies and supplies more information to the Commission because of internal functional differentiation. Additionally, these organizations act more decentralized in terms of EU affairs. Each of Green 10 members (except the Naturefriends International) have offices in Brussels. By doing that, they give quick responses to the developments and use their initiative/autonomous decisions apart from the headquarters (Klüver, 2012b, p. 498). Shortly, more material sources and strong organizational capacity mean more information/expertise being supplied to the policy-makers; and more information means more influence on these processes.

In other respects, the EU carries out several processes to support and increase the capacity of these organizations. The Commission creates forums and committees to reduce lobbying activity on the EU institutions and develop the inclusion of ENGOs to the policy making process (Coen, 2007, p. 336). Additionally, through the funding allocation and capacity improvement meetings, it aims to support the organizations economically and develop the organizational capacity (Ciplet, 2014, p. 80).

As a conclusion, ENGOs and EU institutions are in an active interaction when we consider the process from historical and social context. This interaction is only possible because of mutual existence. While the ENGOs aim to be part of the policy-making process and influence the decision through their expertise, the EU institutions target to create a democratic atmosphere by promoting participation of civil society via openness and transparency. Shortly, the state and civil society, or the EU institutions and ENGOs in terms of this research, do only exist as long as they actively interact to create a successful and effective environmental policy.

## **CHAPTER 3**

### **POLICIES AND PRINCIPLES OF GREEN 10**

This chapter aims to define the policies and principles of Green 10 as an advocacy network. It explains the foundation, objectives, members, and study areas of the network comprehensively. In the previous chapters, the research briefly analysed the emergence of the environmental policies in the EU and how the environmental NGOs became part of the policy-making process. However, ENGOS represent a larger community and need to specify the actors. As mentioned earlier, this study is built on the base of the Green 10 coalition. Here, it is important to mention that, there are several local and regional environmental coalitions in the EU. However, Green 10 differentiates by covering these coalitions as well as according to its scope, organizational structure, the features of members, etc.

In this chapter, the Green 10 is examined from the emergence to the current status. There are three parts in this chapter. First of all, the chapter analysed the rise of coalition from 8 to 10 members and the reasons of the members to act collectively in comparison with the interest groups literature. Secondly, the members of Green 10 shortly explained according to their objectives, study areas, number of members, organizational structure, the funding relationship with the EU institutions, etc. Lastly, the characteristics of the Green 10 as an advocacy networks detailed from the theoretical perspective.

#### **3.1. THE EMERGENCE OF GREEN 10**

The approach of the EU to the environmental policies and the rapid increase of ENGOS in the last 30 years, resulted with the desire of these organizations to be an active part of policy-making process of environmental legislation. The ENGOS work to be involved in the process by different strategies like lobbying, bargaining and advocacy. They aim to increase their influence and create an

impact on the final policies which are suitable to their organizational views. In this term, it is inevitable for the emergence of coalitions like Green 10 in this process.

According to interest group literature, the different parties who are working on similar issues, create coalitions to increase their bargaining power as well as legitimacy toward decision-makers. By doing that, the coalitions increase their access and influence (Scott & Lane, 2000, p. 47). Similar scenario is applicable for the ENGOs to influence the governments and governmental institutions.

In that context, the Green 10 emerged to fill that gap in the EU environmental policy. It is a coalition consisting of the ten leading environmental NGOs which are active at EU level. Each of the members (excluding Greenpeace) are the federations/networks of national/regional level NGOs. The coalition starts from 1999 as the Group of 8 (or Green 8) with the participation of BirdLife Europe and Central Asia, Climate Action Network (CAN) Europe, European Environmental Bureau (EEB), Friends of the Earth Europe, The World Conservation Union (IUCN), Greenpeace European Unit, T&E (Transport and Environment) and WWF European Policy Office (Biliouri, 1999, p. 175). In the last 20 years, the coalition firstly has evolved to Green 9 with participation of EPHA Environment Network (EEN) and Nature Friends when IUCN left in 2005 and finally to Green 10 with the participation of Bankwatch Network and Health and Environment Alliance (HEAL) (on behalf of the EEN) in following year (Green 9, 2005a).

The Green 10 members have a diverse fields of interests which are mainly budget, climate action, energy, environment, institutional affairs, international cooperation and development, public health, regional policy, transport and trans-European networks as well as agriculture and rural development (European Commission, n.d.-m). It campaigns for strength the implementation of EU environmental policies in the member states, while sustaining the policies are environmentally effective. Additionally, it promotes the leadership of the EU

in international environmental negotiations. The main objective of the coalition is to achieve more power for influence and to be considered as a legitimate environmentalist actor on EU environmental policy. The members of the coalition work together to lobby and influence EU institutions which are the European Commission, the European Parliament and the Council of Ministers, to approve and adopt new environmental regulations which are suitable to the members' individual objectives. Additionally, the coalition monitors the fulfilment of these regulations on current legislation and works to increase the commitment to preserving and enhancing the natural environment among all who inhabit the EU (Green 9, 2005a).

In addition to the main objectives as lobbying, implementation and monitoring, Green 10 strongly emphasises its aim on local communities. The coalition mentions its mission to be the voice of environmentalists from the local-based associations, which would otherwise have no access to EU decision-makers. It believes that, by informing the local and feeding from the local, strengthen the coalition's hand to influence EU environmental policy as well as monitor its implementation. Besides, the coalition contributes "to the strengthening of civil society across Europe, through training in advocacy skills, policy analysis and the EU decision-making process" (Green 9, 2005a).

The financial transparency is a praised issue for the Green 10. The coalition financially exists mostly because of the membership contributions. As the coalition itself, it does not receive any funds from the EU institutions or other governmental organizations. However, the member organizations receive core funding from the European Commission. Moreover, some members receive funding on a case-by-case basis for specific projects from governments and foundations or specific donations from industry. It is important to mention there Greenpeace does not request or accept any financial support from governments, the EU or industry (European Commission, n.d.-d). For most of the members, EU funds are not the majority of their budget, but it still covers significant percentages (see Table.4). However, when we examine the



correlation between the EU fund percentage and the position of the ENGO, we realize an important outcome. Members like CEE Bankwatch Network which EU funds covers a significant percentage of their budget, has close relations with the EU institutions and has a more nonpolitical position. On the other hand, members like Greenpeace and WWF which do not take any EU fund or limited amount are more independent and have positions on more activist and leftist. In Chapter 4, we will examine the practical reflections of this fund-position dilemma through the position papers, policy advice and final policies.

**Table 4.** The members of Green 10 according to focus areas, budget and percentage of the EU funds as of 2018-2019

<i>Name of the member</i>	<i>Focus Areas</i>	<i>Yearly Budget (2017-2018)</i>	<i>Percentage of EU funds on budget</i>
<b>CEE Bankwatch Network</b>	European Financial Institutions	1,734,961 €	52%
<b>BirdLife Europe and Central Asia</b>	Birds & Habitats	2,100,369 €	17%
<b>Climate Action Network (CAN) Europe</b>	Climate and Energy	2,271,174 €	13%
<b>EEB European Environmental Bureau</b>	Most of environmental issues	3,835,196 €	37%
<b>Friends of the Earth Europe</b>	Sustainable Development & Circular Economy	3,468,152 €	43%
<b>Greenpeace Europe Unit</b>	Most of environmental issues	1,779,966 €	0%
<b>Health and Environment Alliance (HEAL)</b>	Air Quality and Chemicals	1,021,089 €	37%
<b>Naturefriends International</b>	Tourism	359,630 €	5%
<b>Transport &amp; Environment</b>	Transportation	4,032,379 €	13%
<b>WWF European Policy Office</b>	Most of environmental issues	4,805,676 €	17%

**Source:** Author's own compilation based on data from Transparency Register

Each of the member ENGOs is internationally well-known, and has a large number of supporters as well as networking from local to regional level. Today, the Green 10 coalition represents more than 20 million supporters all around Europe (Green 10, n.d.-a). Because of this number of supporters, Green 10 leads environmental change by pressuring corporations to modify their environmental practices. While doing that, it seeks to represent the views of their supporters as well as the European citizens in the political decision-making process (Ceballos, de Lange, Haro, & Salazar, 2012, p. 258). The coalition believes that the network of the members is the most important strength of Green 10. The member ENGOs regularly inform their supporters about their activities and developments on the environmental policies at the EU level (Green 9, 2005a).

Nevertheless, it is important to understand the reasons why the members of Green 10 needed to create a coalition. Each of ENGOs in Green 10 are both structurally and financially strong organizations. These ENGOs individually have the capacity to use diverse strategies and political tactics to influence decision-making processes (Schepers, 2006, p. 284). However, the EU environmental policy is a multilateral process and involves actors including the firms, governmental institutions as well as civil society. So, for the Green 10 members, it is a necessity to work together to enhance their environmental leadership. By being part of this coalition, they become a legitimate actor and establish a direct relationship with the EU institutions. The coalition increased their power and legitimacy that empowered it to lobby, persuade and cooperate in a most effective way with the EU institutions (Ceballos, de Lange, Haro, & Salazar, 2012, p. 259).

As mentioned in the theoretical chapter, the Green 10 as an advocacy network follows several steps to create influence on the decision makers. First of all, the network works on the issue creation and agenda setting period. During that period, it aims to include the environmental issues to agenda by influencing the administrative actors. So, the concerned environmental issue could be part of

discussions of decision makers. Secondly, the network efforts to influence discursive positions of actors. By doing that, the decision makers could discuss the related issue in the way of the network's interest. Thirdly, the network seeks to change institutional procedures. These procedures could be either the concerned issue related procedures or the ones that help to amend the environmental procedures. If the network could be effective in the first three stages, policy change will be a matter of subject. Because in the fourth and fifth stages, the network aims to influence the targeted actors to create major policy changes and change the state behaviour through its advocacy actions (Margaret E. Keck & Sikkink, 1999, p. 98).

To apply these strategies for influence on environmental policy, the ENGOs need assistance, or an ally. According to the authors, "the stakeholder must seek out an ally who is able to manipulate the flow of resources to the firm" (Frooman & Murrell, 2005, p. 10). In terms of Green 10, even the EU institutions look like the ultimate point for environmental welfare, it is actually an ally to make pressure on companies, emitters, polluters to improve and monitor their environmental performance.

### **3.2. THE MEMBERS OF GREEN 10**

When we analyze the environmental NGOs, the objectives, the study areas, organizational capacity, projects/activities and many other features show a great variety. While the planet has large diversity, problems and actors which engage in these problems are diverse too. While the issues are diverse ranging from the habitat or species monitoring to community based conservation, the strategies would change from lobbying to political activism. In that sense, when the members of Green 10 are analyzed, we come across a comprehensive structure which covers a large part of this diversity. In this part, the study will examine each member according to their organizational characteristics, research areas and the gap that they fill with their studies.

It is important to mention that each member organization of Green 10 has a physical office in Brussels to communicate with EU institutions and monitor their activities closely except the Naturefriends International (NFI). The office of NFI is located in Vienna but has member organizations which work in Brussels.

### **3.2.1. CEE Bankwatch Network**

CEE Bankwatch Network is one of the oldest regional environmental networks in Europe. It is a network with the participation of 16 environmental groups in 14 countries in central and eastern Europe as well as the Caucasus and Russia. Bankwatch mainly works to monitor the public finance institutions that are responsible for hundreds of billions of investments all around the world. By doing that, it aims to prevent environmentally and socially harmful impacts of these investments and to promote alternative solutions as well as public participation. In cooperation with local communities and other NGOs, Bankwatch works “to create an influence on the public finance institutions and provide a counterbalance to their unchecked power”. The organization has a permanent representation in Brussels (CEE Bankwatch, 2020).

The focus issues of the Bankwatch can be listed as such;

- Monitoring the financial flows into the eastern and central Europe from various public sources, which are mainly the European Bank for Reconstruction and Development, the European Investment Bank and the World Bank. Bankwatch aims to “put pressure on these banks in order to improve their policies of funding for the benefit of people as well as the environment” (Green 9, 2005a).
- Following the use of public finance for the benefit of the public itself. Bankwatch organizes “launch campaigns against controversial finance projects which seek the public finance to follow the citizens’ money”. It closely monitors and examines the use of pre-accession and structural/cohesion funds to ensure that EU regional aids are not wasted

on unnecessary prestige projects but instead is transparently used “to promote sustainable and ecologically sound growth in the new member states” (Citizens for Europe, n.d.).

- Preventing the financial project for fossil fuel extraction. Bankwatch advocates for energy efficiency and renewable energy projects at the development banks. Thus, it aims to “persuade the banks not to fund the projects which are aiming at the fossil fuel extraction” (Green 9, 2005a).
- Greening the public funds for environmentally friendly transport. Bankwatch challenges the banks and the public donors to change their tendency of loan usage from fossil fuel related motorways, airports etc. to public transport projects.
- In addition to all, Bankwatch has activities on nuclear decommissioning, air pollution, land rights, waste management as well as democratic participation of citizens in decision-making processes (CEE Bankwatch, 2020).

### **3.2.2. BirdLife Europe and Central Asia**

BirdLife Europe and Central Asia is a regional partnership of national conservation organisations from 48 countries. It is the leading bird conservation organisation in the world. The main objectives of BirdLife are the conservation of birds, their habitats and global diversity, working with people towards sustainability in the use of natural resources. The organization believes that “the local to global conservation approach enables the BirdLife to deliver high and long-term impact for the conservation of nature as well as people” (BirdLife International, n.d.-a). BirdLife Europe and Central Asia is one of the six regional secretariats of BirdLife International with membership of 45 partner organizations (BirdLife International, n.d.-b). The organization is active in all EU Member States as well as candidate countries Turkey, North Macedonia, Serbia and Montenegro (European Commission, n.d.-e). In Turkey, Doga Dernegi is the member of BirdLife Europe and Central Asia (Doga Dernegi, n.d.).

BirdLife Europe has several policy works for the conservation of birds, environment as well as people. These works are diverse from agriculture to fisheries and aim to improve the EU environmental policy making and its implementation in Member States. There are several topics that BirdLife Europe focuses which are;

- EU environmental policy-making process
- Nature and biodiversity
- Species protection and hunting of birds
- Agriculture
- EU seabirds and marine
- Bioenergy
- Energy and climate change
- EU budget
- European forests (BirdLife International, n.d.-c)

The Birds and Habitats Directives is one of the most important issues for BirdLife Europe. It works “to ensure the full implementation of these Directives and monitor the effective management and financing of the “Natura 2000” network which is the wildlife conservation site in European continent” (BirdLife International, n.d.-d). Similarly, BirdLife closely monitors the progress of the EU’s Sustainable Development Strategy. On the other hand, the organization closely monitors the regional policies, like the EU Structural Funds, Fishery and Agriculture Policies. It works to ensure these funds for the conservation of nature and habitats rather than environmentally damaging finance and infrastructure projects. Additionally, it promotes campaigns for sustainable fisheries as well as sustainable agriculture strategies. Climate change and energy transformation are other key objectives of the organisation (Green 9, 2005a).

### 3.2.3. Climate Action Network (CAN) Europe

Climate Action Network (CAN) Europe is Europe's largest coalition with over 140 member organisations in more than 35 European countries working on climate and energy issues. It was established in 1989 "for environmental groups in Western Europe, working to limit human-induced climate change to ecologically sustainable levels". The main objective of CAN is to promote sustainable climate and energy policy in Europe (Green 10, n.d.-a). CAN-Europe visions a world that works "to protect the global climate by promoting equity and social justice between peoples, sustainable development of all communities and protection of the global environment" (Green 9, 2005a). The main goals of the organization are as follows;

- Empowering the civil society organizations "to create an impact on designation and development of effective climate change policy in Europe". This includes the European Union as well as European countries outside the EU. To do that, CAN provides a civil forum for NGOs to share ideas and expertise and support them to create strategies on climate change related studies (Green 9, 2005a).
- CAN Europe is a recognised civil society network on EU environmental policy and the UN climate negotiations. It closely monitors UNFCCC and encourages the implementation of policies in the EU environmental policy, especially European Climate Change Programme (ECCP) (CAN Europe, n.d.-a).
- Additionally, CAN Europe works on energy efficiency and renewable energy, emissions trading, the clean development mechanism, security of energy supply, fluorinated gases, carbon capture and sequestration, hydrogen economy, climate change links to health, transport and development issues (Green 9, 2005a).

Nature Conservation Centre (DKM), WWF Turkey, TEMA Foundation and KADOS are the members of CAN from Turkey (CAN Europe, n.d.-b).

### 3.2.4. EEB European Environmental Bureau

The EEB is an umbrella organisation of more than 160 civil society organizations from more than 35 European countries. The member organizations range from local and national, to European and international, together numbering more than 30 million individual members and supporters. The main visions of the EEB are sustainable development, environmental justice and participatory democracy (Green 9, 2005a).

The EEB organises and facilitates the involvement of its member organisations “to achieve effective EU environmental policies and sustainable development by agenda setting, monitoring, advising on and influencing the EU environmental policy-making process”. The focus areas of the EEB are diverse including climate change, biodiversity, pollution, circular economy, waste management as well as energy, agriculture, industry and product design. They can be classified in six categories which are;

- Nature, Agriculture and Water
- Climate and Energy
- Sustainability and Governance
- Industry and Health
- Global and Regional Policies
- Resource Efficiency (EEB, n.d.-a)

Sustainable development is one of the top priorities of the EEB. In cooperation with trade unions and NGOs platforms, EEB promotes the implementation of The EU Sustainable Development Strategy. Additionally, it works to put pressure on the EC and Member States for the integration of agriculture, industry policies and environmental fiscal reform. In terms of representation, TEMA Foundation is full of the EEB from Turkey (EEB, n.d.-b).



### 3.2.5. Friends of the Earth Europe

Friends of the Earth Europe (FoEE) is the largest grassroots environmental network in Europe with the participation of 34 national organisations. It is the European division of Friends of the Earth International. FoEE campaigns focus on the environmental and social justice issues and challenges for the current economic model and corporate globalization by promoting environmentally and socially sustainable solutions (Green 10, n.d.-a).

Some of the significant study areas of the FoEE are agriculture, climate justice, renewable energy and energy savings, banking regulations and corporate accountability, freeing from fossil fuels (FoE Europe, n.d.-a). At the European Level, FoE focuses several issues which are;

- Following the monetary funds in cooperation with CEE Bankwatch Network. FoEE monitors “the use of Pre-accession and Structural/Cohesion Funds to make sure that they really benefit people and the environment and are spent properly” (FoE Europe, n.d.-a).
- Combating climate change and its impacts by paying regard to ecological and cultural diversity as well as equity and environmental, social, economic and gender justice. FoEE works “to expose outdated and inefficient industries, and inactive politicians, showing alternatives and demanding real action to fulfil climate agreement” (FoE Europe, n.d.-b).
- Additionally, FoEE campaigns for GMO-free agricultural practices, toxic-free, nuclear-free Europe, sustainable, fair and democratic global trading system, environmental governance, resource use and waste management issues, monitoring European Parliament environmental decisions and corporate accountability/social responsibility issues (Green 9, 2005a).

### 3.2.6. Greenpeace Europe Unit

Greenpeace is an independent campaigning organisation with 27 national/regional organisations worldwide. It uses “non-violent creative confrontation to expose global environmental problems and encourage solutions which are essential to a green and peaceful future without any financial support from governments, the EU or industry” (Greenpeace International, n.d.). Greenpeace European Unit monitors and analyses the work of the EU institutions which are Parliament, Commission and Council, “to reveal deficient EU policies and laws, and challenge decision-makers to implement progressive solutions” (Greenpeace EU Unit, n.d.-a).

The main focuses of the Greenpeace European Unit are;

- Climate change and energy is one of the top priorities of GP Europe. It monitors policies that address climate change and works “to expose corporate complicity in preventing climate protection, and call on the EU to take action against the corporations”. Additionally, Greenpeace demands “concrete and ambitious actions in promoting renewable energy sources and energy-efficiency measures to create a nuclear-free and fossil-fuel-free EU” (Greenpeace EU Unit, n.d.-b).
- Greenpeace calls “for a strict application of the precautionary principle and an end to corporate control of food supply. It campaigns against GMOs and supports the traditional farming practices” (Green 9, 2005a).
- The pollution including plastic and hazardous chemicals is one of the significant study areas of Greenpeace European Unit. It calls for mandatory substitution of plastic and hazardous chemicals, encourages industry to support green innovation and demands that the EU protect the environment and human health from human-made plastic and chemical pollution. Additionally, Greenpeace Europe works for participatory democracy and people power issues in the EU (Greenpeace EU Unit, n.d.-b).

### 3.2.7. Health and Environment Alliance (HEAL)

The Health and Environment Alliance (HEAL) is a European not-for-profit organisation addressing how the environment affects health in the EU. The organization has over 80 members from the 53 countries of the WHO European Region. HEAL brings to Green 10 independent expertise and evidence from the health community to different decision-making processes. The main objective is “to influence the decision-making process in order to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future” (HEAL, 2019a).

HEAL focuses on four main issues which are;

- Health and diseases,
- Toxic chemicals,
- Climate and energy
- Air quality.

HEAL especially aims to “protect the most harmed and vulnerable groups by pollution which are fetuses, children, pregnant women and elderly” (HEAL, 2019a). To do that, HEAL organizes awareness raising events, share the evidence which its independent experts collect with policy-makers to change the laws. It monitors the health policies within EU institutions to identify the threats to the environment and health. Also it facilitates the participation of the civil society and stakeholders to the policy-making process by conducting publications, conferences, workshops and training (HEAL, 2019a).

Additionally, HEAL works to build knowledge about the opportunities for reducing common diseases rates such as cancer, heart disease, diabetes, obesity, Alzheimer’s disease and many others (HEAL, 2018). Only member of the HEAL from Turkey is the HASUDER (Association of Public Health Specialists) (HEAL, 2019b).

### **3.2.8. Naturefriends International**

The International Friends of Nature (IFN) is a non-profit umbrella organisation which unites 45 national member organisations within a broad network of local groups as well as regional, federal and national associations (Green 10, n.d.-a). It mainly focuses “on sustainable development, a professional commitment to the protection of nature and the environment and developing environmentally and socially balanced eco-tourism and leisure-time activities in theory and in practice”. Additionally, it works “for the protection of natural and cultural heritages” (Naturefriends International, n.d.).

The IFN promotes more connection between people and nature and makes it accessible, awakening and motivating people for nature itself and giving them knowledge about nature and culture. By doing that, it aims to “protect the natural and cultural landscape, to create transboundary solutions for the environmental problems as well as the sustainable land use and regional development” (Naturefriends International, 2017). In EU environmental policy, IFN pays special attention to the Natura 2000 programme of the natural habitats and its implementation across Europe. It focuses on the development of strategy papers for the model protected regions. Climate justice, sustainable consumption, green food, regional food products, ecological agriculture and environmental impacts of transport on health are other issues that the IFN campaigns for (Green 9, 2005a).

### **3.2.9. Transport & Environment**

T&E is an umbrella organization of non-governmental organisations working “for cleaner transport, sustainable mobility of people and freight”. T&E was founded in 1989. Today, T&E has been supported by 60 organizations from 25 countries across Europe (Green 10, n.d.-a). The main objective of T&E is to ensure a zero-emission mobility system which is affordable and has minimal impacts on

the community's health, climate and environment. T&E not only follows the EU legislative process, but also initiates debates and pushes pro-actively for action (Transport & Environment, n.d.).

T&E is a member of several expert groups on energy saving, carbon emission standards etc. to create science-based evidence to influence EU environmental policy. There are several study areas that T&E focuses which are;

- Transport pricing policy to maximise the benefits and minimize the costs of transportation for society. This policy includes not just infrastructure costs, but also the external costs like the costs of air pollution, accident risks, and congestion. By its activities, T&E aims to “ensure this policy comes to practice EU environmental policy”. Also, it monitors the European investment into transport infrastructure and promotes the climate friendly alternatives (Green 10, n.d.-a).
- T&E strongly emphasizes the aviation and shipping sector as forgotten modes of transport. It aims to “change global and EU environmental policies to tackle the large and growing problems these sectors generate”. T&E monitors the legislation in the EU and pushes for greener aviation and shipping policies. Additionally, T&E focuses on fuel efficiency, in particular for passenger cars to get them in a low-carbon transport sector by vehicle emission and fuel quality standards. Additionally, T&E campaigns on other issues like air quality, noise, urban and public transport policy (Transport & Environment, n.d.).

### **3.2.10. WWF European Policy Office**

WWF European Policy Office (WWF EPO) is part of WWF International that advocates and campaigns for better EU policies on the European and global environment. It represents 25 national and regional offices (Green 10, n.d.-a). The main mission is “to stop the degradation of the planet’s natural environment

and to build a future in which humans live in harmony with nature”. To do that, WWF campaigns “for conserving the world’s biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption” (WWF EU, n.d.-a).

There are several issues that WWF European Policy Office focuses which are;

- Climate and energy are one of the top priorities of WWF campaigns. It promotes a drastic increase in renewables and energy conservation to help the EU prepare for long-term climate protection through policy achievements such as a carbon-free power sector (WWF EU, n.d.-b).
- WWF EPO monitors the regional funds “to ensure that sustainable development is the primary objective of the EU funds and that funds are available for the implementation of the Habitats and Water Framework Directives”. Additionally it advocates “for sustainable management of natural resources and environmental protection to reduce rural poverty” (WWF EU, n.d.-c).
- Apart from these, WWF EPO campaigns for the forests “to achieve EU policies that protect, manage and restore forests in Europe; for the oceans to the implementation of the CFP (recovery of fish stock plans, establishment of Regional Advisory Councils, long-term management plans), and reduction of EU footprint on third countries; sustainable development, fresh water policy, agriculture and food systems by rural development as well as protection of biodiversity” (Green 9, 2005a).

### **3.3. GREEN 10 AS AN ADVOCACY NETWORK**

According to the literature, an advocacy network is defined as an organization which involves independent groups or NGOs to act cooperatively for influencing the policy-makers. These networks can be organized nationally, regionally or internationally (Margaret E. Keck & Sikkink, 1999, p. 91). The main objective for

this cooperation is the collaboration of the knowledge to create a change in the behaviour of decision-makers which could be governments, companies, or EU institutions.

The Green 10, as officially, defines itself as a coalition. However its organizational features do not reflect the coalition literature. In most cases, the Green 10 shows similarities to interest groups. For example, maximizing the influence on the political decision-making process is one of the key mutual features for interest groups and advocacy networks (Klüver, Mahoney, & Opper, 2015, p. 485). Other features of interest groups are their highly institutionalized structure, members involve heterogeneous groups of individuals and lobbying activities for gain more members (Klüver, Mahoney, & Opper, 2015, p. 486). Sierra Club, Greenpeace and RSPB (Royal Society for the Protection of Birds) are some of the significant examples of interest groups in the environmental context. However, the Green 10 differentiates from this literature and could be categorized as an advocacy network. The prominent features of the advocacy networks are low institutionalization, reliance on strength of information and number of members. In the following part, I will detail and match the criteria/features of advocacy networks and Green 10.

- Low institutionalized structure: Green 10 defines itself as an informal coalition of environmental organizations and networks. Because of this informality there is no foundation document of the coalition. Although each of the member organizations are highly institutionalized, Green 10 shows less institutionalized structure. The main features of this low institutionalization are no budget, rotation on the secretariat of the coalition, the very limited data and no archival documents which are accessible through its website and no social media accounts.
- Because of the structural features, Green 10 does not use the traditional sources of power but the strength of information instead. The coalition relies on the capacity and ability of information of its member

organizations. Additionally, the number of members, the study area of the organizations as well as their influence on these areas, leading capacity and their symbolic meanings strengthen Green 10's hand. The 10 leading ENGOs/networks are not just important leaders in Europe but around the globe. The strong local network and more than 20 million supporters are strengths of the coalition. Additionally these members represent strong symbolic meanings for the community like Greenpeace. In this sense, Greenpeace is not just an ENGO but also a global environmental movement.

- The Green 10 is based on voluntary cooperation and horizontal structure. The evaluation from Green 8 to Green 10 by separation and participation of new members is the best example for this feature. Additionally, no decision-making and administration structure and rotation on the secretariat are important features. Furthermore, because of this low institutionalized and horizontal structure, the coalition is able to act flexible and give quick reactions to political developments.
- The high capacity and ability of information of the member organizations makes Green 10 influential and adaptive on environmental policies. The main reasons for this information use are firstly to highlight the existing policy issue and secondly to draw attention to issues to reach a larger audience. On the one hand, the coalition uses this information to communicate with the policy-makers to change their perceptions, preferences and behaviours. On the other hand, the social networks of the members give change to the Green 10 to reach a wider media and community.
- The member organizations have physical offices and staff who are located in Brussels. Because of that, they are able to interact with the EU institutions as well as key individuals and leaders by personal and working relationships. Thus, the Green 10 finds a chance to access



policy-makers first hand and strengthen itself for the joint responses and recommendations.

- Lastly, the conventional and unconventional strategies of Green 10 members like lobbying, protests and petitions makes the Green 10 more visible and influential on environmental politics in the EU. But it is important to mention that the Green 10 does not organize or lead this kind of campaign except lobbying but adopting the members' to itself.

As detailed above, the Green 10 shows the characteristics of the advocacy networks such as low institutionalization, reliance on strength of information and number of members. From the theoretical approach, it is possible to accept the Green 10 as an advocacy network since its creation with eight founder members and evolve to the Green 10. Even though each member ENGOS have a different organizational features, Green 10 represents a collective action for mutual objectives of these ENGOS. In the following chapter, the analysis of the thesis to understand the influence of Green 10 on the EU environmental legislation is detailed through the analysis of a comprehensive dataset.

## **CHAPTER 4**

### **AN ANALYSIS OF GREEN 10 AND THE EU ENVIRONMENTAL POLICIES**

This chapter aims to analyse the relationship between the Green 10 and the development of EU environmental policies. By doing that, it tries to compare and contrast Green 10's policies with the environmental legislation of the EU.

The chapter firstly summaries the environmental laws of the EU on each environmental issue. Secondly, it examines the formal connections between the Green 10 as well as its members and EU institutions. The financial links, meetings, the participation to the public consultations and the membership status to the expert groups have been analysed with simplified charts. Thirdly, the Green 10's position, recommendations and their impacts on the legislation has been analysed in a timeline for each environmental issue including climate change. It is important to mention that the agriculture and trade policies did not include into the analysis. Although the Green 10 has policy proposals and recommendations on these issues, they are broad subjects that need more focused studies. However, some multi-directional issues like GMOs and pesticide use or trade agreements on hazardous substances have been included in the related titles such as Food Safety or Chemicals.

#### **4.1. THE SUMMARY OF ENVIRONMENTAL LAWS OF THE EU**

EU environmental legislation is a relatively clear and unambiguous system with distinctly categorized subjects (EUR-Lex, n.d.). It basically consists of hundreds of Regulations, Directives and Decisions as mentioned in the previous chapters. Here, the environmental legislation has been summarized with the key policies.

### 4.1.1. Climate Change

The legislation on the climate change issue is more complex than other environmental subjects. It is because all other environmental subjects have direct or indirect impact on climate change. For example, when we consider the energy policy, it is necessary to assess the impact of energy resources on the level of emissions, or in the case of nature protection, it is critically important to prevent deforestation to ensure the carbon sinks. So, the climate change legislation shows a high level of interaction with the other environmental issues mentioned in the previous chapter.

The frame of the climate change policy of the EU has been formed by the Paris Protocol since 2015, as previously the Kyoto Protocol (European Commission, 2015). Additionally, the Regulation on “the mechanism for monitoring and reporting GHG emissions and other information relevant to climate change” is a keystone of the EU’s climate change policy (European Parliament & Council of the European Union, 2013a). In the following table, the major binding legal acts as well as on climate change legislation has been listed.

**Table 5.** The list of major binding legal acts on climate change

No	Title of the Legislation	Act No
1	Programme for the environment and climate action (LIFE) (2014-2020)	Regulation 1293/2013
2	Reducing man-made GHGs (fluorinated gases)	Regulation 517/2014
3	The polluter-pays principle and environmental liability	Directive 2004/35/EC
4	2020 climate and energy package	Directive 2009/28/EC
5	Cleaner fuels for road transport	Directive 2009/30/EC

6	The EU's approval of the Kyoto Protocol to the UNFCCC and the joint fulfilment of commitments there under	Decision 2002/358/EC
7	The EU of the Doha Amendment to the Kyoto Protocol to the UNFCCC	Decision 2015/1339
8	Reducing GHGs by 2020: Effort Sharing Decision	Decision 406/2009/EC

**Source:** Author's compilation from the official website of EUR-Lex

These mentioned legal acts are important binding laws to understand the climate policy pattern in the EU environmental legislation. So, a short summary of each binding act shared in below.

'Programme for the environment and climate action', shortly known as LIFE Programme, is the environmental funding programme of the EU. It comprises two sub-programmes which are environment and climate action. In terms of the climate programme, it financially supports the innovative projects in its three priority areas which are mitigation, adaptation and governance of the climate change (European Commission, 2016b). It is an important financial instrument of the EU and ENGOs in all around Europe are actively benefit from the funds including Green 10 members such as EEB, CAN and T&E (European Commission, n.d.-f). However, the climate change programme only represents 25% of the overall budget of LIFE for the period of 2014-2020 (European Commission, 2018a).

The Regulation on the reducing man-made GHGs (fluorinated gases) is the revised version of the Regulation dated 2006. It aims to cut the emissions of fluorinated greenhouse gases (including hydrofluorocarbons, perfluorocarbons and sulphur hexafluorides) levels by two thirds of 2014 levels by 2030. To achieve this aim, it prohibits the products that contains these gases and sets

obligations on market to prevent climate impact (European Parliament & Council of the European Union, 2014a).

The polluter-pays principle and environmental liability is a fundamental feature of the EU environmental policy. It defines the actors and the liability for environmental damage. The Directive shortly means if a company causes environmental harm, “it is responsible for its consequences and must take the necessary action to prevent or bear all the related costs” (European Parliament & Council of the European Union, 2004). These harms cover environmental damage on water sources, land, protected species and natural habitats.

The Directive on the 2020 climate and energy package is a set of binding legislation that regulates the climate and energy target of the EU for 2020. The package covers three key targets which are “20% cut in GHG emissions (from 1990 levels), 20% of EU energy from renewables and 20% improvement in energy efficiency” (European Commission, 2017a). The Directive came into force in 2009, however there are debates on achieving these targets at the end of 2020 because of the Coronavirus outbreak (Douglas, 2020). Additionally, in 2009, the Decision on “Reducing GHGs by 2020: Effort Sharing Decision” had been adopted with the binding targets “to reduce GHG emissions from the sectors which are not included to the EU Emissions Trading System such as transport, buildings, agriculture and waste” (European Parliament & Council of the European Union, 2009a). However, the Decision was not including the aviation and maritime shipping.

With the aim the reducing on GHGs based on transport fuels, the Directive on Cleaner fuels for road transport dated 2009 had been established as the revised version of its premise dated 1999. It sets new requirements for “the fuel quality in a range of elements, including fuel specifications, monitoring mechanisms to reduce GHGs and sustainability of biofuels” and defines 6% emissions reduction per unit of energy from fuel by 2020 (European Parliament & Council of the European Union, 2009b).

The EU's approval of the Kyoto Protocol to the UNFCCC and the joint fulfilment of commitments thereunder is the legal approval of the EU to the Kyoto Protocol. It had been adopted in 2002 with "the commitments to 8% cut in GHGs compared to 1990 levels" (European Parliament & Council of the European Union, 2002). This Decision refers to the first commitment period to the Kyoto Protocol. As the second period, the Decision on the EU of the Doha Amendment to the Kyoto Protocol to the UNFCCC had been adopted with "the EU's formal approval to the agreement reached at the Doha Conference in 2012" (European Parliament & Council of the European Union, 2013b).

#### 4.1.2. Protection of Nature and Biodiversity

After the climate legislation, protection of nature and biodiversity is the most complex environmental legislation of the EU. It fundamentally involves legal acts on the biodiversity, management of natural resources as well as marine resources, conservation of fauna and flora, protection of forests and the GMOs as the food safety regulations.

**Table 6.** The list of major binding legal acts on protection of nature and biodiversity

No	Title of the Legislation	Act No
1	Conservation of certain stocks of migratory fish	Regulation 1936/2001
2	Protecting vulnerable marine ecosystems	Regulation 734/2008
3	Combating illegal logging	Regulation 995/2010
4	Protecting biodiversity from invasive alien species	Regulation 1143/2014
5	Protecting Europe's biodiversity (Natura 2000)	Directive 92/43/EEC
6	Conservation of migratory species - Bonn Convention	Decision 82/461/EEC
7	Bern Convention	Decision 87/72/EEC
8	Convention on Biological Diversity	Decision 93/626/EEC

**Source:** Author's compilation from the official website of EUR-Lex

### 4.1.3. Pollution

The legislation on the pollution covers mainly the air pollution, water pollution as well as noise pollution. Additionally, waste management is the key issue for the pollution legislation of the EU.

**Table 7.** The list of major binding legal acts on pollution and waste management

No	Title of the Legislation	Act No
1	End-of-life vehicles	Directive 2000/53/EC
2	National emission limits for certain air pollutants	Directive 2001/81/EC
3	Cleaner air for Europe	Directive 2008/50/EC
4	EU waste management law	Directive 2008/98/EC
5	Industrial emissions	Directive 2010/75/EU
6	Safe management of nuclear waste	Directive 2011/70
7	National emissions of certain atmospheric pollutants	Directive 2016/2284
8	Single-use plastics ban	Directive 2019/904
9	Geneva Convention on Long-Range Transboundary Air Pollution	Decision 81/462/EEC
10	Vienna Convention for the Protection of the Ozone Layer	Decision 88/540/EEC
11	Montreal Protocol on substance that deplete the ozone layer	Decision 88/540/EEC
12	Basel Convention on the control of transboundary movement of hazardous wastes and their disposal	Decision 93/98/EEC
13	Stockholm Convention on tackling threats posed by chemicals	Decision 2006/507/EC

**Source:** Author's compilation from the official website of EUR-Lex

#### 4.1.4. Water and Soil Protection

Water protection legislation is one of the most comprehensive legal act systems in terms of issue coverage, particularly EU Water Directive because of its general framework (European Parliament & Council of European Union, 2000a). From ground to surface waters and from rivers to ocean, it regulates the standards to protect the water resources.

**Table 8.** The list of major binding legal acts on water and soil protection

No	Title of the Legislation	Act No
1	Protecting the sea and the food chain from the effects of organotin compounds	Regulation 782/2003
2	Marine pollution from ships and gas and oil installations	Regulation 911/2014
3	Drinking water-essential quality standards	Directive 98/83/EC
4	Landfill of waste	Directive 1999/31/EC
5	Good-quality water in Europe (EU Water Directive)	Directive 2000/60/EC
6	Protection of groundwater against pollution	Directive 2006/118/EC
7	Strategy for the marine environment	Directive 2008/56/EC
8	Environmental quality standards applicable to surface water	Directive 2008/105/EC
9	Civil liability for oil pollution damage: Bunkers Convention	Decision 2002/762/EC

**Source:** Author's compilation from the official website of EUR-Lex

#### 4.1.5. Other Related Policies

In addition to all legal acts that have been highlighted in above on key environmental issues, there are several closely related issues which are critically important to mention which are listed in the following table.



**Table 9.** The list of major binding legal acts on Energy, Transport, Maritime Affairs & Fisheries and Food Safety

<b>No</b>	<b>Title of the Legislation</b>	<b>Act No</b>
1	Information on investment projects in energy infrastructure	Regulation 617/2010
2	Energy consumption: Framework for labelling rules	Regulation 2017/1369
3	GHG emission allowance trading system	Directive 2003/87/EC
4	2020 climate and energy package	Directive 2009/28/EC
5	Energy performance of buildings	Directive 2010/31/EU
6	Energy efficiency	Directive 2012/27/EU
7	Safety of offshore oil and gas operations	Directive 2013/30/EU
8	Renewable energy	Directive 2018/2001
9	Eliminating illegal and unreported fishing	Regulation 1005/2008
10	The EU's common fisheries policy	Regulation 1380/2013
11	European Fisheries Control Agency	Regulation 2019/473
12	Conservation of fisheries resources and protection of marine ecosystems	Regulation 2019/1241
13	Reduction in CO <sub>2</sub> emissions of new passenger cars and of new light commercial vehicles	Regulation 2019/631
14	CO <sub>2</sub> emission performance standards for new heavy-duty vehicles	Regulation 2019/1242
15	Genetically modified food & feed	Regulation 1829/2003
16	Protecting health and the environment from persistent organic pollutants	Regulation 2019/1021
17	EU action to achieve the sustainable use of pesticides	Directive 2009/128/EC

**Source:** Author's compilation from the official website of EUR-Lex

## 4.2. THE ANALYSIS

Being an influential ENGO in the EU environmental policies means that this ENGO is able to create impact and shape the political decisions in parallel with their policy preferences and recommendations. Hence, a necessary condition for this impact is the coincidence of the policy preferences of an actor with the output of the political decision-making process. However, the influence on the policy issue does not mean that ENGOS are able to shape the outcome. The convergence of policy preferences of the ENGOS with policy outputs is only a necessary, not a sufficient condition for defining the influence. It can be, for example, the case that ENGOS or coalition of Green 10 for our case simply get what they want since other actors with the same policy goal are influencing the European institutions. It means that these ENGOS might just be lucky to get what they want. So, policy change could emerge because of its influence or just because of simple coincidence.

To find answers to the research questions, this research follows several different methods. First of all, it is clear that if the Green 10 is able to influence the decision-making process, it is sure that there has to be a causal connection between the coalition and EU institutions. This connection could be bargaining power, scientific/technical expertise that ENGOS provide or activism/actions that the ENGOS organize to make pressure on decision-makers. In the first round, connection of each member ENGOS with EU institutions has been analyzed according to their financial connection/funding status, the meetings with the Commission and consultative status. In the second round, the documents that were published by Green 10 and EU institutions have been examined and compared according to their topics, aims and outcomes.

On the other hand, the luck factor is still on the agenda. The Green 10 could take what it tries to get, but the factors that impact the policy output can be not related to Green 10 or no systematic factor could be detected. For example, when Green 10 makes pressure on reducing carbon emissions to the EU

Commission, the reduction of carbon emissions could already be on the agenda of the Commission or public opinion could be the main driver in this process. In that kind of case, it is still data and means no statistically important impact could be detected.

However, one last possibility exists in that analysis. This method fundamentally belongs to Brian Barry in “Is it better to be powerful or lucky?” (1980) and Keith Dowding in “Resources, Power and Systematic Luck: A Response to Barry” (2003). The latest version of the method is explained by Heike Klüver in “Lobbying in the European Union” (2013) to make the classic distinction between influence defined as the ability of an actor to shape a decision in line with his preferences and luck. According to this method, even if the policy output results in the expectations of the Green 10 and no connection detected because of the luck factor, it is still possible that the decision-makers influenced by the Green 10 because of their existing studies. It does not mean that all policy output exists because of luck. For example, when the biodiversity loss on the agenda and the Green 10 did not make any documentation on that topic but the topic is a key issue for its member ENGOs. When a policy output emerges on biodiversity loss from the EU, we can still accept some influence of Green 10. Because there might be undetected-unobserved actors and links that could shape the policy output, which can be accepted as influence.

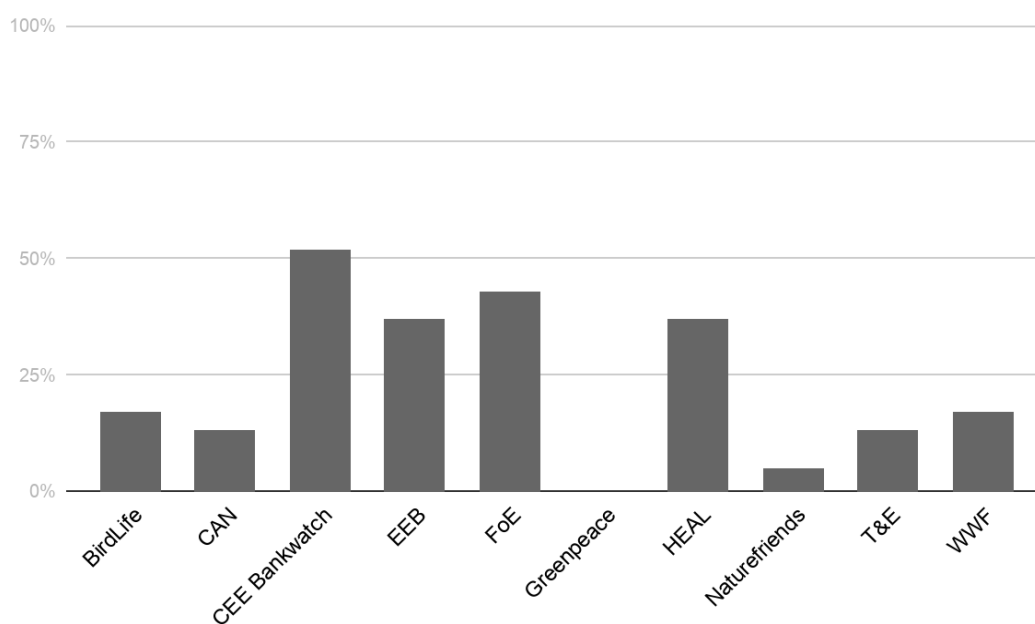
#### **4.2.1. The Relationship between the Members of Green 10 and the EU**

##### **4.2.1.1. Financial Dependency**

As mentioned in its official website, the budget of Green 10 comprises the contributions of its member ENGOs (Green 10, n.d.-a). According to the Transparency Register, in the financial year of 2018, the Green 10 financed with EUR 42,525 as contributions from members. Except that, the Green 10 did not take any funds from any funding source including public, national, local or

regional sources and donations. The budget shapes “from the budget line items in each of the individual organisations’ annual budgets” (European Commission, n.d.-g).

**Figure 6.** The percentage of EU funds on the budget of Green 10 members as of 2018



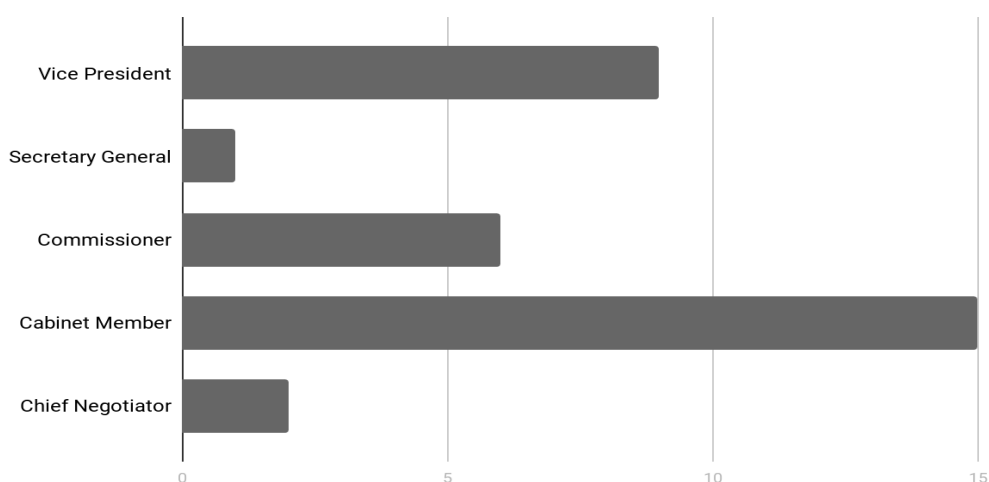
**Source:** Author’s own compilation from the profile of Green 10 in the Transparency Register

However, it does not mean that Green 10 is a financially independent organization apart from the EU as long as its members take funds. As could be seen in the Figure.6, EU funds are not the majority of budgets for the most of the Members. On the other hand, like in the CEE Bankwatch Network and Friends of the Earth Europe, it still covers a significant percentage of overall budget. Apart from all of these, there is no publicly available source to detail the annual expenses of the Green 10 or contribution rates of each member ENGOS to the Green 10.

#### 4.2.1.2. Meetings of Green 10 with the Commission

One of the most important formal connections between the EU and the Green 10 is the random meetings. The list of these meetings are publicly available because of the legislation numbered as 2014/838/EU, Euratom and 2014/839/EU, Euratom. According to these records, the Green 10 had 26 meetings with the Commission. Some of the meetings held with a single representative such as the First Vice President and some others with a group of representatives. In these meetings, the subjects are diverse in all environmental issues but they are generally a package of discussion with inclusion of several of these issues (Tranparency Register, 2020). The minutes of these meetings are not publicly available through open sources.

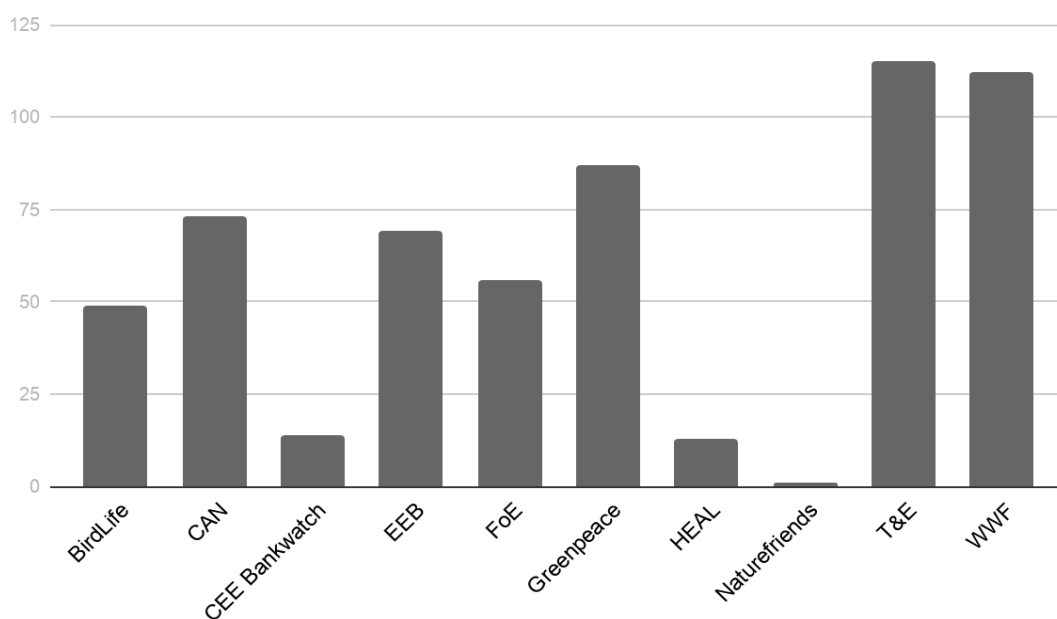
**Figure 7.** Distribution of Commission Representatives who chair the meetings with Green 10 between 2014 and 2019



**Source:** Author's own compilation from the Transparency Register

On the other hand, the Members of Green 10 had much more meetings than the network itself. When we analyse the list of meetings, Transport & Environment and WWF are well ahead with more than 100 meetings. On the contrary, the CEE Bankwatch Network had less than 15 meetings.

**Figure 8.** The number of meetings of the Green 10 Members with the Commission between 2014 and 2019



**Source:** Author's own compilation from the individual profile of Green 10 members in the Transparency Register

#### 4.2.1.3. Consultative Status

For the preparation of legislative proposals and policy initiatives, as well as the implementation of these legislation, programmes and policies, the EU needs specialist advice from outside experts. This need could be provided by groups of experts or external consultants. In that term, Green 10 consists of ten leading ENGOs that have expertise on their study areas. To gather the expertise of these various sources, the Commission set up expert groups that its members could share their views, recommendations or objections (European Commission, n.d.-h). In the following table, the current status of the Green 10 members to the expert groups has been illustrated.

**Table 10.** Membership Status of Green 10 Members  
to the Commission Expert Groups as of 2019

Name of the Green 10 Member	Number of Expert Group Membership	Membership Status	
		Member	Observer
<b>BirdLife</b>	14	13	1
<b>Bankwatch</b>	2	1	1
<b>CAN</b>	7	7	-
<b>EEB</b>	29	23	6
<b>FoEE</b>	8	7	1
<b>Greenpeace</b>	5	3	2
<b>HEAL</b>	2	-	2
<b>Naturefriends</b>	-	-	-
<b>T&amp;E</b>	11	11	-
<b>WWF</b>	18	15	3

**Source:** Author's own compilation based on data from  
the Transparency Register

Apart from these, only the EEB is in a different Commission group. It is a member of the Advisory Board of Intergroup on "Climate Change, Biodiversity and Sustainable Development" (European Commission, n.d.-i).

#### 4.2.1.4. An Analysis of the Relationship between Green 10 and the EU

How can we read all these datas? When we compare the three figures (Figure.3, 6 and 8) and the Table.10, it is possible to illustrate a picture about the correlation between the EU funding percentage on the budget of the

members and their general attitude and capacity to criticise the EU environmental politics.

First of all, it is clear that the members which take limited EU funds such as T&E, WWF, BirdLife and CAN and those that take no fund like Greenpeace, are more intensely meeting with the Commission. While the Greenpeace, T&E and WWF have the least percentage of EU funds, they are the top three members that have more meetings. Conversely, CEE Bankwatch which EU funds covers a significant percentage of their budget, has a limited number of meetings with the Commission. Not as more distinct as the mentioned ENGOs, other members (except the Naturefriends because of its overall low structural capacity (European Commission, n.d.-j) show similar but balanced correlation between the budget and the meeting.

Secondly, there is another correlation between the budget and the ability to criticize. As highlighted in the Figure.3, some members contribute to the public consultations more than others. WWF, EEB, CAN, T&E and Greenpeace are the top five organisations with their number of public consultations. Otherwise, CEE Bankwatch, FoEE and HEAL are the least contributed members to the public consultation. When we examine from the budget perspective, these three members have also the highest percentage of EU funds in their budget.

Thirdly, each of the members (except the Naturefriends) take part on the expert groups of the Commission. EEB, WWF, BirdLife and T&E are the top four ENGOs that have more membership in these expert groups. At the same time, they are the organization that has the least EU funds percentage in their overall budget. They are more actively involved in these expert groups than other members to reflect their view on EU environmental policy.

Shortly, it is possible to evaluate that the more financial dependency of the organizations to the EU funds, makes them withdrawn and less critical against the EU environmental policy. On the contrary, the limited EU funds on the



overall budget makes the ENGOs more pushing and critical. When we consider the general attitude of these organisations like BirdLife, CAN, Greenpeace, WWF and T&E, they are more extraverted ENGOs among others, in terms of public relations, study areas, number of members/volunteers/activists as well as structural capacity.

#### **4.2.2. The Subject-Focused Analyses**

In that section, the interaction between Green 10 and the environmental policies of the EU has been analysed for 12 main subjects. These are climate change, nature protection and biodiversity, pollution and resource management, chemicals, energy, transport, maritime affairs and fisheries, food safety, transparency, sustainable development, budget and environmental liability. It analysed the 20 years of Green 10's activities in a timeline and examined each stage in the light of environmental legislation developments of the EU and the impacts of recommendations of the Green 10 on these legislations.

As mentioned in the beginning of the chapter, the agricultural policies and trade policies had been excluded from this analysis, because they are broad in scope which large parts of them do not match with the focus of this research. However, the recommendations of Green 10 on these issues had been included to the related subjects if suitable. For example, environment related agricultural developments have been included in food safety.

Apart from these major subjects, there are some key issues which are important to mention. These issues had made the Green 10 busy for short periods of time in the last 20 years (Green 8, 2003a; 2003b). The first one is the preparation of a "Constitution for Europe" in the frame of the European Convention in the beginning of the century (European Convention, 2003). The Green 10, in that term, had actively participated in the process with its policy proposals and assessments to ensure the strong environmental capacity of the Convention

(Green 8, 2003c; 2003d). The final text of the draft Treaty had been submitted in 2003 and signed in 2005. However, it was not ratified in national referendums of France and Netherlands, although 18 Member States had ratified the Treaty, thus the process ended (Fontaine, 2010, p. 13).

Secondly, the Green 10 had carried out intense lobbying efforts against the President Jean Claude Juncker and his Commission in 2014. Several open letters, policy proposals and assessments had been published to criticise the commitments of the Commission on the environmental concerns. According to the Green 10, the Commission was not fully empowered to ensure the environmental objectives, instead it was focused on economic growth (Green 10, 2014a). Additionally, the Commissioners had been criticized because of their links to the fossil fuel industry and lack of commitment to the environment (Green 10, 2014a). However, the efforts of Green 10 which highly focused in 2014 had dramatically fallen in 2015 without any clear impact on the Commission.

Third and lastly, advocacy of the civil society was an important issue for the Green 10 that took the lead. In its two open letters, Green 10 acted to protect the rights of several ENGOs like the Deutsche Umwelthilfe (DUH) and the ClientEarth against the national governments (Green 10, 2012a; 2018).

#### 4.2.2.1. Climate Change

In terms of climate change, there had been several significant issues in the beginning of the century. The Kyoto Protocol had been ratified during this period by the Prodi Commission. The Commission had worked to encourage other industrialized countries to ratify the Kyoto Protocol. The global leadership role of the Commission was recognisable on this issue, except the failed attempts to convince Russia to ratify the protocol. However, the commitments of the

protocol contradicted by promoting fossil fuel extraction and exploration in WTO negotiations (Green 8, 2002).

Additionally, several climate-related initiatives like the EU-wide emissions-trading scheme, Voluntary Commitment on Fuel Economy and legislative action for Fluorinated Gases were proposed and adopted (European Parliament & Council of the European Union, 2014a). The voluntary commitments comprised the improvement of the fuel economy of carmakers by 25% (European Commission, 2002).

For the post-2003 period, there had been several recommendations of Green on climate change policies. To begin with, Green 10 argued that the Commission should ensure for equitable long term targets on emissions reductions and a threshold target of no more than 2 degrees temperature rise over pre-industrial period in the meeting of the UN Convention on Climate Change in 2003. Furthermore, the effort to convince the Russian administration to ratify the Kyoto Protocol should be continued. Under the EU Emission Trading Directive, Green 10 recommended that the Commission should set effective targets for emissions reduction to prevent the directive becoming a pure trade directive without any clear environmental benefit. Then, the limits on the quantity and type of credits should be clearly identified by the Commission to give priority to emission cuts at home. By doing that, it could exclude any possibility that the countries use “Joint Implementation and Clean Development mechanisms” to abuse for their interests according to Green 10’s recommendation (Green 8, Micciche, & Riss, 2003).

Moreover, Green 10 argued that the voluntary agreement with car-makers on CO<sub>2</sub> emissions reductions had problematic features in terms of car-makers’ ability to meet their commitments and its short-term impacts. The Commission’s own figures already indicated that total CO<sub>2</sub> emissions from cars will be rising again from the year 2020 onwards because of expected demand growth. So, the technical background of the voluntary agreement should be revised with

realistic targets. Additionally, the deadlines for phase-out from GHGs should clearly define and implement in the newly preparing The Fluorinated Gases Regulation.

Although Green 10's recommendations, the policy developments were evolved differently between 2004 and 2009. The progress on the Kyoto targets slowed down while the GHG emissions rapidly rose from the transport. In its 2007 Communication, the Commission proposed future targets for the EU emissions reduction, renewable energy, energy efficiency and '20% unilateral- 30% conditional' (-20% for unilateral action, to be raised to -30% if other countries take part, including the possibility to offset a major part of these targets abroad) formula was agreed (European Commission, 2007a). However, these targets were inconsistent with the EU objective of keeping global warming below 2 degrees Celsius. Details for national implementation of the EU Emission Trading System (EU ETS) were being agreed with governments in 2005. Nevertheless, both the Commission and the Member States failed to implement their national targets for 2005-2007. The Commission's approval process has become "much stricter for 2008-2012 in expectation about 6-7% of emissions cuts" (Green 8, 2004a).

Besides all, several other steps were taken for related issues. Renewable energy targets had been agreed and support measures were being implemented by Member States. For the forests, the Commission made some suggestions on reducing emissions from deforestation and forest degradation, but no further action could be taken. The Regulation on Fluorinated Gases, adopted in 2006, does "not take into account the existence and the availability of climate-friendly alternatives and fails to tackle these potential GHGs within the EU" (Green 10, 2009a).

On the other hand, Green 10 had concerns about the last five years' developments on climate change. For the post-2009 period, Green 10 recommended that the Commission should secure the Member States'

commitment on emissions mitigation targets as at least domestic 30% by 2020 and a more than 40% greenhouse gas reduction target compared to the 1990 levels (Green 10, 2007a). Correspondingly, the Commission should strengthen the EU ETS trading period for 2008-12 to ensure Kyoto target, while the additional legislation on sectors such as energy, agriculture, transport, chemicals, buildings etc. should propose to fulfill the climate and energy targets agreed at the March 2007 Spring Council. Secondly, Green 10 argued that the long-awaited Adaptation Green Paper is a needed complement “to existing climate change Communications and in international climate negotiations, Europe must take the lead to reach a fair global climate agreement to limit global warming to as far below 2 degrees Celsius as possible” (Green 10, 2008). Thirdly, additional funds (at least EUR 35 billion annually) should be mobilised by EU countries to support developing country efforts on climate action (Green 10, 2009b). Also, new emission performance standards for all new and existing power stations should propose. Lastly, an effective mechanism to reduce emissions from deforestation under the new climate regime should be prepared and a respective action plan should be proposed before the end of 2010, according to Green 10’s recommendations.

While Green 10 recommended significant policy developments, its practical reflection were not effective enough for 2010 to 2014. The low-carbon economy strategy of the Commission showed insufficient progress during that period. The climate targets for the higher benefits on the economy and health could not be achieved. The Commission also “stood firm on the integration of aviation in the Emissions Trading Scheme (ETS) despite international pressure” (Green 10, 2012b). As a positive step, the new EU budget proposal specified 20% of the funds for the climate action. However, the European Investment Bank (EIB) almost doubled (from EUR 2.8 billion to 5 billion) the funds given to fossil fuels projects between 2007 and 2010, in spite of the progressive climate goals of the Commission (CEE Bankwatch Network, 2011).

To reach the overall climate targets, Green 10 argued that develop and defend policies in all sectors to keep global temperature increase below 2 degrees by at least 30% domestic emissions cuts in the EU. Accordingly, the EU had to contribute to the international climate negotiations with more ambitious targets, new funding sources for adaptation and mitigation as well as the effective strategies for biodiversity loss and emission reductions according to Green 10. In the Europe zone, Member states should be encouraged to fund measures to mitigation and adaptation strategies and to protect forests globally. Additionally, effective solutions should be created to fix the EU Emissions Trading Scheme and to ensure emissions cuts and green investments. For the post-2012 period, Green 10 recommended that “the implementation of key issues such as more harmonised allocation, full auctioning of permits and a strict quality and quantity control of project credits entering the EU ETS from outside should be ensured”. In terms of the energy, “the free emission allowances of the power sector from the eight Eastern and Central European countries should be assessed carefully” (Green 10, 2012b). Lastly, Green 10 argued that new proposals should be developed for a 2030 climate and energy package with ambitious emission cuts, energy efficiency and renewable energy targets. Also sufficient funds should be ensured for clean energy and overall climate-related spending in the new EU budget. Relatedly, the Article 75 Committee The Industrial Emissions Directive on limitation of air pollutant emissions should be kept without change (Green 10, 2017a).

In the last five year period between 2014 and 2019, there were very significant and radical developments in the climate change policy of the EU. First of all, the EU’s objectives on climate change had been endorsed to the commitments of the Paris Agreement after 2015. The overall target of the Paris Agreement to limit the global temperature rise to below 2°C had become the main ambition of the EU. In that term, the EU had set several goals to achieve this target (Council of the European Union, 2020). Like in the previous period, the climate and energy framework had been adopted in 2014 to set the targets for the post-2020. Secondly, the commitment to reduce GHG emissions had been revised

as at least 40% by 2030 compared to 1990 levels (Council of the European Union, 2014). Thirdly, the new limits on emissions had been set for cars and vans as nearly 30% less CO<sub>2</sub> by 2030 compared to 2021 levels (Council of the European Union, 2019a). Similarly, the manufacturers of trucks and other heavy-duty vehicles had been obligated to cut CO<sub>2</sub> emissions by 15% by 2025 compared with 2019 levels (Council of the European Union, 2019b).

In terms of the energy issue, the clean energy package had been adopted with the revised directives on energy efficiency and renewable energy (Council of the European Union, 2018). Additionally, in 2018, the EU Emissions Trading System was revised for the period of 2021-2030 with the objective to reduce emissions by 30% by 2030 (European Parliament & Council of the European Union, 2018).

#### 4.2.2.2. Nature Protection and Biodiversity

According to the Green 10's evaluation, biodiversity was declining rapidly in the EU in the beginning of 2000s. Nonetheless, the 6th Environmental Action Programme was not satisfying to provide indicators that would allow evaluation of the deterioration of biodiversity effectively (Green 8, 2002). On the other hand, the proposals to green the Common Agricultural Policy (CAP) and Common Fisheries Policy (CFP) were right steps but needed radical reforms on EU regional policy. Additionally, financing the Natura 2000 network was completed by approval of EU Biodiversity Action Plans after years of deal, but the environmental integration of forestry policies remained marginal (Green 8, Micciche, & Riss, 2003).

In that context, Green 10 had some recommendations for the post-2003 period. At the outset, it argued that the 6th Environmental Action Programme should be fully implemented on all Member States and legal proceedings should start without hesitation for members which breach EU nature conservation

legislation. Then, the all lists of “Sites of Community Importance” for the EU-15 should be finalised by June 2004 and a comprehensive proposal to ensure co-financing for Natura 2000 protected sites should be presented immediately. Lastly, the import of all wild bird species as trade should be banned according to Green 10’s policy proposals (Green 10, 2006a).

On this basis, the EU Action Plan on Forest Law Enforcement Governance & Trade (FLEGT) “to combat illegal logging and its associated trade and enhance consumption of sustainably-produced products” adopted in 2003 (European Commission, 2003a). According to Green 10’s evaluation, the EU had proven its global leadership role in combating illegal logging. However, the promised report on additional measures to combat the illegal timber trade for mid-2004 had been repeatedly postponed. Similarly, the high-profile issues such as climate change, poverty reduction and sustainable development did not take sufficient importance from the Commission at the beginning, especially the commitments that outlined in the 6th Environmental Action Programme and the 2010 targets of halting biodiversity decline (Green 10, 2007a).

It is possible to sort the positive and negative developments of the policies for the period of 2004 and 2009. In the positive aspect, the Millennium Ecosystem Assessment report had been published in 2005 that showed the importance of implementing the Nature Directives such as Natura 2000 sites protection or hunting law (Millennium Ecosystem Assessment, 2005). Additionally, the Biodiversity Communication and Action Plan had been published in May 2006 which covered all the priority issues and areas to reach the 2010 targets (European Commission, 2006a). On the other hand, there were several negative developments in that period. According to Green 10, the Commission’s position on the financing Natura 2000 and LIFE+ Regulation had created major problems on funding nature and biodiversity protection. The ring-fence funding for Natura 2000 in the 2007-2013 EU budgets had been refused. The environmental priorities could not be implemented even if they were clearly identified (Green 10, 2007a). Besides, the nature and biodiversity objectives did



not integrate to the works of DGs other than DG ENVIRONMENT. The efforts of DG ENV., on the other hand, did not satisfy the NGOs. These efforts were usually disorganised, last-minute, without clear agenda-setting and lack leadership. For the Marine Directive, the new proposal was poor in terms of wasteful and destructive fishing and implementation of Natura 2000 offshore sites. An action plan for shark and bluefin tuna conservation failed because of the economic interests of three EU countries. Even so, in 2009, some valuable first proposals had been tabled to reform the Common Fisheries Policy (Green 10, 2009a).

In this regard, first of all, Green 10 recommended that the EU should suggest new environmental laws “to require all timber and timber products in the EU to come only from legal sources and responsibly-managed forests”. The new legality definition should lead to ecologically and socially-beneficial forestry and governance (Green 10, 2009b). Secondly, the 2010 Biodiversity Targets, the CBD Programme of Work on Forest Biodiversity and Protected Areas and Biodiversity Communication and Action Plan which promotes the halting of biodiversity loss and integrating biodiversity into other policy sectors should be seriously implemented. Thirdly, the Commission must organise the committees better to deal with Member States for financing Natura 2000 and LIFE+ programme. Also the financing of the Birds/Habitats, Water Framework and Marine and Environmental Impact Assessment Directive should be enhanced. Fourthly, the link between conservation of biodiversity and prosperity of EU citizens’ should be promoted to reflect the reality that biodiversity loss is as important as climate change. A new post-2010 strategy with ambitious 2020 targets on protection and restoration of biodiversity and climate change objectives should be implemented. Lastly, a new legislation on invasive alien species and soils should be introduced.

In the beginning of 2010, the new 2020 Biodiversity Strategy with a new 2050 vision had been proposed by the Commission. It involved new targets to prevent the loss of biodiversity and ecosystem services. However, it was

significantly problematic, because it had been watered down under pressure from industry interests. Next, the strategy did not cover detailed targets on agriculture and fisheries which were critically important to halt biodiversity loss. Additionally, nature protection funding in Europe could not take a significant increase in the EU budget for 2014-2020. As a positive step, the Commission was working on a study to assess the relation between the EU consumption and global deforestation (Green 10, 2012b).

Green 10 had recommendations to develop positive impact on the legislation. To begin, it argued that sufficient funding for nature and biodiversity conservation in the new EU budget should be ensured in particular through the allocation of 1% of the budget to the LIFE fund (Green 10, 2012b). After that, the Biodiversity Strategy should be implemented and more effective actions should be proposed when it is reviewed in 2014, especially with respect to the protection of species and habitats, ecosystem services and measures related to the greening of agriculture. Then, as mentioned in the previous term, Green 10 put that the importance of a new and effective directive on invasive alien species should be drafted, while the Birds and Habitats Directive should be strengthened in terms of its implementation (Green 10, 2014b). Moreover, an effective action plan to halt deforestation should be presented by 2020 and a proposal with ambitious objectives to safeguard Europe's waters should be ensured. Lastly, innovations should be encouraged in the benefits of the environment despite the business domination (Green 10, 2016).

After these recommendations, there had been several positive steps in that period in terms of enhancement of nature and biodiversity in the EU for 2014-2019 period. First of all, as Green 10 recommended, the new regulation had been ensured to prevent the introduction and spread of invasive alien species by the Commission in 2014 with an expanded list of species and more strict rules (European Parliament & Council of the European Union, 2014b). Later, the enhanced Biodiversity strategy for 2020 had been adapted with six priority targets which are including the better implementation of the Birds and Habitat Directives and enhancing ecosystems especially forest and marine (European

Union, 2015). Finally, the budget of the LIFE Programme which funds the environmental projects had been increased to EUR 3,4 Billion that equals to the nearly 2 percent of the EU total budget for the period of 2014-2020 (European Commission, n.d.-k).

#### 4.2.2.3. Pollution and Resource Management

There was a lack of ambition to prepare effective new instruments to tackle water problems in the beginning of 1990s. According to the waste strategy that was revised in 1996, there were two key elements; first was “the priority of reuse and recycling over incineration and the second was the producer's responsibility” (European Commission, 1996). However, the revision of packaging directive which demanded by the industry allowed producers to increase packaging waste and absolve them of any responsibility for the waste. Furthermore, the legislation saw wastes as a renewable energy source which discourages waste minimisation and material recycling. While doing that, the provisions for biodegradable waste and composting issues were delayed progressively (Green 8, 2002).

On the other hand, the management of high-level radioactive waste was a problematic issue. According to the draft Directive on Waste Management, a deep geological disposal for radioactive waste presented as the only option and export of the radioactive waste to other Member States, or to the outside the EU would be allowed (Green 8, Micciche, & Riss, 2003).

During that period several positive steps had been taken. First of all, a directive on End of Life Vehicles (ELV) allowed consumers “to return their vehicles free of cost at the end of their life span”. The Directive promoted re-use, recycling and other forms of recovery of end-of-life vehicles and their components, with a view to reducing waste disposal (European Parliament & Council of the European Union, 2000b). Additionally, a directive on Waste Electrical and

Electronic Equipment (WEEE) and a proposal for a Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) had been adopted “which makes the producers responsible for taking back and recycling electrical and electronic equipment free of charge” (European Parliament & Council of the European Union, 2003). The both of them were good proposals because they stressed the priority of reuse and recycling and made the producer responsible for the waste.

Furthermore, several directives “on setting target levels for ozone, national emission ceilings and emission standards for power stations, as well as a proposal to reduce sulphur levels in petrol and diesel had been adopted”. A new programme 'Clean Air For Europe (CAFE) had been set up to address remaining air pollution problems (European Commission, n.d.-I). In October 2000, the Water Framework Directive had been adopted that promotes sustainable water use and establishes high quality objectives to be met for both surface water and groundwater by 2015 (European Parliament & Council of the European Union, 2000a). It was a good proposal for introduction of holistic water management to promote sustainable water use and obligation for Member States to achieve good status for all European waters by 2015.

While the policy developments had been shaped like that before 2003, Green 10 had recommendations on pollution and resource management. It argued that concrete objectives to tackle wastes and increase reuse/recycling should be defined and implemented. Similarly, the delayed directives on biodegradable waste and PVC waste should be proposed and adopted immediately. Although the Water Framework Directive had positive aspects, several problems remained in the directive. To begin, it was a complex text with ambiguous wording that resulted with legal uncertainties. Then, the directive did not have common standards to guarantee harmonisation of its implementation among all Member States. Finally, a list of 33 priority substances had been established but the hazardous substances that need to be phased out could not clearly be identified. To ensure its proper implementation, the technical capacity of both

the Commission and Member States should be increased (Green 8, Micciche, & Riss, 2003).

In terms of the radioactive wastes, Green 10 recommended that the draft directive on radioactive waste management should be revised dramatically by ensuring the waste management in the least environmentally damaging option, removing the option of exporting nuclear wastes to other countries and banning the reprocessing of nuclear fuel which increases the volume of radioactive waste. For the indoor air quality, a Green Paper recommended to control the indoor air pollution from tobacco products (Green 8, 2006). Additionally, Sustainable Consumption & Production Action Plan (SCPAP) which links production behaviour to consumer behaviour to understand the social and environmental causes of consumerization should be finalised by late 2007. The Action Plan should involve clear legislation on ecological product design with support of 6EAP's objectives (Green 10, 2009a).

In the period of 2004 and 2009, two thematic strategies had been drawn which were the sustainable use and management of natural resources and the waste prevention and recycling in the frame of the Sixth Environmental Action Programme's (6EAP). In late 2005, these two strategies were finally published, with a proposal for a revised Framework Waste Directive (FWD) and the Thematic Strategy on the Sustainable Use of Natural Resources (TSSUNR) (European Commission, 2005). They set out a 25-year vision to reduce environmental impacts of using natural resources and to improve resource efficiency. However, the high ambitions of the proposal disappointed most stakeholders (Green 10, 2007a).

Again, an Action Plan on Sustainable Consumption & Production and Sustainable Industrial Policy in 2008 adopted to make Europe 'resource-efficient'. It was one of the first action plans of its kind but the objectives did not even extend the Energy-Using Products Directive to include natural resources into eco design considerations (European Commission, 2008a). Several other

papers on resource efficiency, like the Raw Materials Initiative and the revised Waste Framework Directive had been adopted but could not be more than non-functional. Lastly, the Commission stubbornly refused to produce a draft Biowaste Directive which had been talking for the years.

In terms of air quality, a set of standards had been proposed by the Commission which were lower than those recommended by the World Health Organisation for ultra fine particles. In 2005, the Green 10 had raised questions about the reasons for removal of air quality strategies from the agenda, after the letter of the employer's federation UNICE to the Commission. However, no concrete development on this issue had been made (Green 10, 2005a). Moreover, the revision of the National Emission Ceilings Directive put on hold for an undetermined period.

For the post-2009 period, Green 10 had shared its recommendations on several issues. First of all, it argued that the main areas for Commission action were the overall approach on waste in the context of 'better regulation' and worked on 'Beyond GDP' better to reflect the loss and degradation of natural resources. However, better regulation on waste has brought proposals to use minimum standards and quality criteria instead of laws. Secondly, it recommended that environmental objectives on recycling, reuse and waste prevention should be harmonised in all Member States and measurable targets should be designated to assess performance. Additionally, a draft Biowaste Directive should be proposed without further delay. Thirdly, the current Raw Materials Initiative should be abandoned to prevent easier access to domestic and international supplies for European companies instead of sustainability. Besides, a High-Level Forum should be launched with participation of senior member state officials and stakeholders, as stated in the 2005 Resource Strategy. In terms of the Water Framework Directive, Green 10 recommended that the Directive should be revised with new strong targets to reduce water consumption, as well as standards for water use in products and buildings. Fourthly, the plan to withdraw and retable the key proposals on waste management and circular

economy should be cancelled (Green 10, 2014c). Moreover, the future of the air package should be disambiguated (Green 10, 2014d). With regards to emissions, they should be reduced as 84% for SO<sub>2</sub>, 55% for NO<sub>x</sub>, 29% for NH<sub>3</sub> and 60% for VOC compared to 1990 levels by 2010, while the 80% reduction of PM 2.5 should be ensured by 2010 (Green 10, 2016). Lastly, the noise levels and traffic accidents should be reduced by 50% by 2010 compared to the year 2000 according to Green 10's recommendations (Green 10, 2016).

In the next 10 years, for the 2009-2019 period, there had been several policy developments in terms of the pollution and resource management. The Water Framework Directive had been revised in 2012 and 2015, but it mainly focused on the river basins and sustainable management of the water resources without significant enhancements on the water consumption in production and buildings (European Commission, 2017b). Similarly, the biowaste issue had been included to the Waste Framework Directive, while the Green 10 recommended an individual and comprehensive one apart from the Waste Framework Directive (European Parliament & Council of the European Union, 2008). In terms of the emission reduction targets, recommendations of Green 10 were not achieved by the Commission, unlike there had been a slight increase in the emissions (Amann, 2018).

#### 4.2.2.4. Chemicals

According to Green 10's evaluation, the overall performance on the chemical policy was weak for the Commission between 1999 and 2003. The proposal "to ban phthalate plasticisers in (PVC) children's toys is far too limited in scope and addresses teething toys only". Additionally the implementation of the Substitute Principle failed and the work on hormone disrupting substances was weak. The risk assessment for Cadmium, one of the best known hazardous chemicals, had already taken more than six years and has delayed effective legislation (Green 8, 2002).

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation, which propose a new chemical policy, originally proposed in a White Paper in 2001, had been delayed for years. It was one of the first mechanisms in EU history to introduce the duty to substitute unacceptable, hazardous chemicals with less or non-hazardous alternatives. Heads of State and Government asked for the new chemicals legislation to be in place by 2004. However, the negotiations among the Commission caused further delay and weakened the provisions (Green 8, Micciche, & Riss, 2003).

In that context, Green 10 recommended that the Commission should be given priority to ensure the reform made in 2003 by rejecting industry's attempts to further dilute the text or to delay the adoption of the proposal. For the hazardous chemicals, the current draft provisions should be amended to implement the substitution principle. Furthermore, the consumption of harmful chemicals should be reduced 50% by 2010 compared to 1995, while all human-made releases of harmful chemicals should be eliminated by 2020 (Green 10, 2006a).

As Green 10 strongly pressured, the REACH regulation, after several major deletes and dilutions on the original proposal, came into effect on 1 June 2007 (European Commission, 2019b). During the negotiations, the Commission rejected many amendments that would have strengthened innovation, and health and environmental protection, while agreeing to weaken safety data requirements. On the other hand, in 2005, the Commission took over implementation of the EU Action Plan on Environment & Health 2004-2010 (European Commission, 2006a). However, the action plan failed to progress in revising risk-reduction strategies linked to current environmental policies on the priority diseases and revision of air quality and pesticides laws (Green 10, 2007a). On the other hand, the proposals to limit the transport related emissions and chemicals could not be effective because of late action. While the EURO 5 proposal for cars and light-duty vehicles was delayed, the proposal to limit emissions from heavy-duty vehicles and shipping was yet to be proposed.



On that basis, there were several recommendations of Green 10 for the post-2009 period. First of all, it argued that many key decisions like reviews of substances currently exempted from registration, Chemical Safety Reports and safety thresholds for hazardous chemicals, and the criteria to identify persistent & bioaccumulative chemicals were postponed until future REACH reviews. During that period, the Commission ensured the effectiveness of the REACH and the independence of the European Chemical Agency. Then, the Agency should be tasked with making dossiers for hazardous substances to be included in the 'candidate list' (Green 10, 2009a). In the second place, for implementation of the first cycle of the EU Action on Environment and Health, information capacity on impacts of environmental pollution on public health should be increased and better risk assessment regimes should be developed with a clear vision of post-2010. Vulnerable groups, particularly children, should be taken greater political and financial support from the Action. Finally, WHO Air Quality Guidelines should strictly be followed as a basis for relevant EU proposals and negotiations to reduce pollution at source for 2020, while National Emissions Ceilings Directive strengthened, according to Green 10's recommendations.

In the following years, the EU gained more scientific information on hormone-disrupting chemicals which means an effective REACH chemicals laws to protect human health and the environment. However, the objective of the REACH to phase out the most dangerous chemicals was slow. The Commission could not produce a roadmap to identify the most harmful substances. Additionally, the Commission systematically slowed down progress on assessing the risks of nanomaterials which were the microscopic particles with potential risks for health and the environment, while a few member states and the European Parliament had been driving the process. Similarly, the phase out process for the dangerous substances in terms of the Water Framework Directive had failed to prevent pollution at source (Green 10, 2012b).

Within this context, Green 10 recommended that hazard-based endocrine disruptors (EDC) strategy should be established to identify and reduce multiple exposures of EDCs, as required by the Pesticides and Biocides Regulations (Green 10, 2017b). Additionally, the announced post-2012 roadmap for REACH should be proposed to phase out the most harmful substances as well as to address possible risks from nanomaterials by 2020. In terms of the Water Framework Directive, the phase-out timetables for all priority water pollutants should be revised and proposed. Lastly, the deadlines of the 7th EAP should be respected to develop an united strategy for an non-toxic environment by 2018 (Green 10, 2019). The political developments had parallels with the recommendations of Green 10 in the post-2014 period. In terms of the EDC strategy, two new legislations had been adopted in 2018 to establish the scientific criterias to define EDCs and create a framework for the future (Dinu, 2019). Additionally, a public consultation had been carried out for the review of the REACH in 2017 (European Commission, 2019c).

#### 4.2.2.5. Energy

There had been several important steps by the Commission in terms of energy resources, renewable energy and energy efficiency in the beginning of the century. The energy efficiency of buildings became an important issue and in 2002, two separate directives merged in the name of 'Directive on Electrical and Electronic Equipment and the Directive on the Minimum Efficiency Requirements for End-Use Equipment'. However, this caused a delay in the phase out of the least energy efficient products. It also made "the process slow on the revision of the existing Directive on Energy Labelling" (Green 8, Micciche, & Riss, 2003).

Green 10 evaluated that the Commission could not be politically effective enough to ensure the environmental tax reform for environmental tax harmonisation on energy products. Additionally, the national fossil fuel subsidies

became an important unresolved issue. The resistance of the Member States, especially from Germany surrendered the Commission to make a convincing action to deal with the problem (Green 8, 2002).

As energy sources, the Commission announced that all hydrogen should be produced by renewable energy sources by 2050. For nuclear energy, on the other hand, long and complex discussions are obtained. In the Member States of the EU, there were three countries which were Finland, UK and France had plans for new nuclear capacity building. However, the nuclear power needs state aid and EU subsidies for nuclear were higher than for those alternative energy sources. Problematic part was the attitude of Commissioners on promoting nuclear power by showing the 'safety' reason and the responsibility transfer of nuclear issue from the DG Environment to DG Transport and Energy.

In 2002, a proposal had been presented to increase the limits of loans to the nuclear industry under the Euratom Treaty and three more directives presented on safety, measures on decommissioning funds, and requirements for radioactive waste dumping. However, this proposal was designed to ensure the survival of the nuclear industry, rather than to protect the public or the environment, according to the Green 10 review. It allowed energy companies to manage decommissioning funds under unspecified 'exceptional circumstances' and remove the requirement for surprise inspections at nuclear sites. Additionally, under the Euratom Treaty, more than EUR 3 billion in loans for reactors that were under construction.

For the post-2003 period, Green 10 had comprehensive policy recommendations on the energy issue. In the first place, Green 10 stated that a long-term and comprehensive proposal with priorities and mandatory targets to reduce energy demand, increase energy conservation and efficiency should be prepared by the Commission. Additionally, Green 10 recommended that the Directive on Eco-Design should be restructured to increase effectiveness in terms of minimum energy efficiency standards of products. Both directives

should include provisions for public procurement of energy efficient products. Secondly, the existing labelling system for the A-G energy efficiency should be extended to cover all energy consuming products. Furthermore, the Housing Directive for the insulation standards of walls, roof and windows should be revised to minimise the energy consumption.

For the alternative fuels, the Commission had made a proposal only on biofuel without examining options like natural gas and hydrogen. This was a positive approach and ensured the CO<sub>2</sub> emission reductions according to Green 10. However, some NGOs argued that the investment on the biofuel could cause a major boost in the production of farmed crops and foreseeable negative impacts on the environment. In terms of hydrogen policy, the commitment to achieve 100% green hydrogen by 2050 should be integrated into all hydrogen and fuel cell sectors. Later, the draft directive on nuclear energy should be revised or rejected to ensure an increase in safety standards of nuclear facilities. Additionally, the Euratom loans should not be used to fund more construction and expansion of nuclear plants, instead of the development of a sustainable energy system and energy efficiency. In the Bonn Renewables Conference in June 2004, the EU should ensure that conference congruently adopt a calendar for ambitious renewable energy targets and commit to remove the market barriers to renewable energy sources. Hydroelectric dams, unsustainable polluting biomass and waste incineration should be excluded from the definition of renewable energy sources. Lastly, the outdated Euratom Nuclear Treaty should be demolished (Green 9, 2005b).

On this basis, the integrated climate and energy package was an important initiative in terms of climate protection and renewable energy source as well as energy efficiency in the period of 2004 and 2009. A long-term binding target of a 20% reduction in energy consumption by 2020 had been adopted in the Energy Efficiency Action Plan in 2006, despite its insufficient objectives in the transport sector (European Commission, 2008b). Another Directive on Energy-using Products was adopted in 2005, but the implementation details could be decided

in technical working groups (European Parliament & Council of the European Union, 2005).

Regarding renewable energy, a legally binding follow-up target for the existing general and sectoral electricity target was needed to ensure long-term support and investment security. Additionally, a directive “to support the development of renewable energy in the heating and cooling sector which had been promised since 2001”, was urgently required according to Green 10’s evaluation (Green 9, 2005b).

The Commission had not proposed cutting subsidies and state aid to nuclear energy and fossil fuel-based technologies for a long time. It had failed to make any statement on the future of coal state aid. In terms of nuclear, a poor proposal had been made to limit state aid in the nuclear sector through the adoption of non-binding guidelines on funds for reactor decommissioning and radioactive waste management (Green 10, 2007a).

So, there were recommendations of Green 10 to improve the energy legislation for the post-2009 period. Initially, Green 10 recommended that a strong Energy Efficiency Action Plan with binding targets should be proposed to strengthen the existing legislation on energy efficiency and renewables as well as emissions reductions to meet the new climate action targets. More rigorous efficiency standards should be established and the Energy-Using Products Directive should be implemented effectively to reach a %20 energy savings target. Relatedly, Energy Performance of Buildings Directive should be extended and specific policies are urgently needed to promote renewables sources in electricity and heating and cooling systems. The total reduction should be at least 460 million tonnes of CO<sub>2</sub> per year, or 10% of EU CO<sub>2</sub> emissions (Green 10, 2008). Secondly, to share the efforts fairly among Member States, the Commission should propose a plan to meet binding energy targets for the GHGs emissions reductions. In terms of biofuels, strict environmental and social safeguards should be ensured. Thirdly, a phase-out plan should be

implemented for all subsidies of fossil-fuel based technologies, especially coal, and nuclear by 2010. Lastly, the financial support should shift to renewable energy investments, when the nuclear safety levels should increase for the extension of the reactor's life-time. For the newly built reactors, The Best Available Technology and Best Regulatory Practice should be implemented.

For the 2010-2014 period, as positive steps, in the implementation of existing 2020 EU energy policies showed progress by proposing a new Energy Efficiency Directive. Thereafter, the energy companies needed to deliver annual energy savings, but it did not include binding national targets that the EU had already committed to (Green 10, 2012b).

In the frame of Energy Roadmap for 2050, the Commission began to consider its post-2020 energy strategy and opened the debate on long-term renewable energy targets beyond 2020 (European Union, 2012b). However, the use of bioenergy overemphasized in comparison with other renewables and the safeguards were missing for implementation.

The proposal on the Energy Tax Directive was a good step to put higher taxes on diesel fuels. However, it did not ensure an obsolete ban for aviation and maritime fuel taxation. In terms of the fuel quality, the dirtiest transport fuels like tar sands and shale oil had been strongly discouraged for all oil companies by the Fuel Quality Directive. But again, it did not include incentives to improve the energy efficiency of oil extraction or refining methods. In terms of nuclear, after the Fukushima nuclear accident, a quick and good action had been initiated for nuclear stress tests, except the test criteria were subsequently diluted by governments (Green 10, 2012b).

For the following years, Green 10 recommended that a binding renewable energy and energy efficiency targets for 2030 with clear limits to use of bioenergy should be proposed before the 2014 EP elections (Green 10, 2013). The Ecodesign and Energy Labelling Directives should be revised and emission

reduction incentives for fossil-fuel based energy companies should be proposed. Additionally, the Commission should put pressure on European Investment Bank (EIB) to end lending to fossil fuel based projects. Lastly, electricity market rules should be updated for the integration of renewable power.

In the last 5 years, the Energy Labelling issue had been updated from Directive to Regulation in 2017. In that context, the ecodesign and energy labelling requirements for the household refrigerators, electronic displays and light sources had been revised in 2019 (European Parliament & Council of the European Union, 2017). The recommendation of Green 10 on the EIB's funding on fossil fuel energy projects did not follow out. The EIB funded EUR 13,4 Billion between 2013 and 2019 (BBC, 2019). However, at the end of 2019, the EIB announced that the financing for fossil fuel energy projects will be ended from the end of 2021 and the funds will be allocated for climate action and environmental investments (European Investment Bank, 2019).

#### 4.2.2.6. Transport

In the beginning of the 2000s, the general focus on the transport sector was the liberalisation and the environment could not take enough priority. Sustainability targets for the transport policy and the commitments that were adopted in 2001 with the White Paper on the Common Transport Policy failed (Green 8, 2002). The improvement of the air and rail transport were main focuses of the Commission. A legislative package on air traffic management as “the Single European Sky” and a proposal for the improvement of the European rail network for international good transport were the significant steps for transport (European Commission, 2018b).

According to Green 10, the overall performance did not well to ensure transparency and environmental considerations, although the transport was one

of four priorities in 2001. Additionally, the programme on the regulation of transport prices had been postponed, even if it was a proposed framework in the Commission's 2003 work plan (Green 8, Micciche, & Riss, 2003). So Green 10 recommended that a comprehensive proposal should be prepared with strong environmental targets for transport with involvement of all stakeholders, including ENGOs. In terms of the air transportation, the Single European Sky proposal which developed the management of air traffic was a good initiative to reduce flight delays. However, it was not an effective instrument to reduce air traffic emissions which includes GHGs, air pollutants as well as noise pollution. According to the railway reform package in 1991, the reform of the rails sector was an important priority to lead sustainable road transport patterns. However, the liberalisation of the sector was not an effective instrument to achieve this priority while its environment impacts and economic inefficiency on the stage. Eurovignette Directive should be revised to differentiate the road pricing according to environmental performance. The revenue should be used for environmentally and socially value added purposes like public transport and hospitals.

In the next 5 years, between 2004 and 2009, transport sector could not take enough attention from the Commission. The actions were poor without environmental benefits and with contradicted objectives to Sustainable Development Strategy (Green 8, 2004a). The Eurovignette Directive which proposed earlier for road pricing according to environmental performance had been pending in the Council, although the Green 10's recommendation. On the other hand, a new proposal on airport charges to prevent over-pricing by airports had been proposed but postponed indefinitely.

On the positive side, the budget for Trans-European Networks was doubled to EUR 8 billion with new communication by 2008 (European Parliament, 2020a). However, the environmental and social assessments for the new projects could not become a criteria for the funding. Moreover, the new Cohesion Fund Regulation had been adopted for the development of clean urban transport, but



the Member States had been allowed to allocate just 10% of their transport spending to this objective (Green 10, 2007a).

In 2007, Green 10 sent an open letter to the Commission by demanding to announce binding CO<sub>2</sub> emission legislation for the 120 g/km target on new passenger cars (Green 10, 2007b). However, one of the oldest EU climate targets had been increased from 120 to 130 g/km by 2012 while the voluntary approach to tackling CO<sub>2</sub> from new cars is failing (European Commission, 2017c). Conversely, a new climate target for transport fuels had been adopted with a 10% reduction of 'well-to-wheel' greenhouse gas emissions per unit of energy by 2020.

Apart from that, there were recommendations of Green 10 for post-2009 period. First of all, it stated that a revised transport policy should be adopted to make Europe the most transport-efficient economy with a clear target to reduce GHGs emissions from the transport sector by 2020, as the overall commitment of the EU to reduce greenhouse gases by 20% by 2020. Additionally, a new Euro VI heavy-duty engine emissions standards should be proposed, while the new legislation to cut CO<sub>2</sub> emissions from new cars to 80 g/km to double their fuel efficiency by 2020. Fuel efficiency standards for vans, trucks, aircraft and ships should be assigned to ensure emission reduction from aviation and shipping. Relatedly, an EU kerosene tax under Enhanced Cooperation should be proposed by the Commission (Green 10, 2009a). Lastly, as witnessed in the case of the Rospuda Valley, stricter regulations should be adopted to prevent the infrastructure projects which cross nature areas.

In the beginning of 2011, a white paper had been proposed to set a target for a 60% reduction in GHGs emissions from the transport sector by 2050. However, the overall efforts focused on transport growth, instead of achieving emission targets. The CO<sub>2</sub> emissions from new cars had been set as 95 g/km for 2020, although the 80g/km recommendation of the Green 10. On the other hand, the efforts for heavy-vehicles had been delayed (International Council on Clean

Transportation, 2014). A good proposal had been drafted by the Commission to deal with high-carbon sources of transport fuel, but had been deadlocked on biofuels policy for years. For the infrastructure projects, a new cohesion proposal had been adopted for 2014-2020 with insufficient climate and energy targets (Green 10, 2012b). In terms of the aviation sector, Green 10 demanded to include the CO<sub>2</sub> emissions from European flights into the EU Emissions Trading System in its open letter in 2005 (Green 10, 2005b). After 7 years of negotiations, the proposal had been adopted officially in 2012 to monitor, report and verify all emissions of the aviation sector (European Commission, 2017d).

For post-2014 period, Green 10 strongly emphasized the CO<sub>2</sub> emissions targets for new cars and vans. It recommended that the targets should be revised as 80 g/km for 2020 and 60 g/km for 2025 (Green 10, 2009b). Additionally, CO<sub>2</sub> labelling directive should be updated with more effective targets for more efficient vehicles according to Green 10's recommendations. A set of measures to reduce the climate impact and efficiency of shipping and trucking and a new method for the infrastructure projects to compare climate and environmental impacts of the projects were on the recommendations. Although these recommendations, between 2014 and 2019, the CO<sub>2</sub> emission targets from new cars did not revised but applied until 2020 as as 95 g/km (European Commission, 2017a). Additionally, the strategy to reduce emissions from shipping and trucking did not updated after 2013.

#### 4.2.2.7. Maritime Affairs and Fisheries

Common Fisheries Policy with binding principles on sustainable use and the protection of the marine environment had been proposed by the Commission in the beginning of the 2000s. The policy included the fleet capacity reduction in Member States and provided compensation for those fishermen who choose to scrap their vessels and leave the industry (European Parliament, 2019).

The major maritime accidents such as “Erika” and “Prestige” were the driving force of the Commission to propose legislation to anticipate the deadlines for the definitive removal of single-hull oil tankers. Additionally, a proposal that offered criminal sanctions for oil spill accidents had been proposed in 2003. However, it was an issue of concern that these initiatives will be forgotten when outrage of the accidents fades away (Green 8, Micciche, & Riss, 2003).

Green 10, on the other hand, underlined the importance of preventive approach to the environmental impacts of the shipping industry. According to recommendations, this approach should ensure internalisation through differentiated charging and that polluters pay principle for the full range of damage which they cause. Additionally, the existing legislation on the international liability and compensation system under the International Maritime Organization (IMO) should be expanded to cover the cargo owners, not just the ship owners. The Commission should propose an EU liability regime for both traditional damage and environmental damage. For the case of accidents, the “fault” definition under the International Convention on Civil Liability for Oil Pollution Damage (mostly known as CLC Convention) which should be amended from “criminal intent” to stronger definition.

In the period of 2004 and 2009, Common Fisheries Policy reformed with more sustainable environmental targets. The policy adopted the vision that emphasises the importance of biodiversity and the safe, clean, healthy and productive oceans and seas. Additionally, Marine Strategy Directive and Maritime Policy implemented with the significant performance of the Commission. However, the proposals had been inadequate in terms of clear objectives and the liability for the implementation which could cause more conflict between industry and ecosystems. The failed fishing policy that actually aims to protect fish stocks and their habitat was an important example for this foreseeable future (Green 8, 2007a).

In that term, Green 10 recommended that a comprehensive and effective EU wide system should be adopted to protect marine ecosystems and to remove human pressure like the successfully implemented Habitats and Birds Directive. Additionally, the commitments of the Marine Strategy Directive should be enhanced “to match the European Parliament’s ambitions for stringent marine protection during the Directive’s second reading”. In the second place, the EU should lead the international negotiations to protect the high seas and ban destructive fishing practices. In particular, the Commission should have worked with countries to identify pilot reserves on the high seas at the COP of the Convention on Biological Diversity in 2008. Lastly, a new action plan should be adopted to reduce the incidental bycatch of seabirds, marine creatures, while the measures should be strengthened “to recover the fish stocks by building on the precautionary principle and integrating adaptation strategies” (Green 10, 2009a).

In 2011, a new Common Fisheries Policy (CFP) was promulgated by the Commission after long-runned public consultations and negotiations. However, the policy lacks clarity and involves inadequate targets on stock and fleet management as well as fishing quota allocations and subsidies (European Commission, 2016c). On the other hand, the Commission’s efforts to confront and eliminate illegal, unregulated and unreported (IUU) fishing resulted in positive ways, while the deep-sea fishing and seabird by-catch issues were still lacking action. Green 10 recommended that a reformist proposal to secure sustainability objectives and sustain environmentally-friendly fishing practice should be adopted with the support of the Council and Parliament. Additionally, international leading of the EU should be strengthened by improving the capacity of EU fisheries agreements. In terms of the funding, European Maritime and Fisheries Fund should be greener to support ecosystem-based approaches on fisheries management according to Green 10’s recommendations.

On this basis, the Regulation on the European Maritime and Fisheries Fund had been accepted for the 2014-2020 period in 2014. Totally EUR 6.5 billion had been allocated for the fund. The rebuilding fish stocks through eliminating the pollution at sea was the one of priority of the legislation (European Parliament & Council of the European Union, 2014c). However, on the contrary to the Green 10's recommendation for a greener approach, the Regulation did not involve a comprehensive environmental assessment and priorities on maritime and fisheries.

#### 4.2.2.8. Food Safety

According to Green 10, there had been several positive and negative developments for food safety, especially for the GMOs (Genetically Modified Organisms) in the period between 1999 and 2003. As positive steps, three important legislations came into force which were the directive on deliberate releases of GMOs into the environment, GM Food and Feed Regulation and Regulation on Traceability and Labelling of GMOs. The legislation was completed due to political pressure by Member States and strong public concern, despite the GMOs promotion attempts of some Commissioners. Additionally, the legally binding limits to dioxin contamination for food and feed were important steps to exclude GMOs from the food and feed chain (Green 8, 2002).

On the other hand, some developments made the commitments on food safety weaker and reflected negatively. Firstly, the demanded proposal of the Parliament on the liability for GMO contamination "to address the issue of preventive measures and related costs to avoid contamination had been refused by the Commission". Secondly, there had been an insistence of the Commission "to lift the de facto moratorium on new GMO approvals that rises for concern for the potential environmental and health impacts of GMOs". Finally, the report on 'coexistence' of GM and non GM farming which was

released by the EU Joint Research Centre had been kept secret for five months by the Commission services. It became publicly available after Greenpeace had leaked parts of it to the press (Green 8, Micciche, & Riss, 2003).

For better food safety policies, Green 10 recommended that three new legislation should be proposed “to fill the gaps in the existing legislation on GMOs; a legislative framework to protect consumers and farmers from genetic contamination, a proposal to address liability for economic damage in case contamination of conventional and organic crops and products and a ‘Seed Directive’ to set up a general standard of adventitious contamination of conventional seeds no higher than detection level (0,1%) for all crops” (Green 8, 2003c). Besides, new approvals for releases of GMOs into the environment should be avoided by the Commission and the VAT rates for the organic food products should be reduced while ensuring that 10% of the EU area is farmed organically by 2006 (Green 8, 2003c).

In the beginning of 2004, the implementation of existing EU legislation on GMOs was problematic. The Commission had shown little attention to ensure the implementation, while trying to allow new GM products onto the EU market. In terms of the European wide implementation, the responsibility of co-existence and liability had been transferred to the Member States by adopting a ‘wait-and-contaminate’ approach which allows GM contamination to harm biodiversity. Additionally, European Food Safety Authority had failed to conduct long-term evaluations of GMOs, despite EU countries’ scientific objections of the Member States on the issue (Green 10, 2007a).

For the pesticides, new criterias to eliminate pesticides on the market had been proposed by the Commission, even if it failed to ban other dangerous substances like those that harm the development of children’s brains (European Commission, 2007b).

In the international area, the quick actions had been taken for the imported foods with illegal and untested GM strains like the ban on rice from the US. However, for the internal market, the GM products were a major public issue. The new GM products were forced into the EU market, in spite of the widespread public opposition. Furthermore, no reaction had been taken for the food safety of GMO products already on the market. In that meaning, the legal framework for GMOs remains poorly implemented and incomplete to meet 2010 biodiversity targets (Green 10, 2009a).

For the post-2009 period, there were several recommendations of Green 10 on food safety issues. First of all, it argued that the existing legal framework on GMOs should be strengthened to prevent GMOs based damage on biodiversity and public health. Until the completion of this enhancement, all new imports and cultivation should be halted. Secondly, the Commission should ensure that the European Food Safety Authority (EFSA) respects strict standards of GMOs legislation. Thirdly, a new proposal should be presented on liability and contamination based on minimum detection levels as well as the transparency of the authorisation process to prevent further cases such as the EU Joint Research Centre report which leaked by Greenpeace. Fourthly, the agreement on the “Transatlantic Trade and Investment Partnership” which risks the environmental achievements of Europe in terms of mandatory labelling of ingredients and production methods should be revised (Green 10, 2014e). The negotiations should be paused for assessments and public consultations as well as for full parliamentary approval. Fifthly, EP should encourage the Commission to fulfil its role and to ensure the proper application of GMOs authorisation while limiting the companies and farmers using/producing GM crops (Green 10, 2009c). Lastly, the food waste should be cut off at least 50% before the 2014 EP elections, according to Green 10 (Green 10, 2013).

Although the Green 10’s stand against, the negotiations on the “Transatlantic Trade and Investment Partnership” had been carried out between 2013 and 2016. However, as the Green 10 shared its concerns, the negotiations ended in

2016 without any conclusion (European Commission, n.d.-g). On the other hand, the recommendation on the reduction of food waste was not achieved, while annual food waste still generates around 88 million tonnes (Stenmarck, Jensen, Quested, & Moates, 2016).

#### 4.2.2.9. Transparency

The Aarhus Convention which aims open access to information, public participation and access to justice in environmental matters had been signed by the European Community and all Member States by 1998 and came into force in 2001. However, because of the ratification process, the Convention could not fully adopt except two Directives on access to information and public participation. Besides, the adaptation of the convention met with resistance within the Commission, according to Green 10 because of the idea to sufficiency of existing "guiding principles and minimum criteria for consultation of interested parties" of to comply with the Aarhus Convention (United Nations, 1998). However, it was an issue of criticism because these guiding principles could only apply for the Commission, not for all EU institutions and did not establish a legal right of public participation (Green 8, Micciche, & Riss, 2003).

Green 10, on this basis, recommended that more legislative proposals should be presented to include public participation as a legal right at the EU level in the frame of Aarhus Convention. Likewise, a common system for the registration of lobbyists and the organisations should be launched to regulate the relations between the Commission and lobbyists (Green 10, 2006b).

After years of effort of Green 10, in terms of the compliance of the Aarhus Convention, "The European Transparency Initiative" had been launched in 2005 "with a lobby register, more disclosure about the use of EU funds and a review of the rules of public access to EU documents" (European Commission, 2007c). In 2008, further steps were taken "to urge lobby organisations to disclose



information about the interests they represent and the source of their funding”. However, the voluntary nature and the binding gaps of the system had been criticized for no real benefit for increasing transparency in EU Lobbying (Green 10, 2007a).

Similarly, the Commission had adopted a Regulation requiring member states to publish the recipients of EU agriculture and regional development subsidies. On the other hand, Access to Documents Regulation had been proposed that would further limit access to documents that play an important role in policy preparation.

Even if the transparency initiative launched, Green 10 strongly underlined the gap on its voluntary basis. In that term, first of all, it recommended that lobby register systems should be mandatory with a full list of lobbyists’ names and accurate data on lobbying expenditures. Then, it argued that more documents including infringement cases, agricultural, regional development, structural and cohesion project subsidies should open to access (Green 10, 2006c). After that, a new initiative that allows NGOs to access the European Court should be created. Finally, the Access to Documents Regulation which was adopted in 2009 should be improved in cooperation with the European Ombudsman on transparency and access to documents.

As a result of the Green 10’s recommendations, the Transparency Register which is a joint Commission-Parliament lobby register system had been set up in 2011 without mandatory and high-quality reporting (European Parliament, 2014). In the following years, Green 10 continued strongly on its recommendation to make Transparency Register fully mandatory register for lobbyists by 2015 at the latest. Additionally, it argued that the Commission should block the relations between the EU institutions, including staff and corporate lobby firms to ensure transparency. Under the Aarhus Convention, the scope of the access to documents should be enlarged in particular on access to environmental information.

In 2016, some set of negotiations had been established to develop and make mandatory the Transparency Register in coordination of Vice President of the European Parliament and Chair of the Committee on Constitutional Affairs. However, after three years of negotiations, it could not be ensured the Transparency Register as a mandatory tool and it is still based on voluntary contribution (European Parliament, 2020b).

#### 4.2.2.10. Sustainable Development

In 2001, the Sustainable Development Strategy had been published after two years of preparation process with limited public consultations. Originally, the proposal advice had been made at the Helsinki Summit in 1999 to prepare a long-term strategy for economically, socially and ecologically sustainable development. According to the Strategy, four priority areas had been selected with implementation targets and timetables (European Commission, 2001). However, in the following years, the attitude of the EU policies shifted from the sustainable development objectives to the traditional pro-growth policy orientation (Green 8, 2004a).

On the other hand, environmental performance of the economies in the EU was an issue of discussion. In the Spring Report 2003, an overall environmental performance had been published without any initiatives and information “on decline of biodiversity, human exposure to chemicals, resource efficiency” (European Commission, 2003b). Additionally, during the European Convention Process, the integration of the environmental policy to the sustainable development strategy was another problematic issue. The wording of sustainable development had been proposed to change by removing environmental considerations. It was also including the environmental protection to the Convention’s definition of sustainable development (Green 8, 2003e).

In addition to all these, according to Green 10, the funding and technical assistance programmes for developing countries had lacked any serious environmental assessment for the extraction of natural resources and infrastructure projects. In the frame of the African Latin America funds (ALA) and European Development Fund (EDF), nearly EUR 5 billion had been transferred each year. Though, there had been poor consultation and coordination within the Commission as well as between the Commission's EuropeAid Cooperation Office and NGOs to create a common strategy for sustainable use of natural resources (Green 8, 2004a).

For the post-2003 period, Green 10 recommended that a comprehensive report should be produced by the Commission by 2004 to present the progress on halting the decline of biodiversity by 2010, trending the exposure of human bodies and nature to chemicals and the progress in decoupling waste production from economic growth. After that, the Commission should be focused on the conservation and management of natural resources on the EU's funding and technical assistance programmes for developing countries. The assessment strategies should clearly define the links between poverty, development and environment in coordination with environmental and development organisations in partner countries. Additionally, in terms of ALA Regulation, "a minimum of 10% of funds should be dedicated to the integration of environmental aspects in national or regional development policies" (Green 8, 2004a).

On this basis, the assessment report for the first Sustainable Development Strategy (SDS)'s success had been published, while the criticisms rose on its implementation in 2005. In terms of the Lisbon Strategy, the EU should implement the SDS in consideration of environmental priorities particularly climate-related issues. However, the implementation of both the Lisbon agenda and SDS had failed in practice (Green 10, 2006a).

In 2006, the EU Court of Auditors published an evaluation for the management of sustainable development policies which highlighted the lack of a coherent strategy, insufficient trained staff and monitoring systems as well as the poor assessment of environmental impacts. Following the year, although the EU named sustainability as the EU's five key values, there were limited references to deal with climate-related issues.

On the other hand, several positive steps had been taken during that period, according to Green 10's assessment. The European Consensus on Development which strengthened the sustainable development objectives while supporting the environmental protection for long-term poverty reduction had been accepted. The other major developments were a new Common Framework for Country Strategy Papers, guidelines for geographic programming of funding through country and regional strategy papers, the agreement to publish environmental profiles to help consultation with civil society on strategy papers and the Thematic Programme on environment and sustainable use of natural resources, including energy.

Despite the positive steps in the last years, Green 10 had further recommendations on sustainable development. First of all, it argued that the Lisbon Strategy and the Sustainable Development Strategies should be combined to create a 'green and social deal' that focus energy and resource efficiency, research and innovation, public procurement, energy, transport and agriculture. For this combination, the EU Development Report should be used as an instrument to analyse linkages between poverty and to propose new approaches to improve the environmental dimensions of development. Secondly, "Open Method of Coordination" should be promoted for environmental fiscal reform to balance labour costs and ecological price of products. Thirdly, the EU Water Initiative, The 2010 Biodiversity Action Plan and Rolling Work Programme for Policy Coherence for Development should be enhanced with new objectives on fisheries, trade, and climate change. Fourthly, the EU-Africa Infrastructure Partnership should be revised to support

environmental priorities of the local governments from the sustainability aspects. Lastly, the EU agenda should be focused on sustainable development while sustaining investment for the green and nature-based innovations as well as supporting environmental policy as a key tool for job creation (Green 10, 2014f).

On this basis, the Sustainable Development Strategy for 2020 had been adopted in a linkage with the international agenda without clear environmental objectives in 2010 (European Commission, 2019d). However, in 2016, after the UN's 2030 Agenda on 'Sustainable Development Goals', the key actions including "a healthy planet" objective had been merged with the existing legislation (European Commission, 2016d).

#### 4.2.2.11. Budget

The major development on the environmental aspect of the budget was the EU Structural and Cohesion Funds for the period of 2007-2013. It had been accepted after years of planning. According to the framework, total EUR 347 billion over the seven-year period had been designated to promote sustainable development objectives (European Commission, 2014). Afterward, the Community Strategic Guidelines (CSGs), which set common EU priorities on what should be financed had been adopted. In parallel, National Strategic Reference Frameworks (NSRFs) and Operational Programmes (OPs) had been prepared by the Member States to plan for the actual use of the funds.

On the other hand, the sustainability priorities of the cohesion policy had failed to promote environmental objectives. The growth and jobs were the main focus with limited investments (less than 3% of the regional funds) on energy efficiency, renewables and clean urban transport. Additionally, the other environmental issues like Natura 2000 and waste recycling were not prioritized

that receive less than 4% of the overall budget (Green 8, Micciche, & Riss, 2003).

In its position paper by 2005, Green 10 recommended several financial perspectives for the 2007-2013 budget period. First of all, it highlighted the importance of a greener and environmental budget with clear objectives and priorities. Secondly, it emphasised the need of funding support for the Natura 2000 network, Water Framework Directive, European Chemicals Agency and the new European Centre for Disease Prevention and Control. Thirdly, it argued that the funding for the LIFE+ programme should be increased from EUR 250 million to 580 million (Green 10, 2005c). Besides all, Green 10 demanded a more sustainable development strategy oriented EU budget and transparency and accountability on the funds in its 2008-2009 recommendations (Green 10, 2007c).

For the post-2009 period, Green 10 recommended that sufficient funds should be ensured for the environmental obligations of the Member States that includes the Natura 2000 and objectives on energy efficiency and renewables, ecosystem conservation, climate protection and resource efficiency. The overall budget should not be less than EUR 6.1 billion per year for Natura 2000 sites (Green 10, 2008). Additionally, the large-scale infrastructures to develop the public transport should be a priority of the cohesion policy instead of motorways. In terms of the MFF (Multiannual Financial Framework), 20% of MFF should be ensured for climate action and 1% of it for the LIFE funds (Green 9, 2005c). Lastly, to ensure the high transparency of the EU funds and spending, a monitoring and evaluation system should be developed (Green 10, n.d.-b).

In the previous period, between 1999 and 2009, the overall budget for the Natura 2000 sites was the EUR 6.1 billion which was also the Green 10's recommendation for the post-2009 period. However, the budget had been cutted and estimated as EU 5.8 billion per year for the period of 2014-2020

(European Commission, n.d.-k). On the other hand, as mentioned in the Nature and Biodiversity Protection section, the budget allocation for the LIFE funds had been increased to nearly 2 percent of overall budget.

#### 4.2.2.12. Environmental Liability

The proposal for a Directive on Environmental Liability was the main discussion in the beginning of the century. The text had been criticised widely in terms of its scope as well as the binding objectives (European Commission, 2013). The drafting text had been proposed after two years of progress without adequate consultation of ENGOs. On the negative side, the proposal had excluded oil transport by sea, nuclear industry as well as authorised GMOs. As a result, the system became a fault-based liability instead of strict liability which allows the option of permit-defence and disable the polluter pays-principle.

In that context, Green 10 recommended that the proposal should be updated “with strong the polluter-pays principle with no automatic exemptions and with a mandatory system of financial security” before the Parliament’s June 2004 elections. In terms of the corporate social responsibility (CSR), the companies’ “greenwash” activities should be prevented through creation of CSR framework (Green 8, 2004b).

In the period of 2004 and 2009, according to the EEB’s (The European Environmental Bureau) report, The Sixth Environmental Action Programme (6EAP) which came into force in 2002, had not achieved its objectives, especially those on the protection of biodiversity, transport and agriculture. It was even questionable whether they would be met by 2012. In 2008, the Commission published a new Communication on environmental law with modest proposals on environmental liability. However, it was a slow action to respond to complaints from the public (Green 10, 2007a).

On the other hand, there had been several positive developments. The number of staff in the Infringement Unit (which is responsible from the legal acts against the failures of Member States on implementation of the EU law) had been increased, although it was still problematic the handling of complaints and lacks transparency. Additionally, there was strong defence of the Commission on the draft Directive on Access to Justice against member state pressure, the Rospuda valley case from destruction and temporary ban to spring bird hunting in Malta. Besides all, the Commission started “to organise NGO meetings prior to member state discussions on pending complaint cases” (Green 10, 2009a).

According to Green 10's recommendations, the basic principles for environmental policies particularly the polluter pays, precautionary and preventive action should be reconfirmed for all environmental actions of the EU with legally-binding targets in the post-2009 period. Besides, implementation progress of the Member States should be monitored with revised measures to better implement EU environmental law, while the Directive on Environmental Crime needs to be updated for penalties.

The Resource Efficiency Roadmap had been proposed in 2011 “without a clear vision on how to improve Europe's use of resources, leaving most of the substance to future policy processes”. Furthermore, the other initiatives in that term were delayed or proposed with weak commitments. There had been no proposal for the 7th Environment Action Programme, while the discussions on 2014-2020 EU budget were close to complete. Similarly, the EU regional aid budget did not deliver sufficient budget for investments on biodiversity and natural resources (Green 10, 2012b). On this basis, Green 10 recommended that a new set of targets for resource use and reduction should be adopted for the post-2014 period. Also, a new proposal for the 7th Environment Action Programme should be delivered with strong environmental objectives. Lastly, the EU funds should be monitored and evaluated to ensure the resource efficiency and transparency, while access and consultation of the civil society improve according to Green 10.



In 2014, The 7th Environmental Action Programme came into force with three key objectives on “natural capital, resource-efficient low carbon economy and safeguard of the citizens from environment-related pressures” for the period of 2014-2020 (European Parliament & Council of the European Union, 2013c). However, there were debates on the programme to achieve its objectives until 2020 (European Parliament, 2018).

So far, the thesis has analysed and compared the documents to illustrate the interaction of the Green 10 with the EU environmental legislation. Each of the subjects which are in the frame of the environmental issues had been investigated in the comparison with the Green 10’s recommendations and its impacts on the developments of EU environmental policies. From nature and biodiversity conservation to transparency and from sustainable development to energy, Green 10 shared its views and aimed to create influence on decision makers.

It is clear that Green 10 had followed each of environmental issues closely, shared its recommendations and expertise through various ways including the consultation tool, meetings or expert groups. While the environmental policies of the EU were shaping, the Green 10 or its member ENGOs had been actively participated in the policy-making process. So, the Green 10 always became part of the decision-making on environmental issues as long as an issue had an environmental perspective.

In the first place, Green 10 shared its recommendations through its various documents including open letters, policy proposals and press statements in all major environmental issues. The member ENGOs fastly contributed to the public consultation and shared its expertise through expert groups of the Commission. From the most comprehensive issues such as Emission Reduction Strategy to the issue-focused issues such as the ClientEarth case, Green 10 has been actively sharing its views. Because each member organizations of Green 10 have different expertise, their impact grows parallely.

If we evaluate the 20 years of Green 10, there are wins and losses for each environmental subject. In terms of the climate change, Green 10 always pressured the EU to follow the commitments of Kyoto and Paris. Combating with illegal logging to prevent destruction of carbon sinks was an important success. Additionally, the intense lobbying to stop EIB's funding for fossil fuel projects and shift to climate action and environmental investments had been resulted successfully. However, the current situations do not promise hope to achieve 2020 GHG targets.

For the nature conservation and biodiversity, Natura 2000 and LIFE funds could not take significant rise, although Green 10's strong pressure. Even the Natura 2000 fund shrank. However, the regulation on the introduction and spread of invasive alien species had come into force after Green 10's long-run lobbying. In terms of the pollution and resource management, Green 10 contributed to the legislation on the indoor air quality from tobacco products, banning single use plastics and recycling. Similarly, on the chemicals issue, REACH regulation had been adopted after Green 10's pressure, but the regulation on the phase out of the most harmful substances still needs development.

Under the energy title, Green 10 played an important role to increase the rate of renewable energy and phase out from fossil fuels. However, nuclear energy is still an unsolved issue with on-going fundings. Adaptation of insulation standards, labelling systems and energy efficient products were significant successes that Green 10 actively contributed. In terms of transport, for a long-time, Green 10 advocated to change CO<sub>2</sub> limits for cars to the 80 g/km. However, the limits had been decided as 95 g/km and still in force. On the other hand, as a significant success, Green 10's recommendation to include aviation sourced CO<sub>2</sub> emission to the EU ETS had been adopted in 2012.

For the maritime affairs and fisheries, Green 10 had long-run pressure to ensure liability of accidents, but it was not adopted. Very relatedly, in terms of the environmental liability, the recommendation to adopt principles of 'polluter

pays, precautionary and preventive action' was not achieved. Similarly, Green 10's recommendations on protection of fish stocks, preventing deep-sea fishing and seabird by-catch issue did not result with satisfied outcomes. In terms of the food safety, there had been successes to control and eliminate the pesticides, but the food waste issue could not be solved.

In the meaning of transparency, 'The European Transparency Initiative' and then 'Transparency Register' were important developments after Green 10's recommendations. However, the system is still voluntary based instead of mandatory, although Green 10's strong pressure. For sustainable development, environmental concerns and climate-related issues could not get the attention that it deserves. They were not fully involved in sustainable development strategies with clear objectives. Lastly, in terms of the budget, the overall budget had been increased in energy efficiency, renewables, clean urban environment, nature protection and climate change, but it stayed below the recommendations and expectations of Green 10.

After that, since its creation in 1999, Green 10 has always become part of the process via its key features such as strength of information and number of members. Being an advocacy network and acting as a collective action strengthened its influence over decision-makers rather than acting individually. Especially the issues where its member ENGOs have expertise on it, the Green 10 use the strength of knowledge to create influence on the environmental legislation. Additionally, the political atmosphere of the EU and multi-level governance system, give space to the Green 10 and ENGOs to easily reflect their views and recommendations on environmental policies via the EU Consultations or expert groups.

Lastly, in terms of the financial dependency, the thesis evaluated that the more financial dependency of the organizations to the EU funds, makes them withdrawn and less critical against the EU environmental policy, while the

limited EU funds on the overall budget makes the ENGOs more pushing and critical.

In brief, it is possible to conclude that Green 10 was and is an important actor in the EU environmental policies. It actively participated in the policy-making process on environmental issues and gained significant wins. However, it is also necessary to evaluate that, as it could be understood from the documents that had been published and their number of meetings, especially after the 2014 with the Juncker Commission, the Green 10's activity is in a trend of decrease and there are less willing to participate to the policy-making process as the coalition.

## CONCLUSION

The thesis aimed to illustrate a picture for the role of Green 10 as an advocacy network in the EU environmental policy by analysing the official documents, laws, policy proposals and consultations. First of all, it built a conceptual framework to understand the relationship between environmental NGOs and the EU decision-makers. A clear comparison between advocacy networks, epistemic communities and interest groups had been made in the first chapter. Additionally, the multi-level governance approach had been defined in differences with intergovernmentalism and neofunctionalism, while representing the methods of advocacy networks to engage in multi-level governance. Secondly, the historical background of environmental policy in the EU had been detailed and the role of the ENGOS in the decision-making process had been analysed. Thirdly, the Green 10 as an advocacy network had been elaborated in terms of its foundation, objectives, members, study areas and other features. Fourthly, the official documents had been investigated to analyse the differences and similarities between Green 10 and the EU environmental policy. The major environmental legislation had been detailed and then the Green 10's financial dependency, participation in meetings, membership to the expert groups as well as the number of public consultations had been analysed. Finally, the evolution of each environmental policy subject including climate change had been examined in comparison of the documents between Green 10's recommendations and developments in the EU environmental policies.

There had been two main hypotheses of the thesis. Firstly, it claims that Green 10's recommendations and EU environmental policies show similarities, especially on the nature protection and climate change subjects. Green 10 and its member ENGOS actively participate in the policy-making process on environmental issues in the EU. Especially, they engage in the proposal period of the legislation through various ways.

As the second hypothesis, I argued that the financial dependency of member ENGOs to the EU funds could make them less opponent against EU policies. However, acting collectively as a network gives them the ability to criticize the EU more freely. As a detailed analysis had been figured in Chapter 4, it is possible to evaluate that the ENGOs who had limited EU funds on the overall budget are more extraverted among others such as BirdLife, CAN, Greenpeace, WWF and T&E. They more actively participate in the policy-making processes, more commonly involve expert groups and meetings with the EU representatives, share more consultations and recommendations for the environmental proposals. However, Green 10 involves both kinds of ENGOs who are more active and less willing to participate. So, Green 10 is in the balance of critical and restrained approach to the EU environmental policies.

In this study, I tried to do something different. I picked up a subject that had never been studied academically before. I created a frame with my personal environmental concerns. The personal question that shaped this study was “I am an active part of environmental NGOs, but do I really change something?”. To find answers to this question, I decided to study the Green 10 coalition and its political addressee the European Union.

The European Union, in that term, is a strong political actor in global environmental policies. While the internal environmental legislation becomes stricter and effective, its global leadership on the environmental negotiations strengthen its political dignity. Besides, multi-level governance dominated the internal political system of the EU initiates the ability for the civil society and citizens to contribute policy-making processes. Civil society uses this in the most effective way. When we evaluate the EU overall in terms of environmental policies, it presents a powerful picture to secure the future of our environment and climate.

On the other side, the Green 10 is one of the leading umbrella organizations that actively engage and influence the EU decision-making process for better

environmental legislation. It is a strong advocacy network because of its influential, globally well-known and institutionalized members. As a structure, it is an informal network without any written formation charter, office, staff or a significant budget as well as any regular documentation, website etc. It means it does not generate any economical or bureaucratic burden to its members. Additionally, its low brand value and recognition do not shade the member's values. On the positive side, acting in a collective structure makes the member ENGOS more strong and influential against the EU institutions. It strengthens their position and creates a powerful impression over the decision makers.

Shortly, being a part of Green 10's members does not give any negative to its members, more than positive impacts. Surely, they gain more than what they can gain when they act as organization alone. However, it is clear that Green 10 does not represent very significant added values to the member ENGOS. In any case, the members are strong enough to engage and influence the environmental legislation of the EU as could be understood from their financial capacity, interactions with the EU institutions and contributions to the policy-making process. Furthermore, the member ENGOS are aware that Green 10 is not a strong structure, even so they do not stop to act in the frame of Green 10. The members see the Green 10 as an instrument which strengthens their institutional capacity over the decision-makers. However, it is possible to evaluate that there is a decrease in the interest of the members for Green 10 in the last 5 years. While Green 10 has published more than 45 documents between 1999 and 2014, there are only 8 documents between 2015 and 2019. They still act collectively and share reactions for current issues, but it is possible to say that they are not as much interested as previous years after the Paris climate negotiations.

Eventually, these two actors are in an on-going interaction. As long as the environmental concerns are on the stage, these ENGOS and the advocacy networks like Green 10 will actively take part. It is possible to evaluate that there is no such issue that Green 10 and its member ENGOS do not pursue and

engage. From climate change to protection of biodiversity and from environmental liability to sustainable development, Green 10 actively takes part in policy-making. The environmental issues are always on the main agenda of decision makers because of the active lobbying and campaigning of these ENGOs. They are not trying to make something done but keep the environmental issues warm until they ensure its safety in the future. In that term, I can claim that Green 10 is a successful and leading actor on the EU environmental policies with its dedication to act collectively and the great efforts of its member ENGOs.

As a future research, there are good opportunities to deepen the study. For the thesis, I only used the written texts to understand the role of Green 10 on the EU environmental policies. However, I did not actively communicate with the member ENGOs or the representatives of the EU to understand their perception over the Green 10. So, for future, I am planning to extend the analysis via the interviews with representatives of ENGOs and policy-makers or surveys with ENGO professionals in Europe or any other green ideas.

Today, it is sure that we are living in a different world. It is not the same planet that our leaders, professors or families lived years ago. No need to go much further back, since my birthday in 1993, we are 2,3 billion more people on the Earth and 4 times more people than the beginning of the 20th century (World Bank, 2020). In this ever changing world, the problems that humanity tries to deal with have been changing year by year. However, it is clear that today there is no bigger problem than the environmental concerns and climate change which we have to confront. I would like to end my words with a hope for a peaceful planet in which all creatures live in a harmony like the wing beats of a bird.



## REFERENCES

- Adler, E. (1992). The emergence of cooperation: national epistemic communities and the international evolution of the idea of nuclear arms control. *International Organization*, 46(1), 101–145. <https://doi.org/10.1017/s0020818300001466>
- Ahu Sandal, N. (2011). Religious actors as epistemic communities in conflict transformation: the cases of South Africa and Northern Ireland. *Review of International Studies*, 37(3), 929–949. <https://doi.org/10.1017/s0260210510001592>
- Amann, M. (Ed.). (2018, December). *Progress Towards the Achievement of the EU's Air Quality and Emissions Objectives*. Retrieved from [https://ec.europa.eu/environment/air/pdf/clean\\_air\\_outlook\\_overview\\_report.pdf](https://ec.europa.eu/environment/air/pdf/clean_air_outlook_overview_report.pdf)
- Bache, I., Bartle, I., & Flinders, M. (2016). Multi-level Governance. In *Handbook on Theories of Governance* (pp. 486–498). Cheltenham, United Kingdom: Edward Elgar Publishing.
- BBC. (2019, November 14). European Investment Bank drops fossil fuel funding. *BBC*. Retrieved from <https://www.bbc.com>
- Becker, E. (2016). The Influence of Environmental NGOs in the Global Society . *Butler Journal of Undergraduate Research*, 2(17), 1–21. Retrieved from <https://digitalcommons.butler.edu/bjur/vol2/iss1/17>
- Berny, N., & Rootes, C. (2018). Environmental NGOs at a crossroads? *Environmental Politics*, 27(6), 947–972. <https://doi.org/10.1080/09644016.2018.1536293>
- Biliouri, D. (1999). Environmental Ngos in Brussels: How powerful are their lobbying activities? *Environmental Politics*, 8(2), 173–182. <https://doi.org/10.1080/09644019908414472>
- BirdLife International. (n.d.-a). About BirdLife International. Retrieved March 14, 2020, from <http://www.birdlife.org/worldwide/partnership/about-birdlife>
- BirdLife International. (n.d.-b). BirdLife Partners - Europe and Central Asia. Retrieved March 14, 2020, from <http://www.birdlife.org/europe-and-central-asia/partnership/birdlife-partners-europe-and-central-asia>
- BirdLife International. (n.d.-c). Policy. Retrieved March 12, 2020, from <http://www.birdlife.org/europe-and-central-asia/policy>
- BirdLife International. (n.d.-d). The Birds and Habitats Directives. Retrieved March 12, 2020, from <http://www.birdlife.org/europe-and-central-asia/birds-and-habitats-directives>
- Bloodgood, E., & Tremblay-Boire, J. (2016). Does government funding depoliticize non-governmental organizations? Examining evidence from Europe. *European Political Science Review*, 9(3), 401–424. <https://doi.org/10.1017/s1755773915000430>

- Broscheid, A., & Coen, D. (2007). Lobbying activity and fora creation in the EU: empirically exploring the nature of the policy good. *Journal of European Public Policy*, 14(3), 346–365. <https://doi.org/10.1080/13501760701243749>
- Bunea, A. (2012). Issues, preferences and ties: determinants of interest groups' preference attainment in the EU environmental policy. *Journal of European Public Policy*, 20(4), 552–570. <https://doi.org/10.1080/13501763.2012.726467>
- CAN Europe. (n.d.-a). About CAN Europe. Retrieved March 14, 2020, from <http://www.caneurope.org/about-us>
- CAN Europe. (n.d.-b). CAN Europe member directory. Retrieved March 14, 2020, from <http://www.caneurope.org/member-directory?force=1>
- Ceballos, J. D., de Lange, D., Haro, S. G., & Salazar, M. D. V. (2012). Environmental Nongovernmental Organization Coalitions: How the Green 10 Influences European Union Institutions. In D. R. Gallagher (Ed.), *Environmental Leadership: A Reference Handbook* (pp. 254–263). Los Angeles, USA: SAGE Publications.
- CEE Bankwatch. (2020, May 12). Who we are. Retrieved May 17, 2020, from <https://bankwatch.org/about/who-we-are>
- CEE Bankwatch Network. (2011, December). *Carbon rising: European Investment Bank energy lending 2007-2010*. Retrieved from <http://bankwatch.org/sites/default/files/EIB-carbon-rising.pdf>
- Ciplet, D. (2014). Contesting Climate Injustice: Transnational Advocacy Network Struggles for Rights in UN Climate Politics. *Global Environmental Politics*, 14(4), 75–96. [https://doi.org/10.1162/glep\\_a\\_00258](https://doi.org/10.1162/glep_a_00258)
- Citizens for Europe. (n.d.). CEE Bankwatch Network. Retrieved March 15, 2020, from <https://www.citizensforeurope.eu/organisation/cee-bankwatch-network>
- Coen, D. (2007). Empirical and theoretical studies in EU lobbying. *Journal of European Public Policy*, 14(3), 333–345. <https://doi.org/10.1080/13501760701243731>
- Council of European Communities. (1983, February 17). Resolution on the continuation and implementation of a European Community policy and action programme on the environment (1982 to 1986). Retrieved February 22, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:41983X0217&from=EN>
- Council of European Communities. (1987, December 7). Resolution on the continuation and implementation of a European Community policy and action programme on the environment (1987-1992) . Retrieved February 23, 2020, from <https://www.ab.gov.tr/files/SEPB/cevrefaslidokumanlar/4theap.pdf>
- Council of the European Union. (2014, October 24). Cover note on 2030 Climate and Energy Policy Framework. Retrieved May 15, 2020, from <http://data.consilium.europa.eu/doc/document/ST-169-2014-INIT/en/pdf>
- Council of the European Union. (2018, December 4). *Energy efficiency, renewables, governance of the Energy Union: Council signs off on 3 major clean energy*

- files* [Press release]. Retrieved May 31, 2020, from <https://www.consilium.europa.eu/en/press/press-releases/2018/12/04/energy-efficiency-renewables-governance-of-the-energy-union-council-signs-off-on-3-major-clean-energy-files/>
- Council of the European Union. (2019a, April 15). *Stricter CO2 emission standards for cars and vans signed off by the Council* [Press release]. Retrieved May 31, 2020, from <https://www.consilium.europa.eu/en/press/press-releases/2019/04/15/stricter-co2-emission-standards-for-cars-and-vans-signed-off-by-the-council/>
- Council of the European Union. (2019b, June 13). *Cutting emissions: Council adopts CO2 standards for trucks* [Press release]. Retrieved May 31, 2020, from <https://www.consilium.europa.eu/en/press/press-releases/2019/06/13/cutting-emissions-council-adopts-co2-standards-for-trucks/>
- Council of the European Union. (2020, March 18). Climate change: what the EU is doing. Retrieved May 15, 2020, from <https://www.consilium.europa.eu/en/policies/climate-change/>
- Cross, M. K. D. (2012). Rethinking epistemic communities twenty years later. *Review of International Studies*, 39(1), 137–160. <https://doi.org/10.1017/s0260210512000034>
- Daniell, K. A., & Kay, A. (2017). Multi-level Governance: An Introduction. *Multi-Level Governance: Conceptual Challenges and Case Studies from Australia*, 3–32. <https://doi.org/10.22459/mg.11.2017.01>
- Dinu, A. (2019, April). *Endocrine disruptors: An overview of latest developments at European level in the context of plant protection products*. <https://doi.org/10.2861/569733>
- Doga Derneği. (n.d.). Doğa Derneği . Retrieved April 1, 2020, from <https://www.dogaderneği.org/hikayemiz/>
- Doh, J. P., & Guay, T. R. (2006). Corporate Social Responsibility, Public Policy, and NGO Activism in Europe and the United States: An Institutional-Stakeholder Perspective. *Journal of Management Studies*, 43(1), 47–73. <https://doi.org/10.1111/j.1467-6486.2006.00582.x>
- Douglas, E. (2020, April 11). Defer EU climate goals, top Merkel colleague urges. *DW.COM*. Retrieved from <https://www.dw.com>
- Drake, W. J., & Nicolaïdis, K. (1992). Ideas, interests, and institutionalization: “trade in services” and the Uruguay Round. *International Organization*, 46(1), 37–100. <https://doi.org/10.1017/s0020818300001454>
- E. de Vries, C., & Hoffmann, I. (2019). *Great expectations: The New European Commission, its Ambition and European Public Opinion*. Retrieved from [https://www.politico.eu/wp-content/uploads/2019/11/Great\\_Expectations\\_eupinions\\_en.pdf](https://www.politico.eu/wp-content/uploads/2019/11/Great_Expectations_eupinions_en.pdf)

- Eckard, R., & Richard, S. (1985). *Environmental Protection Policy*. Berlin , Germany: Walter de Gruyter.
- EEB. (n.d.-a). Work Areas. Retrieved March 17, 2020, from <https://eeb.org/work-areas/>
- EEB. (n.d.-b). Our Members. Retrieved March 17, 2020, from <https://eeb.org/membership/our-members/>
- EU Publications Office. (n.d.). EUR-Lex. Retrieved April 12, 2020, from <https://eur-lex.europa.eu/homepage.html>
- EUR-Lex. (n.d.). Summary of Environment and Climate Change Legislation. Retrieved April 14, 2020, from [https://eur-lex.europa.eu/summary/chapter/environment.html?root\\_default=SUM\\_1\\_CODED=20&locale=en](https://eur-lex.europa.eu/summary/chapter/environment.html?root_default=SUM_1_CODED=20&locale=en)
- European Central Bank. (n.d.). Economic and Monetary Union. Retrieved January 17, 2020, from <https://www.ecb.europa.eu/ecb/history/emu/html/index.en.html>
- European Commission. (n.d.-a). Consultations. Retrieved March 2, 2020, from [https://ec.europa.eu/info/consultations\\_en](https://ec.europa.eu/info/consultations_en)
- European Commission. (n.d.-b). Consumer Policy in the European Community: An Overview. Retrieved February 5, 2020, from [https://ec.europa.eu/commission/presscorner/detail/en/MEMO\\_92\\_68](https://ec.europa.eu/commission/presscorner/detail/en/MEMO_92_68)
- European Commission. (n.d.-c). Transparency Register . Retrieved December 17, 2019, from <https://ec.europa.eu/transparencyregister/public/homePage.do>
- European Commission. (n.d.-d). Greenpeace on Transparency Register. Retrieved March 17, 2020, from <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=9832909575-41>
- European Commission. (n.d.-e). Candidate Countries. Retrieved March 15, 2020, from <https://ec.europa.eu/environment/enlarg/candidates.htm>
- European Commission. (n.d.-f). LIFE programme 2014-2020 data hub. Retrieved May 14, 2020, from <https://life.easme-web.eu/#>
- European Commission. (n.d.-g). Transatlantic Trade and Investment Partnership (TTIP). Retrieved May 3, 2020, from <https://ec.europa.eu/trade/policy/in-focus/ttip/>
- European Commission. (n.d.-h). Register of Commission expert groups and other similar entities. Retrieved April 15, 2020, from <https://ec.europa.eu/transparency/regexpert/index.cfm?do=faq.faq&aide=2>
- European Commission. (n.d.-i). EEB on Tranparency Register. Retrieved April 14, 2020, from <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=06798511314-27>

- European Commission. (n.d.-j). Naturefriends on Transparency Register. Retrieved April 15, 2020, from <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=88140777010-24>
- European Commission. (n.d.-k). Financing Natura 2000 . Retrieved May 5, 2020, from [https://ec.europa.eu/environment/nature/natura2000/financing/index\\_en.htm](https://ec.europa.eu/environment/nature/natura2000/financing/index_en.htm)
- European Commission. (n.d.-l). CAFE Reference Documents. Retrieved April 22, 2020, from <https://ec.europa.eu/environment/archives/cafegeneral/keydocs.htm>
- European Commission. (1976, March 15). Second Environmental Research Programme (1976 to 1980) . Retrieved February 15, 2020, from <https://op.europa.eu/en/publication-detail/-/publication/8f5ecbdd-6ab9-4a83-be9a-38629267fe72>
- European Commission. (1996, July 30). Communication the review of the Community Strategy for Waste Management. Retrieved April 20, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:51996PC0399&rid=4>
- European Commission. (2001, May 15). Communication on a Sustainable Europe for a Better World: A European Union Strategy for Sustainable Development. Retrieved May 11, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52001DC0264&from=EN>
- European Commission. (2002). Communication on Implementing the Community Strategy to Reduce CO2 Emissions from Cars: Third annual report on the effectiveness of the strategy. Retrieved May 16, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52002DC0693&from=EN>
- European Commission. (2003a, May 21). Communication on Forest Law Enforcement, Governance and Trade (FLEGT) Proposal for an EU Action Plan . Retrieved April 17, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52003DC0251&from=EN>
- European Commission. (2003b). *Eurobarometer 59* . Retrieved from [https://ec.europa.eu/commfrontoffice/publicopinion/archives/eb/eb59/eb59\\_rapport\\_final\\_en.pdf](https://ec.europa.eu/commfrontoffice/publicopinion/archives/eb/eb59/eb59_rapport_final_en.pdf)
- European Commission. (2005, December 22). Communication on Thematic Strategy on the sustainable use of natural resources. Retrieved April 20, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52005DC0670&from=EN>
- European Commission. (2006a, May 22). Communication on halting the loss of biodiversity by 2010 and beyond: Sustaining ecosystem services for human well-being . Retrieved April 18, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52006DC0216&from=EN>
- European Commission. (2006b, February 28). Communication on The European Environment & Health Action Plan 2004-2010. Retrieved April 24, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52004DC0416>

- European Commission. (2007a, January 10). Communication on Limiting Global Climate Change to 2 degrees Celsius The way ahead for 2020 and beyond . Retrieved May 15, 2020, from <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF>
- European Commission. (2007b). *EU Policy for a sustainable use of pesticides: The story behind the Strategy*. Retrieved from [https://ec.europa.eu/environment/archives/ppps/pdf/pesticides\\_en.pdf](https://ec.europa.eu/environment/archives/ppps/pdf/pesticides_en.pdf)
- European Commission. (2007c, March 21). Communication on European Transparency Initiative (ETI). Retrieved May 3, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM%3Aai0003>
- European Commission. (2008a, July 16). Communication on the Sustainable Consumption and Production and Sustainable Industrial Policy Action Plan . Retrieved April 22, 2020, from <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2008:0397:FIN:en:PDF>
- European Commission. (2008b, November 13). Communication on energy efficiency for the 2020 goal. Retrieved April 27, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:en0002>
- European Commission. (2013). *Environmental Liability Directive: A Short Overview*. Retrieved from <https://ec.europa.eu/environment/legal/liability/pdf/Summary%20ELD.pdf>
- European Commission. (2014). Structural Funds Regulations 2007-2013. Retrieved April 4, 2020, from [https://ec.europa.eu/regional\\_policy/en/information/legislation/regulations/2007-2013/](https://ec.europa.eu/regional_policy/en/information/legislation/regulations/2007-2013/)
- European Commission. (2015, February 25). Communication on The Paris Protocol – A blueprint for tackling global climate change beyond 2020. Retrieved May 5, 2020, from [https://eur-lex.europa.eu/resource.html?uri=cellar:e27fdb4d-bdce-11e4-bbe1-01aa75ed71a1.0003.03/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:e27fdb4d-bdce-11e4-bbe1-01aa75ed71a1.0003.03/DOC_1&format=PDF)
- European Commission. (2016a, December 5). How the Commission is organised. Retrieved February 1, 2020, from [https://ec.europa.eu/info/about-european-commission/organisational-structure/how-commission-organised\\_en](https://ec.europa.eu/info/about-european-commission/organisational-structure/how-commission-organised_en)
- European Commission. (2016b, November 23). LIFE Climate Action. Retrieved May 7, 2020, from [https://ec.europa.eu/clima/policies/budget/life\\_en](https://ec.europa.eu/clima/policies/budget/life_en)
- European Commission. (2016c, October 7). Reform of the common fisheries policy. Retrieved May 1, 2020, from [https://ec.europa.eu/fisheries/reform\\_en](https://ec.europa.eu/fisheries/reform_en)
- European Commission. (2016d, November 22). Communication on next steps for a sustainable European future. Retrieved April 5, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016DC0739&from=EN>

- European Commission. (2017a, February 16). 2020 climate & energy package. Retrieved May 14, 2020, from [https://ec.europa.eu/clima/policies/strategies/2020\\_en](https://ec.europa.eu/clima/policies/strategies/2020_en)
- European Commission. (2017b, February 13). Good-quality water in Europe (EU Water Directive) . Retrieved April 23, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legissum:l28002b>
- European Commission. (2017c, February 16). Reducing CO2 emissions from passenger cars - before 2020. Retrieved May 2, 2020, from [https://ec.europa.eu/clima/policies/transport/vehicles/cars\\_en](https://ec.europa.eu/clima/policies/transport/vehicles/cars_en)
- European Commission. (2017d, February 16). Reducing emissions from aviation. Retrieved May 2, 2020, from [https://ec.europa.eu/clima/policies/transport/aviation\\_en](https://ec.europa.eu/clima/policies/transport/aviation_en)
- European Commission. (2018a, October 30). LIFE - Climate action sub-programme EASME European Commission. Retrieved May 14, 2020, from <https://ec.europa.eu/easme/en/section/life/life-climate-action-sub-programme>
- European Commission. (2018b, November 19). Single European Sky. Retrieved April 27, 2020, from [https://ec.europa.eu/transport/modes/air/ses\\_en](https://ec.europa.eu/transport/modes/air/ses_en)
- European Commission. (2019a). *Special Eurobarometer 490 "Climate Change"* (490). Retrieved from <https://ec.europa.eu/commfrontoffice/publicopinion/index.cfm/ResultDoc/download/DocumentKy/87643>
- European Commission. (2019b, August 7). REACH - Chemicals. Retrieved April 24, 2020, from [https://ec.europa.eu/environment/chemicals/reach/reach\\_en.htm](https://ec.europa.eu/environment/chemicals/reach/reach_en.htm)
- European Commission. (2019c, August 7). The REACH REFIT Evaluation (REACH Review 2017). Retrieved April 25, 2020, from [https://ec.europa.eu/environment/chemicals/reach/review\\_2017\\_en.htm](https://ec.europa.eu/environment/chemicals/reach/review_2017_en.htm)
- European Commission. (2019d, August 2). Sustainable Development. Retrieved April 2, 2020, from <https://ec.europa.eu/environment/archives/eussd/index.htm>
- European Committee of the Regions. (2014, February 20). CoR - MLG Charter. Retrieved February 2, 2020, from <https://portal.cor.europa.eu/mlgcharter/Pages/MLG-charter.aspx>
- European Convention. (2003, July 18). Draft Treaty Establishing a Constitution for Europe. Retrieved April 15, 2020, from <http://european-convention.europa.eu/docs/Treaty/cv00850.en03.pdf>
- European Investment Bank. (2019, November 14). *EU Bank launches ambitious new climate strategy and Energy Lending Policy* [Press release]. Retrieved from <https://www.eib.org/en/press/all/2019-313-eu-bank-launches-ambitious-new-climate-strategy-and-energy-lending-policy>
- European Parliament. (n.d.-a). The Treaty of Nice and the Convention on the Future of Europe | Fact Sheets on the European Union | European Parliament. Retrieved

March 12, 2020, from <https://www.europarl.europa.eu/factsheets/en/sheet/4/the-treaty-of-nice-and-the-convention-on-the-future-of-europe>

European Parliament. (n.d.-b). Ordinary legislative procedure. Retrieved March 23, 2020, from [https://www.europarl.europa.eu/infographic/legislative-procedure/index\\_en.html](https://www.europarl.europa.eu/infographic/legislative-procedure/index_en.html)

European Parliament. (2014, December). *EU Transparency Register*. Retrieved from <https://www.europarl.europa.eu/EPRS/EPRS-Briefing-542170-European-Transparency-Register-FINAL.pdf>

European Parliament. (2018, March). *Report on the implementation of the 7th Environment Action Programme*. Retrieved from [https://www.europarl.europa.eu/doceo/document/A-8-2018-0059\\_EN.html](https://www.europarl.europa.eu/doceo/document/A-8-2018-0059_EN.html)

European Parliament. (2019, May). *The Common Fisheries Policy: Origins and Development*. Retrieved from European Parliament. (2020, February). Financing the Trans-European Networks. Retrieved from [https://www.europarl.europa.eu/ftu/pdf/en/FTU\\_3.5.2.pdf](https://www.europarl.europa.eu/ftu/pdf/en/FTU_3.5.2.pdf)

European Parliament. (2020a, February). *Financing the Trans-European Networks*. Retrieved from [https://www.europarl.europa.eu/ftu/pdf/en/FTU\\_3.5.2.pdf](https://www.europarl.europa.eu/ftu/pdf/en/FTU_3.5.2.pdf)

European Parliament. (2020b, May). Inter-institutional negotiations on the Transparency Register. Retrieved May 15, 2020, from <https://www.europarl.europa.eu/tr-negotiations/en/home/welcome-page.html>

European Parliament, & Council of the European Union. (2000a, December 22). Directive 2000/60/EC for establishing a framework for Community action in the field of water policy. Retrieved April 14, 2020, from [https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF)

European Parliament, & Council of the European Union. (2000b, September 18). Directive on end-of life vehicles. Retrieved April 22, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02000L0053-20130611&qid=1405610569066&from=EN>

European Parliament, & Council of the European Union. (2002, April 25). UN climate negotiations: Kyoto Protocol — first commitment period. Retrieved April 15, 2020, from [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legissum:200101\\_1](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legissum:200101_1)

European Parliament, & Council of the European Union. (2003, January 27). Directive on waste electrical and electronic equipment (WEEE). Retrieved April 22, 2020, from [https://eur-lex.europa.eu/resource.html?uri=cellar:ac89e64f-a4a5-4c13-8d96-1fd1d6bcaa49.0004.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:ac89e64f-a4a5-4c13-8d96-1fd1d6bcaa49.0004.02/DOC_1&format=PDF)

European Parliament, & Council of the European Union. (2004, April 30). Directive on environmental liability with regard to the prevention and remedying of environmental damage. Retrieved May 14, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004L0035&from=EN>



- European Parliament, & Council of the European Union. (2005, July 22). Directive on establishing a framework for the setting of ecodesign requirements for energy-using products . Retrieved April 27, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32005L0032&from=EN>
- European Parliament, & Council of the European Union. (2008, November 22). Directive on waste and repealing certain Directives. Retrieved April 24, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098&from=EN>
- European Parliament, & Council of the European Union. (2009a, June 5). Decision on the effort of Member States to reduce their greenhouse gas emissions to meet the Community's greenhouse gas emission reduction commitments up to 2020. Retrieved May 14, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009D0406&from=EN>
- European Parliament, & Council of the European Union. (2009b, June 5). Directive on regards the specification of petrol, diesel and gas-oil and introducing a mechanism to monitor and reduce greenhouse gas emissions. Retrieved May 15, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0030&from=EN>
- European Parliament, & Council of the European Union. (2013a, June 18). Regulation on a mechanism for monitoring and reporting greenhouse gas emissions and for reporting other information at national and Union level relevant to climate change. Retrieved May 6, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0525&from=EN>
- European Parliament, & Council of the European Union. (2013b, August 4). UN climate negotiations: Kyoto Protocol — second commitment period. Retrieved May 15, 2020, from [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:2001\\_15](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:2001_15)
- European Parliament, & Council of the European Union. (2013c, December 28). Decision on a General Union Environment Action Programme to 2020 'Living well, within the limits of our planet.' Retrieved May 4, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1386&from=EN>
- European Parliament, & Council of the European Union. (2014a, May 20). Regulation on fluorinated greenhouse gases. Retrieved May 15, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0517&from=EN>
- European Parliament, & Council of the European Union. (2014b, November 4). Regulation on the prevention and management of the introduction and spread of invasive alien species. Retrieved April 19, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R1143&from=EN>
- European Parliament, & Council of the European Union. (2014c, May 20). Regulation on the European Maritime and Fisheries Fund . Retrieved May 1, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0508&from=EN>

- European Parliament, & Council of the European Union. (2017, July 28). Regulation on setting a framework for energy labelling. Retrieved May 15, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1369&from=EN>
- European Parliament, & Council of the European Union. (2018, February 14). Directive to enhance cost-effective emission reductions and low-carbon investments . Retrieved May 17, 2020, from <http://data.consilium.europa.eu/doc/document/PE-63-2017-INIT/en/pdf>
- European Union. (n.d.). Countries. Retrieved March 2, 2020, from [https://europa.eu/european-union/about-eu/countries\\_en](https://europa.eu/european-union/about-eu/countries_en)
- European Union. (2012a, October 26). The Treaty on the Functioning of the Europe Union. Retrieved April 12, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:12012E/TXT&from=EN>
- European Union. (2012b). *Energy roadmap 2050*. <https://doi.org/10.2833/10759>
- European Union. (2015, September 21). Biodiversity Strategy for 2020. Retrieved April 19, 2020, from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:ev0029>
- FoE Europe. (n.d.-a). About us. Retrieved March 18, 2020, from <http://www.foeeurope.org/about>
- FoE Europe. (n.d.-b). Climate justice. Retrieved March 21, 2020, from <http://www.foeeurope.org/climate-justice>
- Fontaine, P. (2010). *Europe in 12 lessons*. Retrieved from [https://europa.rs/images/publikacije/26-EU\\_In\\_12\\_Lessons.pdf](https://europa.rs/images/publikacije/26-EU_In_12_Lessons.pdf)
- Frooman, J., & Murrell, A. J. (2005). Stakeholder Influence Strategies: The Roles of Structural and Demographic Determinants. *Business & Society*, 44(1), 3–31. <https://doi.org/10.1177/0007650304273434>
- Garrett, G., & Tsebelis, G. (1996). An institutional critique of intergovernmentalism. *International Organization*, 50(2), 269–299. <https://doi.org/10.1017/s0020818300028563>
- Gough, C., & Shackley, S. (2001). The Respectable Politics of Climate Change: The Epistemic Communities and NGOs. *International Affairs*, 77(2), 329–346. <https://doi.org/10.1111/1468-2346.00195>
- Green 8. (2001, August). *Introducing European Environmental NGOs: Their role and importance in European Union decision-making*. Retrieved from <https://d2ouvy59p0dg6k.cloudfront.net/downloads/greeng8brochurelight.pdf>
- Green 8. (2002, July). *How green is the Prodi Commission?: The Green 8 Environmental Mid-Term Review*. Retrieved from <https://www.transportenvironment.org/sites/te/files/media/7-02-G8ProdiMidTermReview.pdf>

- Green 8. (2003a, June). *The European Convention: Green 8 summary briefing*. Retrieved from <http://www.panda.org/downloads/europe/g8lettertoeuropeancouncil16june2003.pdf>
- Green 8. (2003b). *Towards a Green EU Constitution: Greening the European Convention Proposal*. Retrieved from <http://www.panda.org/downloads/europe/g8igcenfinal88032.pdf>
- Green 8. (2003c, October). *Environmental Manifesto for European Elections 2004*. Retrieved from <https://www.transportenvironment.org/sites/te/files/media/Green8EPElectionManifesto04.pdf>
- Green 8. (2003d, June). *The European Convention: Green 8 Assessment*. Retrieved from <http://www.panda.org/downloads/europe/g8assessment061603finalversion.pdf>
- Green 8. (2003e, February 1). *Open letter on defending the environmental dimension* [Open letter]. Retrieved from [https://drive.google.com/open?id=11oJc8J1jURbySa\\_gOSt1SE58qvXTQ0pJ](https://drive.google.com/open?id=11oJc8J1jURbySa_gOSt1SE58qvXTQ0pJ)
- Green 8. (2004a, August). *Green Eight Review of the EU Sustainable Development Strategy*. Retrieved from <https://www.transportenvironment.org/sites/te/files/media/2004Green8SDSReview.pdf>
- Green 8. (2004b, April). *Position Paper on Corporate Social Responsibility & The EU Multi-Stakeholder Forum Process*. Retrieved from [https://www.transportenvironment.org/sites/te/files/media/April2004\\_Position-CSR-EU\\_Green8.pdf](https://www.transportenvironment.org/sites/te/files/media/April2004_Position-CSR-EU_Green8.pdf)
- Green 8, Micciche, R., & Riss, J. I. (Eds.). (2003). *One year to go: The 2003 Green 8 review of the European Commission's environmental policies*. Retrieved from <https://drive.google.com/open?id=14WA6f-XdJfrvNpOnavSGFfkIHMprvzYy>
- Green 9. (2005a). *Introducing the Green 9 group of environmental NGOs active at EU level*. Retrieved from [https://www.foeeurope.org/sites/default/files/publications/green9\\_brochure\\_english\\_2005.pdf](https://www.foeeurope.org/sites/default/files/publications/green9_brochure_english_2005.pdf)
- Green 9. (2005b, January 25). *Open Letter on 'To Do' list for the Barroso Commission* [Open letter]. Retrieved from <http://assets.panda.org/downloads/barrosothankyouletapril2005.pdf>
- Green 9. (2005c, July 12). *Open Letter on the agenda July 20: Thematic Environmental Strategies* [Open letter]. Retrieved from <http://www.panda.org/downloads/europe/green10letteroneuthematicstrategies.pdf>
- Green 10. (n.d.-a). Green 10 Official Website. Retrieved July 7, 2019, from <https://green10.org/>

- Green 10. (n.d.-b). *Open Letter on Sustainability: Our vision for a new EU budget* [Open letter]. Retrieved from [http://www.env-health.org/IMG/pdf/HEAL\\_Green\\_10\\_submission\\_EU\\_BUDGET-2.pdf](http://www.env-health.org/IMG/pdf/HEAL_Green_10_submission_EU_BUDGET-2.pdf)
- Green 10. (2005a, July 1). *Open Letter to President Barroso* [Open letter]. Retrieved from <http://assets.panda.org/downloads/g10letterbarrosojuly1.pdf>
- Green 10. (2005b, September 23). *Open Letter on 'Reducing the climate change impact of aviation'* [Open letter]. Retrieved from [https://www.transportenvironment.org/sites/te/files/media/2005\\_09\\_g10\\_letter\\_commissioners\\_aviation.pdf](https://www.transportenvironment.org/sites/te/files/media/2005_09_g10_letter_commissioners_aviation.pdf)
- Green 10. (2005c, October). *Financing a Better Future: The Environmental Challenges for the Financial Perspectives 2007-2013*. Retrieved from [https://www.transportenvironment.org/sites/te/files/media/2005-10\\_green10\\_position\\_2007-13\\_financial\\_perspectives.pdf](https://www.transportenvironment.org/sites/te/files/media/2005-10_green10_position_2007-13_financial_perspectives.pdf)
- Green 10. (2006a, March). *A programme for the Sustainable Development of the European Union*. Retrieved from [https://www.foeeurope.org/sites/default/files/publications/green10\\_programme\\_for\\_sds\\_march2006.pdf](https://www.foeeurope.org/sites/default/files/publications/green10_programme_for_sds_march2006.pdf)
- Green 10. (2006b, February 22). *G-10 Position on Lobbying in the EU* [Press release]. Retrieved from <http://www.caneurope.org/docman/members/can-europe-procedural-policies/2871-green-10-position-paper-on-lobbying-february-2006/file>
- Green 10. (2006c, August). *Green 10 contribution to the Green Paper on the Transparency Initiative*. Retrieved from [https://www.transportenvironment.org/docs/Publications/2006/2006-08\\_cscg\\_eti\\_contribution\\_part\\_iii.pdf](https://www.transportenvironment.org/docs/Publications/2006/2006-08_cscg_eti_contribution_part_iii.pdf)
- Green 10. (2007a, April). *'Could Try Harder' A mid-term report on the European Commission's environmental record*. Retrieved from [https://www.env-health.org/IMG/pdf/24-\\_G10\\_-\\_Could\\_Try\\_Harder\\_-\\_A\\_mid-term\\_report\\_on\\_the\\_European\\_Commission\\_s\\_environmental\\_record\\_REPORT.pdf](https://www.env-health.org/IMG/pdf/24-_G10_-_Could_Try_Harder_-_A_mid-term_report_on_the_European_Commission_s_environmental_record_REPORT.pdf)
- Green 10. (2007b, January 23). *Open letter on reducing CO2 emissions from light duty vehicles* [Open letter]. Retrieved from [http://assets.panda.org/downloads/2007\\_01\\_green10\\_letter\\_on\\_cars\\_co2.pdf](http://assets.panda.org/downloads/2007_01_green10_letter_on_cars_co2.pdf)
- Green 10. (2007c, February 2). *The Green 10's Ten Green Principles for the EU Budget Review* [Press release]. Retrieved from [http://www.env-health.org/IMG/pdf/Green10\\_Principles\\_EU\\_Budget\\_Review\\_February\\_2007.pdf](http://www.env-health.org/IMG/pdf/Green10_Principles_EU_Budget_Review_February_2007.pdf)
- Green 10. (2008, September). *An environmental roadmap for 2009-2014: The role of the European Parliament*. Retrieved from [https://d3bzkjkd62gi12.cloudfront.net/downloads/g10\\_european\\_elections\\_2009\\_2014.pdf](https://d3bzkjkd62gi12.cloudfront.net/downloads/g10_european_elections_2009_2014.pdf)
- Green 10. (2009a, June). *Off target - European Commission 2004-2009 Environmental Progress Report and Lessons for the Next Commission*. Retrieved from

[https://foeeurope.org/sites/default/files/publications/foee\\_g10\\_off\\_target\\_0609.pdf](https://foeeurope.org/sites/default/files/publications/foee_g10_off_target_0609.pdf)

- Green 10. (2009b, October). *Green 10 Briefing on Climate Change for the European Parliament*. Briefing presented at the Meet Civil Society Fair, Brussels, Belgium.
- Green 10. (2009c, October). *Green 10 Briefing on Nature & Health for the European Parliament*. Briefing presented at the Meeting Civil Society Fair, Brussels, Belgium. Retrieved from [https://env-health.org/IMG/pdf/7-\\_Green\\_10\\_Briefing\\_for\\_the\\_European\\_Parliament\\_-\\_Nature\\_Health.pdf](https://env-health.org/IMG/pdf/7-_Green_10_Briefing_for_the_European_Parliament_-_Nature_Health.pdf)
- Green 10. (2012a, November 9). *Open Letter to Prime Minister Tusk* [Open letter]. Retrieved from <https://www.env-health.org/IMG/pdf/green-10-letter-to-polish-prime-minister-donald-tusk.pdf>
- Green 10. (2012b, June). *Environmental track record: European Commission 2010-2012*. Retrieved from [https://www.foeeurope.org/sites/default/files/publications/20120703\\_commission\\_mid-term\\_review.pdf](https://www.foeeurope.org/sites/default/files/publications/20120703_commission_mid-term_review.pdf)
- Green 10. (2013, December 10). *Open Letter on a healthy environment for a good quality of life* [Open letter]. Retrieved from <https://bankwatch.org/wp-content/uploads/2014/01/Green10-letter-demandsEPelection-13Jan2014.pdf>
- Green 10. (2014a, September). *Why the European Parliament should block Jean-Claude Juncker's attempt to undermine the EU's environmental policies*. Retrieved from <http://www.env-health.org/IMG/pdf/g10appeal2ep-2.pdf>
- Green 10. (2014b, October 22). *Press Statement on Concerns remain over Juncker Commission's commitment to environment* [Press release]. Retrieved from <http://www.birdlife.org/sites/default/files/attachments/20141022%20Green%2010%20PR%20Juncker%20Commission%20FINAL.pdf>
- Green 10. (2014c, December 11). *PR about the open letter to VP Timmermans: "Do not kill laws crucial for our health, environment and the economy"* [Press release]. Retrieved from [https://www.birdlife.org/sites/default/files/attachments/2014.12.11PR\\_Green10\\_Air%26Waste.pdf](https://www.birdlife.org/sites/default/files/attachments/2014.12.11PR_Green10_Air%26Waste.pdf)
- Green 10. (2014d, December 16). *Axing of waste proposals and uncertainty about air a colossal, strategic blunder* [Press release]. Retrieved from <https://foeeurope.org/waste-air-quality-plans-europe-binned-161214>
- Green 10. (2014e, September 15). *Green 10 position on Transatlantic Trade and Investment Partnership* [Press release]. Retrieved from [http://env-health.org/IMG/pdf/201409\\_green10\\_position\\_ttip.pdf](http://env-health.org/IMG/pdf/201409_green10_position_ttip.pdf)
- Green 10. (2014f). *A New Impetus for Europe: Urgent Actions and Priorities for the new European Commission*. Retrieved from [http://awsassets.panda.org/downloads/20141031\\_g10\\_actions\\_priorities\\_juncker\\_commission.pdf](http://awsassets.panda.org/downloads/20141031_g10_actions_priorities_juncker_commission.pdf)

- Green 10. (2016, August 30). *Open letter on Green 10 priorities for Bratislava Informal Summit* [Open letter]. Retrieved from [http://www.birdlife.org/sites/default/files/bratislava\\_summit\\_green10\\_priorities.pdf#overlay-context=europe-and-central-asia/policy/nature-and-biodiversity](http://www.birdlife.org/sites/default/files/bratislava_summit_green10_priorities.pdf#overlay-context=europe-and-central-asia/policy/nature-and-biodiversity)
- Green 10. (2017a, April 21). *Open Letter to Commissioner for Environment, Maritime Affairs and Fisheries on revised standards for large combustion plants* [Open letter]. Retrieved from <http://www.caneurope.org/publications/letters-to-policy-makers/1365-letter-to-commissioner-for-environment-maritime-affairs-and-fisheries-on-revised-standards-for-large-combustion-plants>
- Green 10. (2017b, February 14). *Open Letter to implement Better Regulation principles in EU action on Endocrine Disrupting Chemicals* [Open letter]. Retrieved from <https://www.env-health.org/call-to-implement-better-regulation-principles-in-eu-action-on-endocrine-disrupting-chemicals/>
- Green 10. (2018, December 7). *Open Letter to First Vice-President Frans Timmermans on Protecting civil society in Germany* [Open letter]. Retrieved from <https://eeb.org/publications/113/categories/96574/letter-from-the-green-10-on-protecting-civil-society-in-germany.pdf>
- Green 10. (2019, February 12). *Open Letter on European Union's strategy for a non-toxic environment by 2018* [Open letter]. Retrieved from [https://www.env-health.org/wp-content/uploads/2019/02/12022019-EDCFree-Green-10-Letter-to-Martin-Selmayr\\_Non-toxic-environment-strategy\\_EN.pdf](https://www.env-health.org/wp-content/uploads/2019/02/12022019-EDCFree-Green-10-Letter-to-Martin-Selmayr_Non-toxic-environment-strategy_EN.pdf)
- Greenpeace EU Unit. (n.d.-a). About us. Retrieved March 22, 2020, from <https://www.greenpeace.org/eu-unit/about-us/>
- Greenpeace EU Unit. (n.d.-b). Our work. Retrieved March 22, 2020, from <https://www.greenpeace.org/eu-unit/our-work/>
- Greenpeace International. (n.d.). Who we are. Retrieved March 22, 2020, from <https://www.greenpeace.org/international/explore/about/>
- Haas, E. (2004). *Uniting Of Europe: Political, Social, and Economic Forces, 1950-1957 (Contemporary European Politics and Society)* (1st ed.). Retrieved from <https://www.europarl.europa.eu/100books/file/EN-H-BW-0038-The-uniting-of-Europe.pdf>
- Haas, Peter M. (1992). Introduction: epistemic communities and international policy coordination. *International Organization*, 46(1), 1–35. <https://doi.org/10.1017/s0020818300001442>
- Haas, P.M. (2001). Policy Knowledge: Epistemic Communities. In N. J. Smelser & P. B. Baltes (Eds.), *International Encyclopedia of Social & Behavioral Sciences* (1st ed., pp. 11578–11586). Retrieved from [https://polsci.umass.edu/file/931/download?token=\\_e-x6zDL](https://polsci.umass.edu/file/931/download?token=_e-x6zDL)
- Handy, F. (2001). Advocacy by environmental nonprofit organisations - An optimal strategy for addressing environmental problems? *International Journal of Social Economics*, 28(8), 648–666. <https://doi.org/10.1108/eum0000000005541>

- HEAL. (2018, September 18). WHAT WE DO. Retrieved March 23, 2020, from <https://www.env-health.org/about/what-we-do/>
- HEAL. (2019a, November 25). Members. Retrieved March 23, 2020, from <https://www.env-health.org/about/who-we-are/members/>
- HEAL. (2019b, December 2). ABOUT. Retrieved March 24, 2020, from <https://www.env-health.org/about/>
- Hildebrand, P. M. (2005). The European Community's Environmental Policy, 1957 to '1992': From Incidental Measures to an International Regime? In A. Jordan & C. Adelle (Eds.), *Environmental Policy in the EU: Actors, institutions and processes* (2nd ed., pp. 19–41). London, UK: Routledge.
- Hooghe, L. (2002). Multi-Level Governance in the European Union. In *Multi-Level Governance and European Integration* (pp. 1–32). New York, United States: Macmillan Publishers.
- Hooghe, Liesbet, & Marks, G. (2003). Unraveling the Central State, but How? Types of Multi-level Governance. *American Political Science Review*, 97(02), 233–243. <https://doi.org/10.1017/s0003055403000649>
- Institute for European Environmental Policy. (2019, July 22). Retrieved November 10, 2019, from <https://ieep.eu/news/what-should-be-the-priorities-of-the-new-european-commission-to-achieve-sustainable-europe-by-2030>
- International Council on Clean Transportation. (2014, January). *EU CO2 Emission Standards for Passenger Cars and Light-Commercial Vehicles*. Retrieved from [https://theicct.org/sites/default/files/publications/ICCTupdate\\_EU-95gram\\_jan2014.pdf](https://theicct.org/sites/default/files/publications/ICCTupdate_EU-95gram_jan2014.pdf)
- Jeffery, C. (1997). *The Regional Dimension of the European Union*. London, UK: Frank Cass.
- Junk, W. M. (2015). Two logics of NGO advocacy: understanding inside and outside lobbying on EU environmental policies. *Journal of European Public Policy*, 23(2), 236–254. <https://doi.org/10.1080/13501763.2015.1041416>
- Keck, Margaret E., & Sikkink, K. (1999). Transnational advocacy networks in international and regional politics. *International Social Science Journal*, 51(159), 89–101. <https://doi.org/10.1111/1468-2451.00179>
- Keck, M.E., & Sikkink, K. (1998). Transnational Advocacy Networks in the Movement Society. In S. Tarrow & D. S. Meyer (Eds.), *The Social Movement Society* (pp. 217–238). Retrieved from [https://scholar.harvard.edu/files/ksikkink/files/social\\_movement\\_society\\_sikkink.pdf](https://scholar.harvard.edu/files/ksikkink/files/social_movement_society_sikkink.pdf)
- Klüver, H. (2012a). Biasing Politics? Interest Group Participation in EU Policy-Making. *West European Politics*, 35(5), 1114–1133. <https://doi.org/10.1080/01402382.2012.706413>

- Klüver, H. (2012b). Informational Lobbying in the European Union: The Effect of Organisational Characteristics. *West European Politics*, 35(3), 491–510. <https://doi.org/10.1080/01402382.2012.665737>
- Klüver, H., Braun, C., & Beyers, J. (2015). Legislative lobbying in context: towards a conceptual framework of interest group lobbying in the European Union. *Journal of European Public Policy*, 22(4), 447–461. <https://doi.org/10.1080/13501763.2015.1008792>
- Klüver, H., Mahoney, C., & Opper, M. (2015). Framing in context: how interest groups employ framing to lobby the European Commission. *Journal of European Public Policy*, 22(4), 481–498. <https://doi.org/10.1080/13501763.2015.1008550>
- Kulin, J., & Johansson Sevä, I. (2019). The Role of Government in Protecting the Environment: Quality of Government and the Translation of Normative Views about Government Responsibility into Spending Preferences. *International Journal of Sociology*, 49(2), 110–129. <https://doi.org/10.1080/00207659.2019.1582964>
- Lindberg, L. N., & Scheingold, S. A. (1970). Europe's Would-Be Polity: Patterns of Change in the European Community. *The ANNALS of the American Academy of Political and Social Science*, 186–187. <https://doi.org/10.1177/000271627039200117>
- Marks, G., Hooghe, L., & Blank, K. (1996). European Integration from the 1980s: State-Centric v. Multi-level Governance. *JCMS: Journal of Common Market Studies*, 34(3), 341–378. <https://doi.org/10.1111/j.1468-5965.1996.tb00577.x>
- Mazey, S., & Richardson, J. (1992). Environmental groups and the EC: Challenges and opportunities. *Environmental Politics*, 1(4), 109–128. <https://doi.org/10.1080/09644019208414048>
- Michaelowa, A. (1998). Impact of interest groups on EU climate policy. *European Environment*, 8(5), 152–160. Retrieved from [https://doi.org/10.1002/\(SICI\)1099-0976\(199809\)8:5<152::AID-EET165>3.0.CO;2-A](https://doi.org/10.1002/(SICI)1099-0976(199809)8:5<152::AID-EET165>3.0.CO;2-A)
- Michalowitz, I. (2007). What determines influence? Assessing conditions for decision-making influence of interest groups in the EU. *Journal of European Public Policy*, 14(1), 132–151. <https://doi.org/10.1080/13501760601072719>
- Millennium Ecosystem Assessment. (2005). *Ecosystems and Human Well-being: A Report of the Millennium Ecosystem Assessment*. Retrieved from <https://www.millenniumassessment.org/documents/document.356.aspx.pdf>
- Moga, T. L. (2009). The Contribution of the Neofunctionalist and Intergovernmentalist Theories to the Evolution of the European Integration Process. *Journal of Alternative Perspectives in the Social Sciences*, 1(3), 796–807. Retrieved from [https://www.japss.org/upload/14.\\_Mogaarticle.pdf](https://www.japss.org/upload/14._Mogaarticle.pdf)
- Moravcsik, A. (1991). Negotiating the Single European Act: national interests and conventional statecraft in the European Community. *International Organization*, 45(1), 19–56. <https://doi.org/10.1017/s0020818300001387>



- Naturefriends International. (n.d.). Mission Statement . Retrieved March 24, 2020, from <https://www.nf-int.org/en/about-us/mission-statement>
- Naturefriends International. (2017). *Statutes of Naturefriends International (NFI)*. Retrieved from [https://www.nf-int.org/sites/default/files/2018-08/Statutes\\_NFI\\_2017\\_EN.pdf](https://www.nf-int.org/sites/default/files/2018-08/Statutes_NFI_2017_EN.pdf)
- Newig, J., & Fritsch, O. (2009). Environmental governance: participatory, multi-level - and effective? *Environmental Policy and Governance*, 19(3), 197–214. <https://doi.org/10.1002/eet.509>
- Peters, B. G., & Pierre, J. (2001). Developments in intergovernmental relations: towards multi-level governance. *Policy & Politics*, 29(2), 131–135. <https://doi.org/10.1332/0305573012501251>
- Piattoni, S. (2009). Multi-level Governance: a Historical and Conceptual Analysis. *Journal of European Integration*, 31(2), 163–180. <https://doi.org/10.1080/07036330802642755>
- Raustiala, K., & Bridgeman, N. (2007). Nonstate Actors in the Global Climate Regime. *SSRN Electronic Journal*, 3. <https://doi.org/10.2139/ssrn.1028603>
- Rhodes, C., & Mazey, S. (Eds.). (1995). *Building a European Polity?* New York, United States: Macmillan Publishers.
- Rhodes, R. A. W. (2000). Governance and Public Administration. In J. Pierre (Ed.), *Debating Governance: Authority, Steering, and Democracy* (pp. 54–90). Retrieved from [https://www.researchgate.net/profile/R\\_A\\_W\\_Rhodes/publication/246335680\\_Governance\\_and\\_Public\\_Administration/links/5a11be7d458515cc5aa9c6a9/Governance-and-Public-Administration.pdf](https://www.researchgate.net/profile/R_A_W_Rhodes/publication/246335680_Governance_and_Public_Administration/links/5a11be7d458515cc5aa9c6a9/Governance-and-Public-Administration.pdf)
- Rosenau, J. N. (1997). Along the Domestic-Foreign Frontier: Exploring Governance in a Turbulent World. *Political Science Quarterly*, 113(3), 522. <https://doi.org/10.1017/CBO9780511549472>
- Rozbicka, P. (2013). Advocacy coalitions: influencing the policy process in the EU. *Journal of European Public Policy*, 20(6), 838–853. <https://doi.org/10.1080/13501763.2013.781820>
- Sabatier, P. A. (1998). The advocacy coalition framework: revisions and relevance for Europe. *Journal of European Public Policy*, 5(1), 98–130. <https://doi.org/10.1080/13501768880000051>
- Sabatier, P., & Jenkins-Smith, H. (1999). The Advocacy Coalition Framework: An Assessment. In P. Sabatier (Ed.), *Theories of the Policy Process* (1st ed., pp. 117–166). Boulder, US: Westview Press.
- Sabatier, P., & Weible, C. M. (2007). The Advocacy Coalition Framework: Innovations and Clarifications. In P. Sabatier (Ed.), *Theories of the Policy Process* (pp. 189–220). Retrieved from

<https://edwardwimberley.com/courses/IntroEnvPol/theorypolprocess.pdf#page=195>

- Schepers, D. H. (2006). The Impact of NGO Network Conflict on the Corporate Social Responsibility Strategies of Multinational Corporations. *Business & Society*, 45(3), 282–299. <https://doi.org/10.1177/0007650306289386>
- Scott, S. G., & Lane, V. R. (2000). A Stakeholder Approach to Organizational Identity. *Academy of Management Review*, 25(1), 43–62. <https://doi.org/10.5465/amr.2000.2791602>
- Snvdholtz, W. (1996). Membership Matters: Limits of the Functional Approach to European Institutions\*. *JCMS: Journal of Common Market Studies*, 34(3), 403–429. <https://doi.org/10.1111/j.1468-5965.1996.tb00579.x>
- Stenmarck, Å., Jensen, C., Quedsted, T., & Moates, G. (2016, March). *Estimates of European food waste levels*. Retrieved from <http://www.eufusions.org/phocadownload/Publications/Estimates%20of%20European%20food%20waste%20levels.pdf>
- Stewart, J. D. (1958). *British Pressure Groups: Their Role in Relation to the House of Commons*. Oxford, UK: Clarendon Press.
- Stone, D. (2002). Introduction: global knowledge and advocacy networks. *Global Networks*, 2(1), 1–12. <https://doi.org/10.1111/1471-0374.00023>
- Şekercioğlu, S. (2016). *The Evolution of the European Union Climate Change Policy and The Civil Society Organisations* (Doctoral Dissertation). Retrieved from [https://tez.yok.gov.tr/UlusalTezMerkezi/TezGoster?key=DPTyuy3wRPq\\_qvCPSqUB61wcFezW3TgDS4Ri9oLjS-UYPmtXyFRgrJhhLIRcyo4c](https://tez.yok.gov.tr/UlusalTezMerkezi/TezGoster?key=DPTyuy3wRPq_qvCPSqUB61wcFezW3TgDS4Ri9oLjS-UYPmtXyFRgrJhhLIRcyo4c)
- Tallberg, J., Dellmuth, L. M., Agné, H., & Duit, A. (2015). NGO Influence in International Organizations: Information, Access and Exchange. *British Journal of Political Science*, 48(1), 213–238. <https://doi.org/10.1017/s000712341500037x>
- Transparency Register. (2020, May 30). The List of Meetings of Green 10. Retrieved May 30, 2020, from <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=70309834043-10&pdf=true>
- Transport & Environment. (n.d.). About us. Retrieved March 27, 2020, from <https://www.transportenvironment.org/about-us>
- UNFCCC. (n.d.). Admitted NGOs in UNFCCC. Retrieved March 3, 2020, from <https://unfccc.int/process/parties-non-party-stakeholders/non-party-stakeholders/admitted-ngos/list-of-admitted-ngos>
- United Nations. (1972, December 15). Resolutions adopted on the reports of the Second Committee. Retrieved February 7, 2020, from [https://undocs.org/en/A/RES/2997\(XXVII\)](https://undocs.org/en/A/RES/2997(XXVII))
- United Nations. (1998, June 25). Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

Retrieved May 5, 2020, from  
<https://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf>

United Nations Civil Society Participation. (n.d.). All organisations in consultative status to ECOSOC. Retrieved March 2, 2020, from  
<https://esango.un.org/civilsociety/getByAllHavingStatus.do?method=getByAllHavingStatus&searchType=csSearch>

Weale, A. (1996). Environmental rules and rule-making in the European Union. *Journal of European Public Policy*, 3(4), 594–611.  
<https://doi.org/10.1080/13501769608407055>

Weible, C. M., Sabatier, P. A., & McQueen, K. (2009). Themes and Variations: Taking Stock of the Advocacy Coalition Framework. *Policy Studies Journal*, 37(1), 121–140. <https://doi.org/10.1111/j.1541-0072.2008.00299.x>

World Bank. (2020, May 25). World Population. Retrieved May 25, 2020, from  
<https://data.worldbank.org/indicator/SP.POP.TOTL>

WWF EU. (n.d.-a). WWF in the EU. Retrieved March 28, 2020, from  
[https://www.wwf.eu:443/about\\_us/wwf\\_eu/](https://www.wwf.eu:443/about_us/wwf_eu/)

WWF EU. (n.d.-b). Climate & Energy. Retrieved March 28, 2020, from  
[https://www.wwf.eu:443/what\\_we\\_do/climate/](https://www.wwf.eu:443/what_we_do/climate/)

WWF EU. (n.d.-c). EU Affairs. Retrieved March 28, 2020, from  
[https://www.wwf.eu:443/what\\_we\\_do/eu\\_affairs/](https://www.wwf.eu:443/what_we_do/eu_affairs/)

Zito, A. R. (2001a). Epistemic communities, collective entrepreneurship and European integration. *Journal of European Public Policy*, 8(4), 585–603.  
<https://doi.org/10.1080/13501760110064401>

Zito, A. R. (2001b). Epistemic communities, European Union governance and the public voice. *Science and Public Policy*, 28(6), 465–476.  
<https://doi.org/10.3152/147154301781781183>

### Appendix.1

#### The List of Environmental Related Green (G) and White (W) Papers

No	Document Number	Title	Date
1	52000DC0769	Towards a European strategy for the security of energy supply (G)	2000
2	52000DC0469	Environmental issues of PVC (G)	2000
3	52000DC0087	GHG emissions trading within the EU (G)	2000
4	52001DC0135	The future of the common fisheries policy (G)	2001
5	52005DC0265	Energy Efficiency or Doing More With Less (G)	22.6.2005
6	52006DC0105	A European Strategy for Sustainable, Competitive and Secure Energy (G)	8.3.2006
7	52006DC0275(02)	Towards a future Maritime Policy for the Union : a European vision for the oceans and seas - "How inappropriate to call this planet Earth when it is quite clearly Ocean" attributed to Arthur C. Clarke (G)	7.6.2006
8	52007DC0354	From the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions - Adapting to climate change in Europe – options for EU action (G)	29.6.2007
9	52007SC1209	Towards a new culture for urban mobility (G)	25.9.2007
10	52008DC0811	The management of bio-waste in the EU (G)	3.12.2008

11	52008DC0782R(01)	Towards a secure, sustainable and competitive european energy network (G)	7.1.2009
12	52009DC0044	Towards a better integrated trans european transport network at the service of the common transport policy (G)	4.2.2009
13	52009DC0163	Reform of the Common Fisheries Policy (G)	22.4.2009
14	52010DC0066	Forest Protection and Information in the EU: Preparing forests for climate change (G)	1.3.2010
15	52013DC0169	A 2030 framework for climate and energy policies (G)	2013
16	52013DC0123	European Strategy on Plastic Waste in the Environment (G)	2013
17	51999DC0719	Food Safety (W)	12.1.2000
18	52000DC0066	Environmental Liability (W)	9.2.2000
19	52001DC0088	Strategy for a future Chemicals Policy (W)	27.2.2001
20	52001DC0370	European transport policy for 2010: time to decide (W)	12.9.2001
21	52009DC0147	Adapting to climate change: Towards a European framework for action (W)	1.4.2009
22	52006DC0105	Roadmap to a Single European Transport Area - Towards a competitive and resource efficient transport system (W)	28.3.2011

**Source:** Author's compilation from the official website of EUR-Lex

**Appendix.2**  
**The List of Documents that Published by Green 10**  
**between 1999 and mid-2019**

<b>No</b>	<b>Title of the Document</b>	<b>Type</b>	<b>Date</b>
<b>1</b>	How green is the Prodi Commission?: The Green 8 Environmental Mid-Term Review	Report	07.2002
<b>2</b>	One year to go: The 2003 Green 8 review of the European Commission's environmental policies	Report	2003
<b>3</b>	Towards a Green EU Constitution: Greening the European Convention Proposal	Report	2003
<b>4</b>	Defending the Environmental Dimension	Open Letter	02.2003
<b>5</b>	Key concerns about Constitution	Open Letter	09.05.2003
<b>6</b>	Objective of Sustainable Development (Article I-3)	Open Letter	29.05.2003
<b>7</b>	Participatory Democracy and Access to Justice (Article I-46 and III-266)	Open Letter	29.05.2003
<b>8</b>	The European Convention: Green 8 summary briefing	Policy Proposal	31.05.2003
<b>9</b>	The European Convention: Green 8 Assessment	Position Paper	16.06.2003
<b>10</b>	European Council at Thessaloniki, The results of the Convention: improvements needed as well as substantial extension with a revised mandate	Open Letter	16.06.2003
<b>11</b>	Amending Part III - Green 8 Proposals	Policy Proposal	17.06.2003
<b>12</b>	Environmental Manifesto for European	Manifesto	2004

	Elections 2004		
<b>13</b>	Corporate Social Responsibility & The EU Multi-Stakeholder Forum Process	Policy Proposal	2004
<b>14</b>	Green Eight Review of the EU Sustainable Development Strategy	Report	08.2004
<b>15</b>	To Do list for the Barroso Commission	Policy Proposal	25.01.2005
<b>16</b>	The Environmental Challenges for the Financial Perspectives 2007-2013	Policy Proposal	02.02.2005
<b>17</b>	Letter to President Barroso	Open Letter	01.07.2005
<b>18</b>	On your agenda Jul 20: Thematic Environmental Strategies	Open Letter	12.07.2005
<b>19</b>	Reducing the climate change impact of aviation	Open Letter	23.09.2005
<b>20</b>	Lobbying in the EU	Position Paper	22.02.2006
<b>21</b>	A programme for the Sustainable Development of the European Union	Report	03.2006
<b>22</b>	A programme for the Sustainable Development of the EU	Policy Proposal	04.2006
<b>23</b>	10 Simple Steps to Help Halt Biodiversity Loss by 2010	Position Paper	05.2006
<b>24</b>	Call for Adoption by European Council of new Sustainable Development Strategy	Open Letter	09.06.2006
<b>25</b>	EU Action Plan on Environment and Health	Open Letter	19.06.2006
<b>26</b>	Contribution to the Green Paper on the Transparency Initiative	Policy Proposal	08.2006
<b>27</b>	Reducing CO2 emissions from light duty	Open Letter	23.01.2007

	vehicles		
<b>28</b>	Green groups deliver critical mid-term review of Barroso Commission	Press Statement	27.04.2007
<b>29</b>	'Could Try Harder' A mid-term report on the European Commission's environmental record	Report	04.2007
<b>30</b>	Face the future EU	Position Paper	01.06.2007
<b>31</b>	Ten Green Principles for the EU Budget Review	Policy Proposal	2007
<b>32</b>	An Environmental Roadmap for 2009-2014 The Role of the European Parliament	Manifesto	09.2008
<b>33</b>	Off target - European Commission 2004-2009 Environmental Progress Report and Lessons for the Next Commission	Report	06.2009
<b>34</b>	Climate Change-Green 10 Briefing for the European Parliament	Policy Proposal	6-8.10.2009
<b>35</b>	Nature & Health-Green 10 Briefing for the European Parliament	Policy Proposal	6-8.10.2009
<b>36</b>	Sustainability - Our vision for a new EU budget	Policy Proposal	2011
<b>37</b>	Environmental track record: European Commission 2010-2012	Report	06.2012
<b>38</b>	No title (Prime Minister of Poland about the ClientEarth)	Open Letter	09.11.2012
<b>39</b>	On your agenda Jul 20: Thematic Environmental Strategies	Open Letter	14.11.2012
<b>40</b>	Green 10 Priorities for Bratislava Informal Summit	Open Letter	17.10.2013



<b>41</b>	A healthy environment for a good quality of life	Manifesto	12.2013
<b>42</b>	New Commission sidelining environment	Open Letter	11.09.2014
<b>43</b>	Why the European Parliament should block Jean-Claude Juncker's attempt to undermine the EU's environmental policies	Policy Proposal	12.09.2014
<b>44</b>	Green 10 appeals to the European Parliament to block the Juncker Commission in its current structure and put forward a list of formal requests.	Press Statement	15.09.2014
<b>45</b>	Transatlantic Trade and Investment Partnership	Position Paper	09.2014
<b>46</b>	Better Regulation and the Rule of Law in the President elect's Jean Claude Juncker Commission	Open Letter	29.09.2014
<b>47</b>	European Parliament should reject Juncker's environmentally unsustainable Commission	Press Statement	07.10.2014
<b>48</b>	Incoming European Commission must heed EU citizens' call for a sustainable economy and environmental protection	Open Letter	16.10.2014
<b>49</b>	President-elect Juncker ignores EU citizens and Parliament's call for a sustainable economy and environmental protection	Open Letter	16.10.2014
<b>50</b>	President-elect Juncker must do more than a vague commitment to "sustainability"	Policy Proposal	2014
<b>51</b>	Concerns remain over Juncker Commission's commitment to environment	Press Statement	22.10.2014
<b>52</b>	A new Impetus for Europe: urgent actions and priorities for the new European Commission	Press Statement	03.11.2014

<b>53</b>	Possible withdrawal of air and waste proposals and absence of sustainability	Open Letter	11.12.2014
<b>54</b>	About the open letter to VP Timmermans	Press Statement	11.12.2014
<b>55</b>	Axing of waste proposals and uncertainty about air a colossal, strategic blunder	Press Statement	16.12.2014
<b>56</b>	State of the EU after Brexit: time for a new direction	Open Letter	27.06.2016
<b>57</b>	Green 10 Priorities for Bratislava Informal Summit	Open Letter	30.08.2016
<b>58</b>	No title (about the Comprehensive Economic and Trade Agreement)	Open Letter	13.02.2017
<b>59</b>	Call to implement Better Regulation principles in EU action on Endocrine Disrupting Chemicals (EDCs)	Open Letter	14.02.2017
<b>60</b>	Letter to Commissioner for Environment, Maritime Affairs and Fisheries on revised standards for large combustion plants	Open Letter	21.04.2017
<b>61</b>	Protecting Civil Society in Germany	Open Letter	07.12.2018
<b>62</b>	2019 European Parliament Election Manifesto	Manifesto	2019
<b>63</b>	EU's strategy for a non-toxic environment by 2018	Open Letter	12.02.2019

### Appendix.3

#### The List of Consultations that Green 10 Members Contributed

No	Title of the Consultations	Respond/s from
1	EU initiative for pollinators	BirdLife, EEB, FoEE, WWF
2	EU funds in the area of investment, research & innovation, SMEs and single market	Bankwatch, WWF
3	EU implementation of the Aarhus Convention in the area of access to justice in environmental matters	BirdLife, CAN, EEB, FoEE, Greenpeace, WWF
4	Evaluation of the 7th Environment Action Programme	EEB, HEAL, WWF
5	Evaluation of the EU's Strategy on Adaptation to Climate Change	CAN
6	Heavy-Duty Vehicles (HDVs) CO2 emission standards	T&E
7	Stepping up EU action against Deforestation and Forest Degradation	BirdLife, CAN, Greenpeace, T&E, WWF
8	The Establishment of the Innovation Fund	T&E, WWF
9	The revision of the policy on monitoring, reporting and verification of CO2 emissions from maritime transport	T&E
10	Towards an EU Product Policy Framework contributing to the Circular Economy	EEB, HEAL
11	Evaluation of Food Contact Materials	EEB, HEAL
12	Evaluation of the Industrial Emissions Directive	CAN, EEB
13	Fitness Check of the Water Framework Directive	EEB, WWF
14	Restriction of hazardous substances	EEB

15	Strategy for long-term EU greenhouse gas emissions reductions	CAN, CEE Bankwatch, EEB, Greenpeace, WWF, T&E
16	The revision of the Vehicle General Safety Regulation and the Pedestrian Safety Regulation	T&E
17	Emission Trading System (ETS) post-2020 carbon leakage provisions	CAN, Greenpeace, WWF
18	Market-based measures to reduce the climate change impact from international aviation	CAN, T&E, WWF
19	Revision of the EU Emission Trading System (EU ETS) Directive	CAN, EEB, T&E, WWF
20	Support the evaluation of the car labelling Directive	T&E
21	The Revision of Regulation (EU) No 443/2009 and Regulation (EU) No 510/2011 setting CO2 emission performance standards for light duty vehicles	T&E
22	The preparation of legislation on monitoring / reporting of Heavy-Duty Vehicle fuel consumption and CO2 emission	T&E
23	The EU approach against Wildlife Trafficking	BirdLife, WWF
24	The future EU initiative on No Net Loss of biodiversity and ecosystem services.	BirdLife, EEB, FoEE, WWF
25	Preparation of a sustainable bioenergy policy for the period after 2020	BirdLife, CAN, Greenpeace
26	The regulatory fitness of chemicals legislation (excluding REACH)	EEB
27	On potential measures to improve the implementation of	T&E

	certain aspects of the Directive on end-of life vehicles, with emphasis on ELVs of unknown whereabouts	
28	Progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework	CAN, EEB, WWF
29	EU strategy for liquefied natural gas and gas storage	CAN
30	A new Energy Market Design	CAN, Greenpeace, WWF
31	Preparation of a new Renewable Energy Directive for the period after 2020	BirdLife, CAN, EEB, Greenpeace, T&E
32	Evaluation of the fisheries control regulation	Greenpeace, WWF
33	European Fisheries Fund (EFF) ex-post evaluation and the possible future European Maritime and Fisheries Fund (EMFF) after 2020	BirdLife, Greenpeace, WWF
34	Multiannual plan for the fisheries exploiting demersal stocks in the Western Mediterranean Sea	BirdLife
35	Revision of the ETS State aid Guidelines	CAN
36	European Partnership for Clean Hydrogen	T&E
37	Legislation on end-of-life vehicles - evaluation	EEB
38	Block-exempted aid in the fishery and aquaculture sector	WWF
39	Amendment to the State aid Guideline for fisheries	WWF

**Source:** Author's own compilation based on data from EU Consultations

#### Appendix.4

### The Timeline of Major Environmental Developments in Europe between 1950s and 1990s

**1957** 'The six' extend their cooperation to other economic sectors. They sign the Treaty of Rome, creating the European Economic Community (EEC) or the 'Common Market'.

**1957** The first significant nuclear accident occurred in October at Windscale in northern England.

**1960** The EEC launched its Common Agricultural Policy. To date it still accounts for about 45% of the EU budget.

**1962** The book Silent Spring by Rachel Carson alerts a large audience to the environmental and human dangers of pesticides. It sparks the environmental movement.

**1963** Signing of the Berne Accord, a transboundary cooperation to protect the River Rhine.

**1967** Directive on classification, packaging and labelling of dangerous substances.

**1972** The United Nations Conference on the Human Environment is held in Stockholm. This leads to the creation of government environment agencies and the UN Environment Programme.

**1972** EU environmental policy was formally founded through the European Council declaration made in Paris in October 1972.

**1972** The EU adopts its first Environment Action Programme, based on the ideas that prevention is better than cure and the 'polluter pays' principle. The first environment ministries are established.

**1972** The Club of Rome publishes The Limits to Growth. It stresses, for the first time, the importance of the environment, and the essential links with population and energy.

**1975** The Community started building its body of environmental legislation on the Waste Framework Directive, the Bathing Water Directive and the Birds Directive.

**1979** A partial meltdown of the Three Mile Island nuclear plant in the USA puts the future of nuclear energy in question.

**1979** The first World Climate Conference took place in February in Geneva, Switzerland. A panel on climate change set up by the National Academy of Sciences in the USA advises that 'A wait-and-see policy may mean waiting until it is too late' to avoid significant climate changes.

**1980+** The EU continues to build the main body of its environmental legislation such as the Environmental Impact Assessment Directive

**1981** The European Commission creates its Environment Directorate-General.

**1983** The UNECE (United Nations Economic Commission for Europe) Convention on Long-range Transboundary Air Pollution enters into force.

**1985** The European Commission establishes the Corine programme (Coordination of Information on the Environment), the first European-wide system for environmental data collection. This will later inspire the creation of the European Environment Agency.

**1985** First observation of an ozone hole over Antarctica.

**1986** On 25 April, an uncontrolled chain reaction in a reactor in the Chernobyl nuclear power plant blew off the reactor's lid. A plume of radioactive fall-out drifts over western Soviet Union, eastern and western Europe, and eastern North America.

**1987** The Brundtland Commission's report, Our Common Future, defines sustainable development as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'

**1987** The Single European Act incorporates environmental protection into the Treaty of Rome. The year is designated as the European Year of the Environment.

**1987** The UN adopts the Montreal Protocol, which commits the signatory countries to phase out, by 2000, substances that deplete the ozone layer in the atmosphere.

**1988** The International Panel on Climate Change (IPCC) is established by the World Meteorological Organisation and UNEP. Its aims are to review scientific research and provide governments with advice on climate problems.

**1990** A Council Regulation is issued establishing the European Environment Agency and the European environment information and observation network (Eionet).

**1990 +** Adoption of, among others, the Urban Waste Water Treatment Directive (1991), the Habitats Directive (1992), the Packaging and Packaging Waste Directive (1994), the Air Quality Framework Directive (1996), and the Integrated Pollution Prevention Control Directive (1996).

**1992** At the UN summit on the environment and development in Rio de Janeiro, the Agenda 21 programme is adopted. The Community and its Member States signed the UN Framework Convention on Climate Change and the Convention on Biodiversity.

**1992** The EU's 5th Environment Action Programme puts integration of the environment into other policy areas at its core, signalling a shift from purely regulatory measures to an emphasis on economic and fiscal measures.

**1994** The European Environment Agency set up an office in Copenhagen in 1994. It aims to provide independent, reliable and comparable environmental information for decision-makers and the public.

**1994** The first genetically modified food crop is released on the market. It remains a strongly controversial environmental issue.

**1995-96** The EEA published its first pan-European state of the environment report, the 'Dobris' report and first report on environmental taxes.

**1997** The Kyoto Protocol was adopted in Kyoto, Japan, on 11 December. It sets specific targets and deadlines to reduce global greenhouse gas emissions.

**1998** The UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the 'Aarhus Convention') is adopted at the Fourth Ministerial Conference in the 'Environment for Europe' process.

**1999** The Amsterdam Treaty enters into force, requiring that environmental protection be integrated in the definition and implementation of Community policies and activities, with a view to promoting sustainable development.

**Source:** European Environment Agency