

TAKING THE TEMPERATURE OF THE EUROPEAN GREEN DEAL

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GREEN DEAL



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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

The European Green Deal (EGD) aims to make Europe climate neutral by 2050 while ensuring a just transition for all. However, the EGD's high level of ambition and broad scope is not adequately reflected in member states' commitments, and interest groups attempt to shape the EGD according to their preferences. Given these circumstances, how can the promise of a green and just European Green Deal be realised? To shed light on this research question, we build on insights from political economy on the influence of interest groups in policymaking. Analytically, we propose a framework that integrates distinct sources of power (structural vis-à-vis instrumental) and a range of political strategies (quiet vis-à-vis noisy politics). Empirically, we study two cases central to the EGD: the 'EU Biodiversity Diversity Strategy for 2030' to protect nature and ecosystems; and the 'Hydrogen Strategy' to power a climate-neutral economy. Based on lobbying activities with members of the European Commission and the European Parliament, we identify key stakeholders, their framing, and strategies. Our findings have important implications for understanding the interplay of relevant actors and EU institutions and their influence on European policy.

INTRODUCTION

1. INTRODUCTION

The European Green Deal (EGD), unveiled in December 2019, is the flagship initiative of the von der Leyen Commission that aims to make Europe climate neutral by 2050 while ensuring a just transition for all (European Commission 2019a, 2019b). However, the EGD's high level of ambition and broad scope – encompassing issues ranging from sustainable agriculture to zero-pollution environments, and from greening energy to renovating the building stock across Europe – is not adequately reflected in member states' commitments (Wildauer, Leitch and Kapeller 2020). It is also subject to lobbying from well-resourced and well-connected interest groups, including fossil fuel companies (Corporate Europe Observatory 2020). Understandably, the pandemic put the roll-out of the EGD initiatives temporarily on hold, but commitments under the recovery package, the NextGenerationEU fund, underlines the commitments to a green transition. Nonetheless, the severity and urgency of the climate crisis mean the aim should be not just to restore the European economy post-Covid, but also to do so in a climate-friendly way. The notion of 'build back better' cannot be an empty signifier. Given these circumstances, how can the promises of a green and just European Green Deal be realised?

To shed light on this research question, we draw on the literature of interest group influence and study two cases central to the EGD to map key stakeholders, their resources, and strategies: (1) the 'EU Biodiversity Diversity Strategy for 2030' to protect nature and ecosystems; and (2) the 'Hydrogen Strategy' to power a climate-neutral economy. Based on the EU's lobby register (Integrity Watch EU 2021), we identify the lobbying activities of interest groups with senior officials of the European Commission and the European Parliament. Subsequently, we examine the most active actors in terms of their framing and objectives. Our study therefore takes the temperature of the EGD's progress by examining the influence of actors at the EU level who shape the

EGD. In doing so, our research offers civil society actors, policymakers, and academics insights into how to drive an ambitious and just green transition across the EU for the EGD and the 'Fit for 55' package.

The remainder of this study is structured as follows. In Section 2, we give a brief overview of the EGD and highlight its broad scope, media coverage, and relevance to lobbyists. In Section 3, we introduce our theoretical framework on interest group influence in the European Union. We discuss our two cases, biodiversity and hydrogen, in Sections 4 and 5 respectively. The final two sections discuss our findings and conclude by laying out our policy recommendations.

WHAT IS THE EUROPEAN GREEN DEAL AND HOW IS IT DISCUSSED?

2. WHAT IS THE EUROPEAN GREEN DEAL AND HOW IS IT DISCUSSED?

The EGD is the result of historical, scientific, and political processes. It serves both as a narrative for the Commission to kick-start the green transition across the EU and as a framework for specific political initiatives across a range of EU policy areas. It is embedded in the European institutional architecture: for example, the Farm to Fork Strategy extends and repurposes the Common Agricultural Policy (CAP) (Schebesta and Candel 2020) and the Biodiversity Strategy is building on the existing Birds and Habitats Directive (European Commission 2020b).

As Table 1 indicates, the EGD spans a broad range of issues that encompass not only multiple policy areas, but also a host of policy instruments – motivated by different interests and needs of the European people. Clearly, the EGD has consequences for how millions of European people conduct their daily lives: how to heat their homes; how to commute to work; how to eat healthily and sustainably; or how to spend their leisure time.

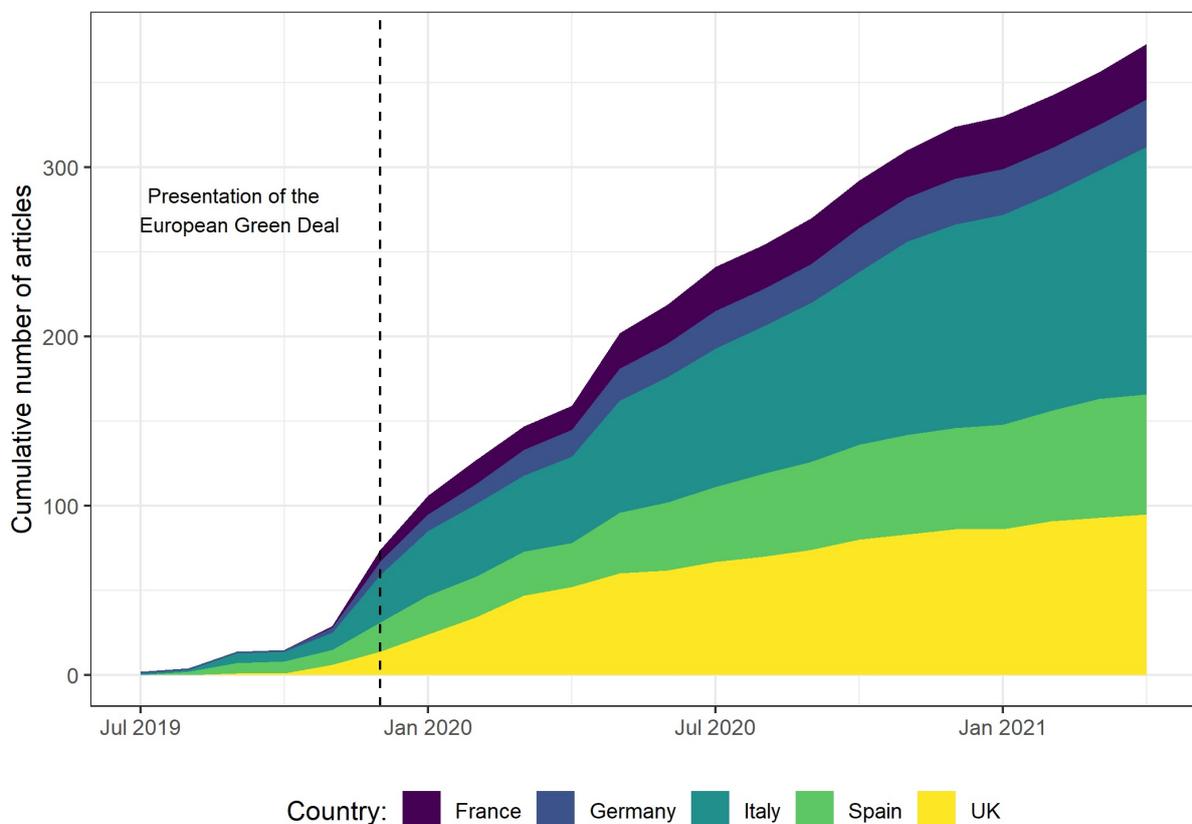
Table 1: The European Green Deal: an example of policy areas and instruments

Policy area	Policy instrument	Rationale
Biodiversity	Action Plan for Organic Farming for 2021-2026	Producing high-quality food with low environmental impact, as part of sustainable food systems for the EU.
	Extension of protected and restored natural areas	At least 30% of land and 30% of sea that should be protected in the EU (forests, marine areas, carbon-rich ecosystems and fight against invasive species).
	Promote an international natural capital accounting initiative	Allow countries to better account for biodiversity and ecosystems in national economic planning and policy decision-making – extending the framework beyond GDP.
Hydrogen	Develop an investment agenda, within the European Clean Hydrogen Alliance	Stimulate the roll-out of production and use of hydrogen and build a concrete pipeline of projects in Europe.
	Explore support measures, such as demand-side policies in end-use sectors	Nudge people to boost demand for renewable hydrogen energy.
Mobility	Strategy for sustainable and smart mobility	Set foundation for achieving a green and digital transformation of the EU transport system.
	Revise Directive on Combined Transport	Strengthen the only EU legal instrument that directly supports the shift from road freight to lower-emission transport modes.
Food policy	Revision of the pesticides statistics regulation	Overcome data gaps and reinforce evidence-based policymaking to ensure a sustainable food production.
	Harmonised mandatory front-of-pack nutrition labelling	Enable consumers to make health-conscious food choices, because unhealthy diets are a key determinant of health inequalities and impoverishment.
<p>Notes: Selected instruments of the European Green Deal that illustrate the broad scope of the initiative.</p>		

Testimony to this importance, the EGD also features prominently in public debate. In Figure 1, we depict the cumulative number of articles mentioning the EGD (based on keyword-search using 'European Green Deal' and the official translations by the European Union as keywords) in the two 'quality' newspapers with the largest circulation of five countries: France; Germany; Italy; Spain; and the

UK.¹ As expected, the newspaper coverage in all five countries picks up markedly around the official launch of the EGD (December 2019). From then, newspaper coverage increased steadily to a total of more than 300 articles on the subject by the end of April 2021, indicating the growing public interest and debate around the EGD.

Fig. 1: Media coverage of the EGD in selected European countries



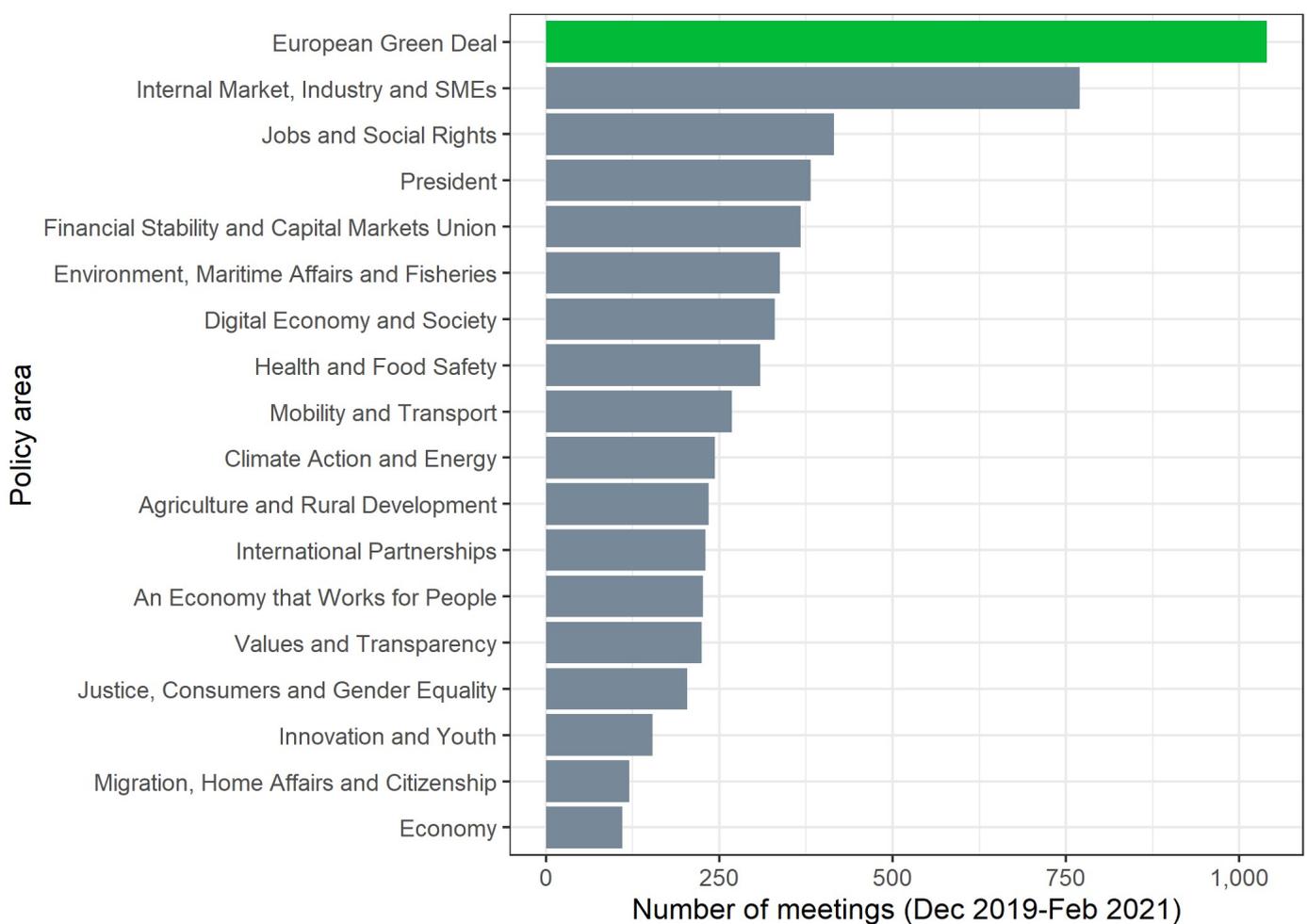
Notes: For each country, we identified the number of articles in the two biggest newspapers that covered the European Green Deal between 1 July 2019 and 30 April 2021 by keyword search.

¹ The newspapers selected are as follows: Le Figaro and Libération (France); Frankfurter Allgemeine Zeitung and Süddeutsche Zeitung (Germany); la Repubblica and Corriere della Sera (Italy); ABC and El País (Spain). As measured by population, the first four countries are the largest EU member states and also represent the major newspaper markets in the EU. We also included the UK because the two selected newspapers, the Financial Times and The Guardian, are widely read throughout Europe and remain important players in the debate on European public policy despite Brexit.

The increasing attention around the EGD is reflected not only in the media coverage, but also in lobbying efforts from industry and civil society. As depicted in Figure 2, the EGD is the policy area with the highest number of lobby meetings since the start of the von der Leyen Commission, according to data from Integrity Watch (Integrity Watch EU 2021). Further, policy areas related to the EGD agendas

(for example, Health and Food Safety, or Climate Actions and Energy) also rank high in terms of lobby meetings. Between December 2019 and February 2021, the EU's transparency register records 1,040 lobby meetings between senior officials of the European Commission and 590 lobby organisations (Integrity Watch EU 2021).

Fig. 2: Lobbying activities in the European Union



Data: Own calculation based on Integrity Watch EU (Integrity Watch EU 2021), which collects and publishes records of lobby meetings by senior officials of the European Commission, based on the EU's transparency register.

Notes: Number of lobby meetings depicted for all policy areas with at least 100 meetings with senior officials of the European Commission between 1 December 2019 and 25 February 2021.

In Figure 3, we visualise the number of EGD lobbying meetings by type of actor. Three groups dominate the landscape:

- Representatives of non - governmental organisations (NGOs) met 280 times with officials from the European Commission. Environmental NGOs such as Transport and Environment, WWF, the European Climate Foundation, or the European Environmental Bureau are most active in this regard.
- There were 288 meetings between corporate representatives and the European Commission on record. Here, in particular big oil companies

(such as Shell) or car manufacturers (such as Scania) are among the companies with the most meetings.

- Interest groups representing trade and business associations recorded 253 meetings, the most active of which are the European Chemical Industry Council and the European Automobile Manufacturers' Association.

Other types of actors lobbying on the EGD include research and academic institutions (86 meetings), trade unions (36 meetings), and actors at the municipal level (28 meetings).

Fig. 3: Lobbying activity in the EGD by type of actor



Data: Own calculation based on Integrity Watch EU (Integrity Watch EU 2021).

Notes: Number of lobby meetings with senior officials of the European Commission per lobby group type between 1 December 2019 and 25 February 2021. Type of lobby group identified based on the EU's transparency register.

Given the broad scope of the EGD, its increasing coverage in the media, and the variegated lobbying activities, we believe it is pertinent to examine how

interest groups influence the design of the EGD, and whether these stakeholders enable or impede a 'green and just transition'.

HOW DO INTEREST GROUPS SHAPE THE EUROPEAN GREEN DEAL?

3. HOW DO INTEREST GROUPS SHAPE THE EUROPEAN GREEN DEAL?

Although its objectives are guided by climate science, the design of the EGD's initiatives is very much subject to influence by interest groups – ranging from business to unions, and from civil society organisations to voters – who lobby decision-makers to achieve their preferences. This is a result of the Community method used in the EU, where the Commission invites experts to provide input to new legislation, and members of the Parliament (MEPs) invite experts as they amend legislation in Parliament. This ensures a pluralistic approach, but it risks that actors with the most resources are able to speak with the loudest voice. Against this background we ask: which strategies do interest groups employ to shape the EGD? And how do interest groups challenge the EU to deliver on a green and just transition?

To answer these questions, we build on the literature on interest group influence. Specifically, we distinguish between two forms of power:²

- Structural power is a trait of political actors that occupy a powerful structural position in national and international policymaking because states (and politicians) depend on them for their success. For example, capital has structural power because it is essential to economic growth (Emmenegger 2015).
- Instrumental power refers to different strategies that political actors actively pursue in order to influence policymakers, such as lobbying or campaign donations.

Structural and instrumental power are analytically distinct; empirically, they may be difficult to disentangle due to observational equivalence (Culpepper 2015; Emmenegger 2015). For example, if the EGD does not mandate a shift from fossil fuels to renewable energy, is that due to the potential disinvestment effects (structural power), also known as capital strikes (Young, Banerjee and Schwartz 2018), or due to the successful lobbying of these industries, for example by highlighting the adverse employment effects (instrumental power)? Thus, structural power implies that decision-makers may 'anticipate' preferences. Instrumental power manifests in a range of political strategies, which are often captured in the literature by the dichotomy of 'quiet vs noisy politics' (Culpepper 2010; Kastner 2018; Keller 2018). The former, quiet politics, 'seeks influence by providing empirical evidence and expert knowledge on the potential favourable or otherwise implications of a given policy' (Keller 2018). For instance, political actors may conduct (or finance) independent research to understand the consequences of biodiversity loss in Europe. This type of strategy is most often out of public sight, with expert knowledge targeted directly at policymakers, thus the name 'quiet politics'. The latter, noisy politics, 'focuses on the political or electoral consequences of a policy' (Keller 2018). That is, actors highlight the potentially disruptive effects for employment in the energy sector when lobbying against more progressive energy policies, often with the explicit aim to attract broader attention.

² These two powers are neither mutually exclusive nor collectively exhaustive. Indeed, with technological advances, new forms of power may be emerging (Culpepper and Thelen 2020). However, in the context of the European Green Deal, we argue that structural and instrumental power are most relevant.

In short, interest groups seeking to influence EU policymaking can do so drawing on structural or instrumental power. In the case of instrumental power, a number of strategies ranging from 'quiet' to 'noisy' business politics are available. One way or another, interest groups therefore try to convey their preferences to decision-makers, who, in turn, shape two aspects of the EGD. On the one hand, the narrative of the EGD is an account of how the EU sets out to comprehensively tackle climate change. On the other hand, the practice of the EGD is concerned with how policies and regulations are implemented.

For our study, we select two cases central to the EGD: (1) the 'EU Biodiversity Diversity Strategy for 2030' and (2) the 'Hydrogen Strategy'. The two cases are 'most different' cases (Seawright and Gerring 2008) in terms of the actors involved and the historical trajectory. Biodiversity enjoys a long history of EU legislation; accordingly, it has been included in the EGD from the outset. By contrast, hydrogen has entered EU policy circles in more recent years and has since been adopted to the EGD framework. For each of these cases, we map stakeholders based on the lobbying activities of interest groups with members of the European Commission and European Parliament. Subsequently, we identify the key stakeholders and examine their framing³ and objectives in more detail.⁴

3 Framing refers to a process of selecting and highlighting some aspects of a perceived reality and make them more salient in communication. There are various ways of and strategies for framing that typically include the selection of a particular problem definition, certain causal interpretations, specific or implied moral evaluations, and/or specific recommendations and solutions (Entman 1993, 2007).

4 Of course, the European Commission and European Parliament are also influenced by national policies and public debates in the member states. However, due to our focus on interest groups registered in the EU transparency database, we abstract from these issues. We leave it to future research to examine the influence of national policies and debates on the design of the EGD.

BIODIVERSITY

4. BIODIVERSITY

4.1 EU initiatives on biodiversity: a brief overview

The EU has a long history of working on issues of biodiversity. For example, the EU Birds Directive was adopted in 1979 to protect all wild birds and their most important habitats. In 1992, the Habitats Directive expanded this objective to include additional species of wild animals, plants, and habitat types. Together, these two directives constitute the EU Birds and Habitats Directive, which underpins all initiatives related to biodiversity. They aim to ensure that the protected species and habitats are maintained or restored to a 'favourable conservation status' (European Commission 2014).

In May 2011, the EU adopted its 'Biodiversity Strategy to 2020'. As a response to EU member states' failure to meet the targets of the previous strategy, it set out the most ambitious goals to date. Yet despite the high level of acclaimed political commitment, the mid-term review of the 2020 strategy looked grim: compared to the 2010 baseline, loss of biodiversity and degradation of ecosystems had continued (European Commission 2015). Similarly, BirdLife, an NGO working to protect birdlife and biodiversity-related aspects, concluded that 'the implementation of actions that required new legislation, financing and implementation or enforcement of existing legislation was poor, suggesting a lack of high-level political commitment' (Langhout 2019).

The 2020 Biodiversity Strategy therefore failed to make up for years of decline in biodiversity. Against this background, the Commission designed a new 'Biodiversity Strategy for 2030' as part of the EGD. While the Strategy outlines five types of policy tool,⁵ we focus on one particular aspect due to the limited scope of this study: initiatives related to areas protection.

⁵ The five policy tools of the Biodiversity Strategy are as follows: areas protection; areas restoration; regulation of agricultural practices; fiscal and financial solutions; and international policy.

4.2 Areas protection

The creation of protected areas is a key tool for preserving biodiversity. The Biodiversity Strategy aims for at least 30 percent of land and 30 percent of sea in the EU to be protected. This corresponds to an extra four percent of land and 19 percent of sea areas as compared to today, though the gap varies largely between member states (for example, eight percent for Denmark and 38 percent for Slovenia). In addition, at least one third of protected areas, that is, 10 percent each of land and sea, should be strictly protected – defined as areas where natural processes are left entirely undisturbed, occupied by naturally occurring habitats and species. In these areas, extractive activities such as mining, fishing, hunting, or forestry are forbidden. Today, merely three percent of land and less than one percent of marine areas are strictly protected (European Commission 2020b), illustrating the ambitious nature of the targets.

Member states are responsible for designating new protected areas by defining conservation objectives and measures, and report these to the European Environment Agency. The three main types of area targeted for protection are as follows:

- Forests: for example, strictly protecting all of the EU's remaining primary and old-growth forests.
- Sea areas: for example, marine resources must be harvested sustainably with zero tolerance for illegal practices.
- Areas of carbon-rich ecosystems: for example, peatlands, grasslands, wetlands, mangroves, and seagrass meadows should be strictly protected, while considering projected shifts in vegetation zones.

In addition to these protected areas, high biodiversity spaces should be preserved to strengthen the fight against invasive species.

The target is a 50 percent reduction in the number of Red List species, which lists species close to extinction,⁶ with a focus on those threatened by invasive alien species. Finally, active management such as prevention and combat of fires and disease control will be needed as part of the Strategy. For instance, the summer 2021 wildfires in Greece highlight this urgency (Reuters 2021). Currently, the Commission suggests funding the Biodiversity Strategy through a combination of national public funds, private funds, and EU financial instruments (namely, Invest-EU), CAP Strategic Plans to unite biodiversity and agriculture, and existing EU programmes such as Horizon Europe (European Commission 2020b).

4.3 Lobbying activities

To identify the key actors in shaping the Biodiversity Strategy, we examined the lobbying activities on biodiversity. As depicted in Figure 4, NGOs, with 247 meetings, are the most active type of lobbyist. The interest groups that spend most resources on lobbying are pro-environmental groups such as WWF, BirdLife, and Greenpeace who push for an ambitious Biodiversity Strategy (see below). Following NGOs, lobby groups representing business interests – trade and business associations and corporate representatives – feature prominently in our analysis. For example, trade and business associations met 120 times with members of the European Commission or Parliament. Such associations active on the European level include the Confederation of European Forest Owners (CEPF), the Confederation of European Paper Industries, and the European agri-cooperatives (COGECA). National associations most active in biodiversity are the Finnish Forest Industries Federation (Metsäteollisuus ry), the Swedish Forest Industries Federation (Skogsindustrierna), and the German Farmers' Association (Deutscher Bauernverband). In terms of individual corporations, the Finnish Metsä Group was the most active.

⁶ The Red List for the region of Europe currently includes 15,060 species including mammals, amphibians, reptiles, birds, and fish. See <https://ec.europa.eu/environment/nature/conservation/species/redlist/>

Fig. 4: Types of lobby group active within the biodiversity strategy



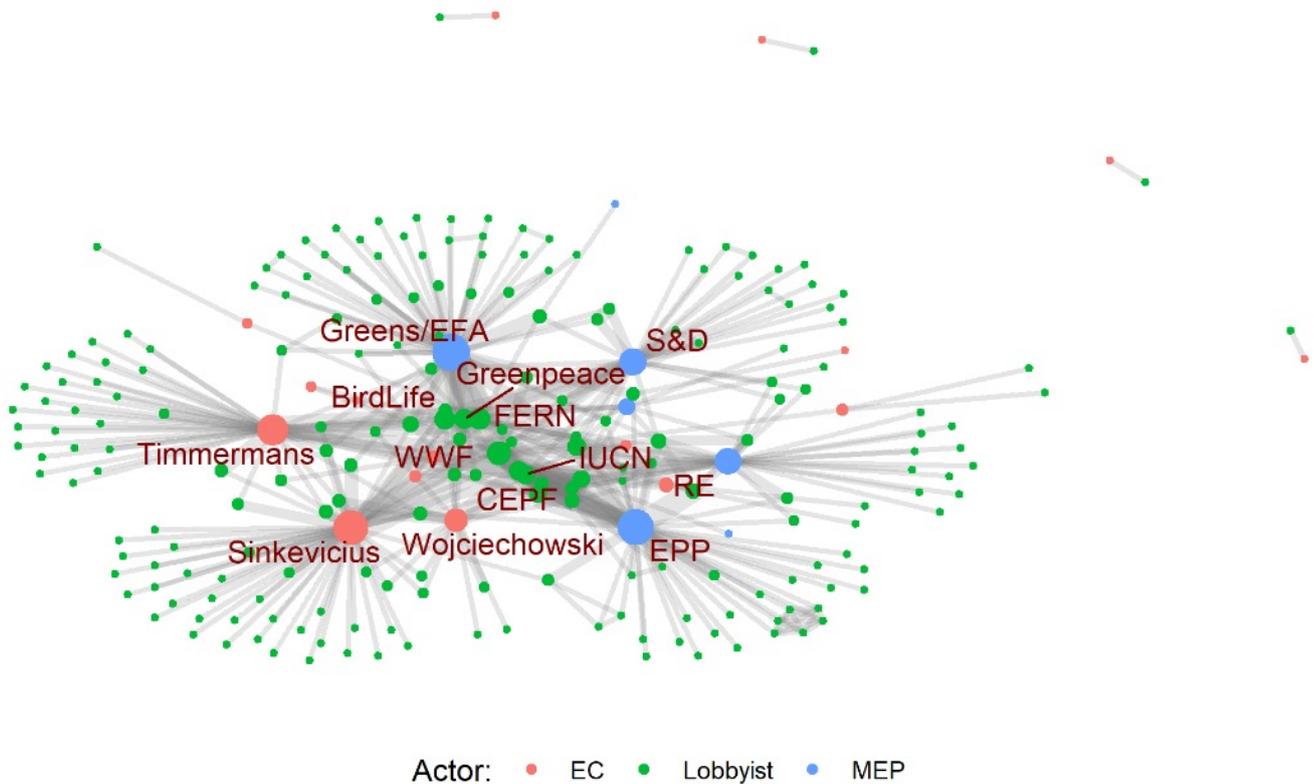
Source: Own calculation based on Integrity Watch EU (2021).

Notes: Number of lobby meetings with the European Commission and the European Parliament per lobby group type between 1 December 2019 and 25 February 2021. Based on the official classification of the transparency register, we re-classified the types of lobby group as depicted. In case of inconsistency or partial lack of data, lobby group categories were added manually.

Next, we disaggregate the type of lobbyist and look at the lobbying activities of individual actors. In Figure 5, we visualise the meetings between lobby actors with the European Commission and the European Parliament on biodiversity. Each dyad represents a meeting – either a joint meeting, that is, if there is a link between two lobbyists (depicted in green), or a meeting with the European Commission (red) or a member of the Parliament (blue).

The thickness of the line represents the number of meetings for a given dyad. The size of each actor represents the total number of meetings they are involved in. At the centre of the network is a small number of NGOs who are most active in the case of biodiversity. At the same time, many lobby groups only had one or two meetings, and these organisations are further removed from the centre of the network.

Fig. 5: Network of lobby actors, European Commissioners, and political parties in the European Parliament in the case of biodiversity



Source: Own calculation based on Integrity Watch EU (2021).

Notes: The network visualises the number of meetings on biodiversity between lobbying groups and the European Commission (the European Commissioners themselves or their cabinet members) and parties of the European Parliament between 1 December 2019 and 25 February 2021. The size of the nodes represents the total number of meetings the respective actor was involved in; the thickness of the ties represents the number of meetings between two actors. For reasons of readability, only the most active actors are labelled.

Concerning the European Commission, three commissioners and their cabinets met most frequently with interest groups: Frans Timmermans (executive Vice-President of the European Commission in charge of the European Green Deal); Virginijus Sinkevicius (Commissioner for Environment, Oceans and Fisheries); and Janusz Wojciechowski (Commissioner for Agriculture). The high number of lobby meetings particularly with Timmermans and Sinkevicius reflect their

core responsibilities for the EGD and biodiversity respectively. Concerning the Parliament, members of the political group Greens/EFA, the European People’s Party (EPP), and the Progressive Alliance of Socialists and Democrats (S&D) receive the most attention by lobby groups. By contrast, Renew receives considerably less attention from interest groups on biodiversity, which is possibly due to their size and key portfolio in the European Parliament.

4.4 Stakeholder mapping

The visualisation of lobbying activities allows us to identify the most relevant actors – in terms of officially recorded meetings with the Commission and members of the Parliament – on biodiversity. Here, we discuss the types of actor involved, the framing employed by those interest groups, and their objectives. Taken together, this sheds light on how interest groups shape the EGD.

Types of actor

There are principally two types of interest group that lobby on biodiversity. First, environmental NGOs are well represented, especially WWF, FERN, Greenpeace, BirdLife, and Naturschutzbund Deutschland (NABU). These five organisations share the objective of protecting and preserving biodiversity, but are accountable to different people. In addition, the International Union for Conservation of Nature (IUCN) also supports the preservation of biodiversity, but as an umbrella organisation. While WWF and Greenpeace operate in countries around the globe and on a broad range of environmental issues, the other actors have a narrower focus, both geographically and substantively. For instance, FERN focuses exclusively on forests in EU policymaking. By contrast, the IUCN represents governments, civil society organisations, and experts to facilitate international cooperation and to provide scientific knowledge and tools for conservation and restoration of nature, for instance through the publication of the Red List of threatened species. Meanwhile BirdLife strives to conserve birds, their natural habitats, and global biodiversity worldwide through conservation programmes that provide the framework for planning, implementing, monitoring, and evaluating conservation work. A second type of actor emerging from the lobbying network is organisations representing forest owners, both private (CEPF) and state/public (EUSTAFOR). In Appendix A1, we provide a full description of the most important NGOs lobbying on biodiversity.

Framing

Although all these interest groups lobby to protect biodiversity, they do so from a different perspective. For instance, WWF and Greenpeace take an all-encompassing approach to protect biodiversity in all its forms (Greenpeace 2021b; WWF 2021). By contrast, FERN, mirroring its narrower scope, emphasises that European forests are under pressure, and that biodiversity and forests must be protected by protecting the rights of forest communities and indigenous people. For its part, BirdLife warns that the world's natural forests are of critical importance for birds and other biodiversity, natural habitats, and ecosystem services. Regardless of these differences, all NGOs consider the protection of biodiversity and forests as an end in itself. As a deliberate strategy to exercise expert authority and obtain instrumental power, these NGOs tend to emphasise that the initiatives they are advocating are science-based (A rocha et al 2020).

In stark contrast, forest owners – represented, *inter alia*, through CEPF and EUSTAFOR – highlight the importance of securing biodiversity as it represents an important resource that, if managed sustainably, has the potential to ensure renewable raw material whilst providing important ecosystem services. Unlike NGOs, forest owners emphasise the importance of forests as a comparative advantage in global economic competition. They argue, for example, that the implementation of specific measures of the EU Biodiversity Strategy 2030 will reduce wood production in EU member states, which would entail the risk of 'off-shoring' a larger percentage of the EU's timber production outside the continent (Dieter et al 2020) and beyond the EU's control.

Forest owners, especially private ones, have also promoted so-called 'market-based' policies. Market-based solutions establish monetary costs and rewards that act as incentives to internalise environmental externalities (Engel, Pagiola and Wunder 2008; Gómez-Baggethun et al 2010).

For example, companies may be compensated for carbon sequestration delivered by a tree. Compared to legally binding constraints, these solutions usually involve a low level of state governance. As a result, the CEPF recommends market-based approaches as a non-bureaucratic and effective manner of allocating the funds required to manage forests sustainably (CEPF 2020). At present, forest owners can only generate revenue through the sale of wood, but payment for ecosystem services would broaden this scope. Thus, they advocate for the implementation of market-based solutions because these would allow them to monetise biodiversity more broadly, a policy that was also promoted in the recently published Dasgupta Review to the UK government (Dasgupta 2021).

Objectives

The organisations reviewed here all support the Commission's objective to protect and restore biodiversity, but there are divergent views on how to achieve those targets. Greenpeace is highly critical of the Commission's initiative on biodiversity. For example, it criticised the EU Forest Strategy for 'effective afforestation', ultimately 'promoting monoculture tree plantations that mostly serve the needs of forest industries and destroy nature' (Greenpeace 2019). In addition, Greenpeace has been critical of the missing link between the reformed Common Agricultural Policy and biodiversity, going so far as to accuse the Commission of a 'fake green deal' (Greenpeace 2021a). In the same vein, BirdLife (2019) stated that the EGD was 'good for climate [but] bad for biodiversity.' Beyond specific aspects of the Biodiversity Strategy, most organisations emphasise that voluntary commitments are insufficient – particularly in view of failed work on restoration of biodiversity in the past (European Commission 2017). Further, WWF, BirdLife, and NABU argue for the EU targets for nature restoration on land and sea to be legally binding and 'expressed in quantitative and similar terms for each member state' (A rocha et al. 2020).

There is widespread agreement amongst NGOs that the legally binding targets are key for ensuring progress, as the voluntary schemes that have been in place up until now have not delivered on their promises (ibid).

The interest groups representing forest owners similarly share the objective of restoring biodiversity, but they advocate for different means. EUSTAFOR and CEPF both emphasise – consistent with their mission – the role of forest management. For example, in February 2021, EUSTAFOR promoted active forest management as an approach that allows forest owners flexibility in meeting EU targets (EUSTAFOR 2021). In contrast to the uniform approach favoured by NGOs, forest owners want targets to be specific for each member state and their relative ecosystem restoration's needs, based on a bottom-up approach. EUSTAFOR underlines that a 'one size fits all' approach will not work, as the regional contexts differ across the EU.

The strong presence of NGOs in this policy area shows that NGOs are seeking to exercise instrumental power through lobbying by providing empirical evidence and expert knowledge on biodiversity. For example, FERN strategically seeks to deploy their expert knowledge on sustainable foresting in order to advance their agenda (FERN 2021). Apart from setting up meetings with commissioners and MEPs, some NGOs are also pursuing more traditional advocacy networks such as campaigning in order to create conditions of 'noisy politics'. For instance, in autumn 2020, Greenpeace, FERN, and WWF led the campaign 'Together4forests', which, with the support of more than one million people, demanded better forest protection from Commissioners Timmermans and Sinkevičius.

Having shown how the officially recorded lobbying activities in the area of biodiversity are dominated primarily by NGOs seeking to exercise their influence through instrumental power and noisy politics, the next section will examine the issue of hydrogen, where the power dynamics at play turn out to be very different.

HYDROGEN

5. HYDROGEN

5.1 Background

Hydrogen as an alternative energy source was first popularised in the mid-20th century, when nuclear power plants would provide energy for hydrogen production at times of low demand (Froehlich 2017). This idea resurged with the rise of renewable energy, where hydrogen can be used as energy storage as well as a (transport) fuel (International Energy Agency 2020; World Resources Institute 2020). There are two ways of producing hydrogen. First, steam methane reforming is a process where natural gas reacts with steam to create hydrogen. This is the most widely used form of hydrogen production and already deployed at industrial scale (European Commission 2021b) with a relatively high carbon footprint (Rostrup-Nielsen and Rostrup-Nielsen 2002). Second, via electrolysis, water is separated into hydrogen and oxygen by an electric current. This process emits less carbon and can even be carbon neutral. The following three classes of hydrogen have been established (IRENA 2019):

- Green Hydrogen: produced from electrolysis with low-carbon or renewable energy sources (no-low emissions).
- Blue Hydrogen: produced either from steam methane reforming with low-carbon energy sources or from electrolysis with non-renewable energy sources, combined with carbon capture, utilisation, and storage (CCUS) technologies (low-medium emissions).
- Grey Hydrogen: produced via steam methane reforming using mainly natural gas and possibly non-renewable energy (high emissions, more than 36.4g CO₂eq/MJ H₂). Alternatively, the term 'brown hydrogen' is sometimes used for hydrogen produced through coal gasification.

5.2 Hydrogen between European and national contexts

Hydrogen has been primarily a national issue (IRENA 2019). In the European context, hydrogen has been part of the research environment, most prominently since 2008 through the Fuel Cell and Hydrogen Joint Undertaking (FCHJU) (Regulation (EC) No 521/2008 of 30 May 2008). In 2016, the European Commission published the Hydrogen Roadmap Europe (EU Renewable Energies Directive [COM(2016) 767 Final/2]), which defines hydrogen as central to decarbonising not only transport, but also the gas grid and high-energy industries (such as steel-making).

The initial communication of the EGD (European Commission 2019a) mentioned hydrogen only three times, and only as components of other major initiatives. Hydrogen did not form part of the annexed roadmap. Belatedly, the European Commission (2020a) presented its 'Clean Hydrogen Strategy' (ECHS) in July 2020, which projects hydrogen to fulfil a multipurpose use as feedstock, energy carrier, and as storage, making it a much-needed 'solution to decarbonise industrial processes and economic sectors where reducing carbon emissions is both urgent and hard to achieve.' Accordingly, hydrogen is a cornerstone for the EU's commitment to reach carbon neutrality by 2050 and a 'key priority to achieve the European Green Deal and Europe's clean energy transition.'

In parallel to the Hydrogen Strategy, the Commission announced the establishment of the European Clean Hydrogen Alliance (CHA) (European Clean Hydrogen Alliance 2020).

The CHA is a stakeholder forum that brings together political decision makers, industry, the research community, and civil society to advance the development and deployment of hydrogen in Europe within the context of the EU's industrial strategy (European Commission 2021a). On 23 February 2021, the European Commission published a proposal to set up a new European Clean Hydrogen Partnership within the Horizon Europe framework that mobilises funding for the implementation of ECHS in the range of €3 billion (European Commission 2020a).

According to the World Energy Council Germany (2020), at the time of the publication of ECHS, three EU member states (France, Netherlands, Germany) had fully formulated national hydrogen strategies in place, with Spain and Portugal (and an updated French strategy) to follow shortly after (see Appendix A2 for more details on the national context). In contrast to the ECHS priority of the roll-out of large-scale technology, the member states focus mainly on transport applications as well as infrastructure from renewable electricity production to gas network integration (with the exception of France and Germany, who also emphasise technology research and development [R&D] and scaling). This focus largely represents the industrial structure and capabilities of the respective EU countries and hydrogen's role as a tool of industrial policy, rather than climate policy.

Given the advanced stage of national hydrogen strategies in a group of EU countries that combines the biggest economies and countries from the North and South, the European Commission seems to have had no other option than to integrate hydrogen into the EGD. Since structural power within the European multi-level governance system can be relayed through national administrations, it is reasonable to assume that national hydrogen efforts have influenced the European hydrogen strategy and its implementation.

5.3 Lobbying activities

We now take a closer look at lobby meetings with senior officials from the European Commission and members of the Parliament since December 2019. Figure 6 shows that the two lobby groups representing business interests are very active. First, corporate actors met 95 times with the European Commission and Parliament to discuss issues pertaining to hydrogen. The most active corporations are large-scale energy companies such as Shell, Ørsted A/S, Enel SpA, and Iberdrola – which represent opposite interests within the hydrogen spectrum. Second, there were 72 meetings with representatives of trade and business associations on record. Here, issue-specific associations such as Hydrogen Europe and Wind Europe as well as sector-specific associations on the European and international level such as Eurogas, International Association of Oil & Gas Producers (IOGP), and European Chemical Industry Council are the most active. Nation-specific associations play a minor role; only two German associations (German Association of Energy and Water Industries and German Hydrogen and Fuel Cell Association) are among the lobby organisations.

In contrast to the EGD (Figure 3) and biodiversity (Figure 4), NGOs are much less active on hydrogen: only 32 meetings were recorded in our sample period. Here, pro-environmental NGOs such as Sandbag Climate Campaign, the Climate Action Network Europe, and the European Environmental Bureau are most active, aiming to shape the hydrogen strategy at the European level. The remaining types of lobbyist account for only a small share of lobbying activities: research institutes (14 meetings); municipal actors (10 meetings); consultants (seven meetings); and trade unions (two meetings).

Fig. 6: Types of lobby group active within the hydrogen strategy



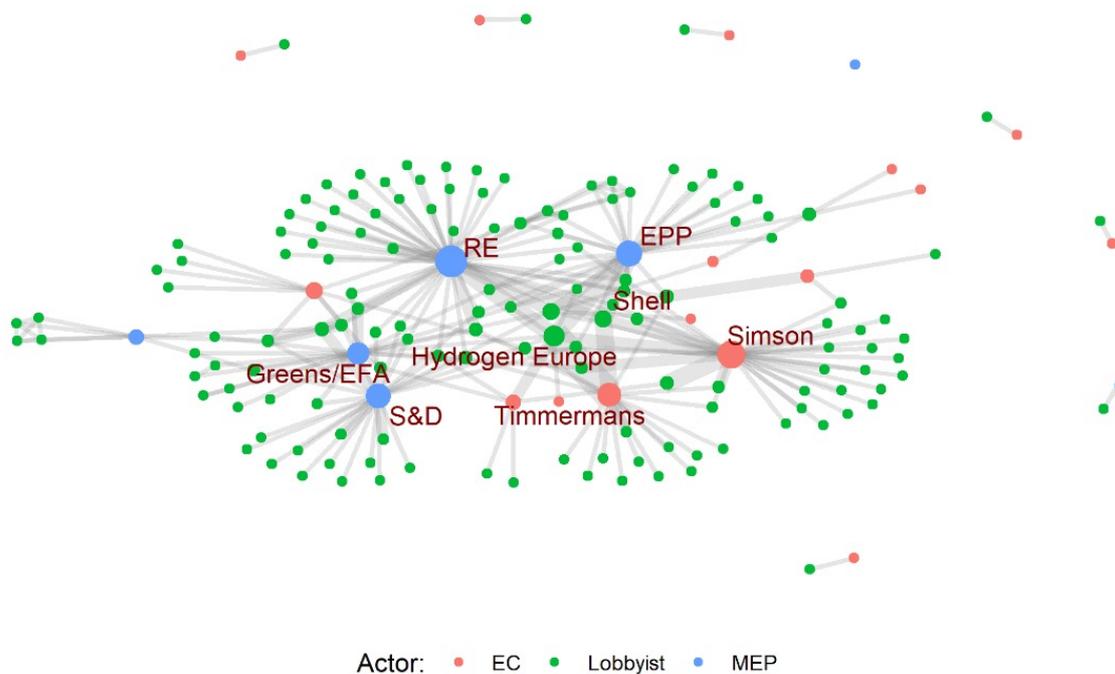
Source: Own calculation based on Integrity Watch EU (Integrity Watch EU 2021).

Notes: Number of lobby meetings with the European Commission and the European Parliament per lobby group type between 1 December 2019 and 25 February 2021. Based on the official classification of the transparency register, we re-classified the types of lobby group as depicted. In case of inconsistency or partial lack of data, lobby group categories were added manually.

Figure 7 presents the structure of these lobbying activities on hydrogen. In line with Figure 5, each dyad represents a meeting – either a joint meeting, that is, if there is a link between two lobbyists (depicted in green), or a meeting with the European Commission (red) or a member of the Parliament (blue). Corporate representatives, such as Shell or Hydrogen Europe, occupy the centre of the network. Apart from these organisations, the network is much smaller compared to biodiversity, and most organisations only met with EU representatives once or twice. From the perspective of the European Commission, the Cabinet of Timmermans (executive Vice-President of the European Commission in

charge of the European Green Deal) and the Cabinet of Simson (Commissioner for Energy) account for most lobbying activities, which is consistent with their positions and mandates. Concerning the Parliament, members of the political group Renew Europe (RE), the European People’s Party (EPP), and the Progressive Alliance of Socialists and Democrats (S&D) are the focus of lobby meetings. One notable difference compared to the lobbying activities on biodiversity is the central role of Renew here; we believe its strong position and active engagement on hydrogen as well as the proximity of Commissioner Simson in terms of political orientation explain these patterns.

Fig 7: Network of lobby actors, European Commissioners and political parties in the European Parliament in the case of hydrogen



Source: Own calculation based on Integrity Watch EU (Integrity Watch EU 2021).

Notes: The network visualises the number of meetings on hydrogen between lobbying groups and the European Commission (the European Commissioners themselves or their cabinet members) and parties of the European Parliament between 1 December 2019 and 25 February 2021. The size of the nodes represents the total number of meetings the respective actor was involved in; the thickness of the ties represents the number of meetings between two actors. For reasons of readability, only the most active actors are labelled.

5.4 Stakeholder mapping

In the following, we discuss – according to the approach established in Section 4 – the types of actor involved in lobbying, their respective framing of hydrogen, and their stated or implicit objectives.

Types of actor

The governance space of the ECHS is dominated by corporate interests. As shown in Figure 6, roughly two thirds of recorded lobby meetings were logged by the corporate sector and business associations. A small number of NGOs has also been active but appears to be less influential than the combined instrumental power of the corporate sector. These NGOs include Sandbag Climate Campaign, the Climate Action Network Europe, and the European Environmental Bureau.

Unlike other governance areas (for example the Biodiversity Strategy), there is no clear opposition between NGOs and corporate interests. Within the ECHS, the fault line lies within the corporate sector, between actors that prefer strong commitments towards green hydrogen, and those who also support other types. The former include Spanish utility giant Iberdrola, while the latter encompass companies with a legacy in fossil fuel production such as the oil and gas supermajor Royal Dutch Shell (Shell) as well as the industry association Hydrogen Europe – the three of which shall function as representatives for the respective positions.

One particularity of the ECHS is that with the Fuel Cell and Hydrogen Joint Undertaking (FCH JU), the sector includes an EU-sanctioned public-private partnership (PPP) that allows for interactions between stakeholders (including political) that are not required to be reported, and consequently does not feature in our data. Nevertheless, the unique composition and influence of the FCH JU makes it important to study. The FCH JU is a PPP that engages the EU (European Commission), the hydrogen industry (through Hydrogen Europe), and the research community (through Hydrogen Europe

Research, HER). The FCH JU itself, and corporate membership, can thus be interpreted as a higher degree of structural power by virtue of its position in the policy area.

With a budget of around €1 billion split equally between the European Commission and the industrial partners, the FCH JU forms the central node of funding R&D for hydrogen-related projects in Europe (FCH JU 2019). Major parts of research funding go into technological development (for example, developing secure hydrogen tanks for cars) and other projects across the hydrogen value chain. To what degree large-scale industry profits from FCH JU grants in relation to their respective turnover and smaller partners requires further analysis. Smaller grants were made for social science research and communications projects. For example, ‘Hydrogen For All of Europe’ allocated almost €2 million towards developing communications strategies for hydrogen energy. National hydrogen efforts are being supported as well, for example through ‘Hydrogen Mobility Europe’ where approximately €30 million was distributed to support efforts to roll out hydrogen transport infrastructure in Germany, France, Scandinavia, and the UK. Apart from R&D, FCH JU also serves as an institutionalised platform that facilitates the exchange between stakeholders and develops policy proposals.

The main decision-making body of FCH JU is its governing board. Where Hydrogen Europe is represented by six industry representatives, the EC has three representatives, one each from DG Energy, Transport (MOVE), and Research & Innovation, plus the Chair of Hydrogen Europe Research. Through the Commission’s representation in the governing board of FCH JU as well as through the stakeholder forum and the review days (conferences to showcase FCH JU’s work and exchange positions), industry interests might find relevant commissioners’ ears without transparent documentation, representing quiet politics.

In other words, through quiet business politics the actors involved in FCH JU seek to influence the European Commission through expert knowledge and closed talks, with no interest in making the discussion public.

Framing

Iberdrola is the largest Spanish electricity utility. Its business spans electricity production and gas grids to related consumer services. It operates in nine EU member states, plus the UK, the US, Canada, Mexico, Brazil, and Australia. According to its Integrated Report 2021, Iberdrola identifies renewable energy production (primarily solar PV but also wind) as its most important growth sector but is also currently building Europe's largest yet PV-powered green hydrogen production site (20MW electrolyser) in Spain (Iberdrola 2021).

Shell, on the other hand, is one of the remaining supermajor multinational oil and gas companies and among the largest companies in the world. Shell explicitly states on its website that it targets net-zero emissions by 2050, 'in step with society's progress' (Royal Dutch Shell 2021b), what NGO Corporate Europe Observatory (Corporate Europe Observatory 2021) criticises as 'a roadmap for business as usual'. According to its 2020 annual report, Shell places hydrogen at its marketing end of the value chain with the provision of refuelling infrastructure. However, it is also integrating hydrogen production into its refining activities, for example by building a 10MW electrolyser in Germany and a 20MW 'renewable power' electrolyser in China. Shell already operates 50 hydrogen fuelling sites in the US and Europe (Royal Dutch Shell 2021a).

According to the organisation LobbyFacts (LobbyFacts 2021), Shell spent up to €4.5 million for lobbying efforts in Brussels, including on the EGD and the hydrogen strategy. With a history of opposing strong EU environmental regulation (eg, Neslen 2015), this suggests that Shell follows its tradition and supports a broad approach to hydrogen, including grey and blue hydrogen.

Finally, Hydrogen Europe supports both the production of blue hydrogen with CCS technology and the repurposing of the gas grid for hydrogen transport, alongside the development of green hydrogen production capabilities (Hydrogen Europe 2020a). Furthermore, Hydrogen Europe promotes long-term strategies such as the 2x40GW Initiative, which suggests installing 40GW production capacity in the Ukraine and North Africa by 2030 (Hydrogen Europe 2020b). It thereby promotes hydrogen as a strategic objective of the EU that goes beyond climate change and internal energy policies and uses hydrogen as a geostrategic tool for EU external action.

Objectives

All identified actors support the expansion of hydrogen at scale, although they differ in how they prioritise green hydrogen as opposed to other forms of hydrogen as transitional technologies. Iberdrola is not directly represented in the FCH JU, has not been a beneficiary of FCH JU grants, and does not appear to have any public connections to Hydrogen Europe. On the contrary, as a leader in renewable energy and green hydrogen, in March 2021, Iberdrola co-signed an open letter to the EC demanding that 'so-called "low carbon" fossil fuels, should not be included in any provision under the Renewable Energy Directive nor should they count towards the EU's binding 2030 renewable energy target' (Alametsä n.d.).

Shell, on the other hand, has been central to the FCH JU, as a founding member, contributor, and recipient (European Communities 2003). Overall, hydrogen is of concern to Shell and is presented as a useful by-product in the refining process, where Shell also advocates for Carbon Capture and Storage (CCS) technologies. Within this context, Shell's interests seem to favour grey or blue hydrogen over green, thereby casting doubt on their purported interest in a green and just transition.

Hydrogen Europe as the European-level industry association for the hydrogen and fuel cell industries forms part of the FCH JU. According to the European Transparency register, Hydrogen Europe represents 'more than 270 companies and 27 national associations as members.' Like most industry or business associations, Hydrogen Europe covers a broad range of actors and interests. Through the privileged status in the FCH JU, it certainly enjoys a high level of influence. That being said, it is hard to prove that this influence is predominantly used for the extension of the lifecycle of existing fossil fuel investments. Nevertheless, it is plausible that Hydrogen Europe also successfully represents those interests which potentially undermine the EGD's level of ambition in the short- to medium-term.

DISCUSSION

6. DISCUSSION

The previous two sections reveal the complex nature of lobbying activities, strategies, and objectives of actors involved. Nonetheless, some patterns emerge that plausibly extend beyond biodiversity and hydrogen to other aspects of the EGD. In terms of actors involved in lobbying with members of the European Commission and Parliament, there are clear differences between biodiversity and hydrogen, the former being dominated by NGOs, whereas corporate interests are of the most importance to the latter. These differences in stakeholders involved can largely be explained by the nature of the two concerns and policy areas affected. Due to the relative absence of big financial interests in biodiversity-related activities, and due to the prevalence of policy solutions in the form of regulation and standards in this case, the framing of biodiversity as an end in itself tends to prevail. Conversely, hydrogen is envisioned as becoming a part of the EU economy through large-scale investments (in energy generation capacities, electrolysers, hydrogen grids, and R&D). Thus, funding across the hydrogen value chain is a fundamental part of the hydrogen case, involving large, for-profit entities from the industrial sector. For this reason, the question of how the money will be distributed is certainly the central element the lobbyists are competing for.

Further, the nature of biodiversity and hydrogen, respectively, make stakeholders pursue different strategies. For biodiversity, instrumental power – and noisy politics in particular – is key to increasing the salience of the relatively ‘quiet’ issue of biodiversity – which pro-environmental NGOs have been doing for decades by drawing attention to environmental disasters. For hydrogen, quiet politics is primarily exercised. Through the FCH JU, industrial interests can contribute to the development of standards and legislative proposals, while corporate interests have their domestic structural power translated into structural power on the European level through the establishment of national strategies which the respective national governments promote.

The attempted noisy politics by NGOs (reflecting the comparatively small instrumental power), as evidenced in the case of the open letter to the Commission, also builds on the support of ambitious corporate interests. It will be useful to observe whether this coalition can solidify and achieve a higher degree of influence.

We argue that these dynamics plausibly extend to other aspects of the EGD, such as agriculture or health issues. For example, in spring this year, the EU hosted a triologue on the reform of the CAP to incorporate climate-related issues, such as biodiversity, in the new strategy of agriculture policy. However, the Commission has not succeeded in managing to integrate CAP into the EGD framework. To the contrary, agriculture will continue to cause loss of nature and be a driver of climate change (Ruiz and Leemans 2021). This speaks ill to the future prospects, not just of the biodiversity initiatives, but also the Farm to Fork strategy, which is also an important part of the EGD and closely intersects with a broad range of aspects of biodiversity. Our framework and findings may help to understand how the situation could be remedied in the future. For example, agriculture is a policy area in which structural power is very important, and also largely dominated by quiet politics. Thus, NGOs would do well to take their science-based approach to this issue and attempt to draw wider media attention to the link to climate policy.

In addition to agriculture, our two cases speak to another key dimension of the EGD: public health. For instance, in 2015, the World Health Organization published a report on the connections between biodiversity, nutritional diversity, and health. Biodiversity and human health, and the respective policies and activities, are interlinked in manifold ways (WHO 2015).

In the context of health, a 'fair and just transition' seems highly ambitious, because the health of the European people is unequally distributed (Forster, Kentikelenis and Bambra 2018), which was further exacerbated by the COVID-19 pandemic (eg, Bambra et al 2020). The cases of biodiversity and hydrogen each share important similarities, but also differences, with health in Europe. For example, similar to biodiversity, where the most active actors are NGOs, civil society organisations can play a key role in reducing health inequalities (Doyle et al 2019). However, the stakes in health policy are high and corporate interests do influence policymaking, similar to hydrogen. For example, the food and drink industry successfully lobbied against a sugar tax, largely based on strategies previously successfully employed by the tobacco industry (Tselengidis and Östergren 2019). Arguably, health policy in Europe and its role in the EGD therefore occupy a space between biodiversity and hydrogen. While we leave this analysis for future research, we believe that our focus on lobbying activities offers a good starting point.

CONCLUSION AND POLICY RECOMMENDATIONS

7. CONCLUSION AND POLICY RECOMMENDATIONS

To understand the design and politics of the EGD, we have selected two key strategies: the EU Biodiversity Strategy 2030 and the European Clean Hydrogen Strategy. Our analysis shows that lobby groups have taken an interest in both strategies. The absolute number of meetings with senior officials from the European Commission and members of the Parliament is higher for biodiversity than hydrogen, reflecting the 'noisier', or more politicised, nature of the former. A closer look at the types of actor reveals that pro-environmental groups (for example, NGOs such as WWF) as well as trade and business associations (for example, forest owner associations) dominate the landscape of biodiversity. By contrast, we find that corporate interests dominate lobby meetings on hydrogen, with several big corporations pursuing their agenda individually as well as through Hydrogen Europe, the main business association in this space. Here, NGOs remain comparatively unimportant. One notable particularity is the existence of the FCH JU, a PPP that encompasses industry, politics, and the research community which might obscure lobby efforts through the institutionalised exchange via this construct.

Before presenting our policy recommendations, we discuss three limitations. First, the EGD is a moving target: numerous initiatives and policy instruments are debated at this very time. As a result, the legislative footprint of the actors investigated is not clear enough to draw strong conclusions. Nonetheless, we believe that our contribution helps policymakers, scholars, and civil society organisations to better understand the decision-making process of the EGD and the 'Fit for 55'. Second, we considered structural and instrumental power as key inputs in the governance of the EGD. While they are analytically distinct, not all of these are empirically observable – particularly

with our emphasis on the official records of lobbying activities. We leave it for future research to examine the lobbying activities in more detail (for example, by complementing the network with interviews of the actors involved) and to consider different sources of power more broadly. For instance, to hold structural power to account, it would be useful to examine the role of member states in the evolution of the ECHS and member states' possible conflicts of interest in biodiversity related to agricultural and forestry policy. For this, one would require access to both national decision-making processes and informal networks between member states and the European Commission. Similarly, the FCH JU is a black box that can hardly be opened with quantitative methods. From the official minutes and communiqués to the informal conversations at the fringes of its meetings and events, qualitative process tracing would be an appropriate approach to truly understand the role of this institutional construct. Finally, our focus on lobbying activities has implicitly equated meetings with influence. Of course, a meeting with commissioners or members of the Parliament does not necessarily equal policy influence since the policy input from interest groups can be disregarded. In addition, lobbying is only one potential dimension of influence. We have not considered other levers of influence, such as the funding activities (mostly from business organisations) to particular politicians. Likewise, we do not account for how commissioners and MEPs are embedded in national politics and national public debates, both of which are likely to influence their actions. For instance, industries in some countries have a distinct interest in biodiversity (for example, bioeconomy and forestry) that are articulated in national contexts. A look at the role of specific countries and their economy might add to the understanding of how EGD policies evolve. Future studies should do so.

Despite these important areas for future research and shortcomings, we derive several important lessons for policy reforms:

- Given the significance of lobbying in shaping the EGD from interest groups, it is important to avoid lobbying efforts watering down the attempt to make a greener future for Europe, especially as talks intensify for the 'Fit for 55' package. In order to ensure a progressive EGD, it is therefore important to pursue a strategy of 'noisy politics' to counter business interests, which tend to be most successful in times of low political salience and little media attention ('quiet politics') (Culpepper 2010; Kastner 2018). Progressives should therefore push for an open public debate on the design and implementation of the EGD, and increase media attention to show the public what is at stake on these matters – including for policy issues that are highly technical, such as hydrogen. NGOs have been forthcoming in lobbying for an ambitious strategy on biodiversity, but progressives will also need to pay attention to an industrial-policy-related area such as hydrogen, to limit the influence of business interests and to ensure green hydrogen is the only policy option.
- Considering the high level of interest from many different interest groups in shaping and influencing the EGD at this still early point in time, NGOs and other actors pursuing a progressive agenda should actively develop and deploy their expertise to increase their instrumental power. As shown in our data, business and business associations frequently meet with commissioners and MEPs to advance their interests, some more so than others. Progressive actors, broadly defined, should pursue similar strategies and seek to offer a credible alternative to business experts, whilst highlighting that they speak in the interest of the citizens and guided by climate science.
- Although a number of reforms and initiatives by the Juncker Commission (for example, by establishing the EU transparency register) improved the transparency, accountability, and integrity of EU institutions' policymaking, the full spectrum of EU policy- and decision-making remains incomplete and opaque. A progressive agenda should push for a comprehensive and complete legislative footprint including external oversight and effective sanctions for the European Commission, the European Parliament, and the European Council. This includes extending the mandatory publication of lobby meetings beyond rapporteurs, shadow rapporteurs, and committee chairs (for the European Parliament) as well as beyond commissioners, their cabinets, and director-generals (for the European Commission). In addition, standardisation, an increase in usability, and the publication of meeting minutes and mentioning of concrete legislative files would ensure a more transparent lobby register.

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APPENDIX

Actors in biodiversity lobbying

Organisation	Type	Framing of biodiversity	Objectives	Strategies
WWF	The world's largest and most experienced independent conservation organisation and a key NGO in biodiversity.	Biodiversity loss, degradation, over-exploitation, and habitat fragmentation has led to a biodiversity crisis.	<p>Seek to establish law enforcement.</p> <p>Welcome the EGD as a way of addressing biodiversity loss.</p> <p>Legally binding targets are necessary, as voluntary schemes have not yet delivered.</p> <p>Need to get to 'high-quality nature'.</p>	<p>Recently ran the campaign '#together4forests' with Greenpeace and others.</p> <p>Publication of statements and policy papers.</p> <p>Corporate partnerships.</p> <p>Engaging with policymakers.</p>
FERN	NGO that focuses on forests, informs and guides other NGOs on forest-related issues in the EU.	European forests are under pressure. Biodiversity and forests can be protected by strengthening the rights of forest communities and indigenous people.	<p>Seek to establish law enforcement.</p> <p>EU must move from monitoring to mandatory action, with national targets to protect and restore forests across EU.</p>	<p>Broad monitoring of EU work on forests to keep other NGOs informed.</p> <p>Engage with MEPs and Commissioners and focus on developing EU policy expertise whilst doing so.</p> <p>Organise policy tours for partners in forest countries.</p>
Greenpeace	An NGO that analyses and monitors the work of EU institutions. Greenpeace Europe is an independent organisation that does not receive funding from governments or corporations.	Biodiversity must be protected in all its forms.	<p>Sceptic of the EGD, and find that the scope of the EGD is not ambitious enough.</p> <p>Seek to establish law enforcement. New and more transparent targets for forests and nature.</p>	<p>Recently ran the campaign '#together4forests' with WWF and others.</p> <p>Advocacy work of protests and happenings.</p> <p>Publish reports and position papers.</p>

<p>CEPF</p>	<p>An umbrella association of national forest owner organisations in Europe representing private forest owners.</p>	<p>Protect the assets (the trees) of the owners. Protecting biodiversity becomes a means to protect those assets.</p>	<p>Supports the extension of areas protections and restoration measures, despite emphasising that previous such measures have not been well applied.</p> <p>Supports the implementation of market-based approaches such as payment for ecosystems services and financial support mechanisms.</p>	<p>Enables common contributions and opinions of its members (in the form of publications and lobbying activities), and informs its members of current or future issues.</p>
<p>EUSTAFOR</p>	<p>An association of state forest companies, enterprises and agencies that have sustainable forest management and sustainable wood production as major concerns.</p>	<p>State forests provide benefits resulting from their protective statutes. The forests are a resource to be actively used and sustainably managed.</p>	<p>Objectives must be precise and based on sound scientific knowledge and previously agreed definitions.</p> <p>Calls for differentiated solutions: just as there are different causes of forest degradation, there are different management approaches to address the issue.</p> <p>Warns against the danger of 'off-shoring' a greater percentage of the EU's timber supply requirements from outside the EU, where the EU has far less control on the standards being applied.</p>	<p>Research promotion, diffusion of contributions and facilitating exchange among its members.</p>

<p>NABU</p>	<p>German NGO and German partner of BirdLife International. One of the oldest and largest environmental associations in Germany.</p>	<p>Halt the drastic decline of biodiversity through protection and restoration of biodiversity and habitats.</p>	<p>Seek to establish law enforcement, standards, and binding commitments to restore biodiversity to have 'high-quality nature'.</p>	<p>Actively involved in restoration projects in Europe, restoring peatlands in Germany, Poland and the Baltics.</p> <p>Collaborate with BirdLife to promote their agenda internationally.</p> <p>Lobbying activities in Brussels and Berlin. Environmental education.</p>
<p>BirdLife</p>	<p>Global NGO that strives to conserve birds, their natural habitats, and global biodiversity worldwide from 1922.</p>	<p>The world's natural forests are of critical importance for birds and other biodiversity, natural habitats, and ecosystem services.</p>	<p>The future EU Biodiversity Strategy must include a crosscutting legally binding target of fundamental positive sea and land-use change for member states to restore and protect their natural territory.</p>	

Overview of national hydrogen strategies

Country	Sectors	Timeframe	Hydrogen Sources	Measures	Budget
France ⁸	Industry; Power; Transport; Lesser-degree buildings	By 2030: 6GW production capacity	Onshore wind and solar; Unclear position of nuclear	Tax incentives; Direct investment in proof-of-concept projects; Direct investment in gas infrastructure	€1 billion direct investment until 2028; 7 bn EUR until 2030
Germany ⁹	Industry; Transport; Integration in gas grid; Lesser-degree buildings	By 2030: 5GW production capacity By 2040: 10GW production capacity	Focus on offshore wind energy and imports	Progressive carbon taxes; Market facilitation through credit guarantees; Investments in pilot projects; Direct financial incentives for vehicle fleet; EU regulations; Creation of international hydrogen market	€12+ billion
Netherlands ¹⁰	Transport; Industry; Lesser-degree buildings; Integration into gas grid	by 2025: 50 fuel stations, 15,000 fuel cell vehicles; 3,000 heavy-duty vehicles By 2030: 3-4GW installed capacity; 300,000 fuel cell vehicles; 14% aviation fuel (blend)	Blue hydrogen with CCS; Wind energy	Direct support for avoided GHG emissions	< €1 billion direct support; Tax incentives not explicitly quantified

8 Source: Republic of France: Opportunities for Hydrogen Energy Technologies – Considering the National Energy & Climate Plans. Available online: https://www.fch.europa.eu/sites/default/files/file_attach/Brochure%20FCH%20France%20%28ID%209473038%29.pdf

9 Source: Nationale Wasserstoffstrategie. Available online: <https://www.bmbf.de/files/die-nationale-wasserstoffstrategie.pdf>

10 Source: Netherlands Government Hydrogen Strategy. Available online: <https://www.government.nl/binaries/government/documents/publications/2020/04/06/government-strategy-on-hydrogen/Hydrogen-Strategy-TheNetherlands.pdf>

Norway ¹¹	Industry; Transport	Focus on emission reduction targets By 2025: Light vehicles zero emissions By 2050: All transport zero emissions	Blue hydrogen with CCS	Tax incentives; Operational incentives for vehicles	No earmarked budget
Portugal ¹²	Transport; Integration into gas grid;	By 2030: ≥5% transport fuels; 10-15% of gas grid; 1.75-2GW production capacity By 2050: 20-25% transport; 75-80% gas grid; 5 GW capacity	Focus on solar-powered green hydrogen from sea water	Regulation of and targets for integration into gas grid. Financial framework for project support	€7-8 billion
Spain ¹³	Transport; Industry; Export	By 2030: 4GW capacity; Network of ≥150 hydrogen fuel stations; 2 hydrogen train routes in operation	Focus on solar-powered green hydrogen; wind-powered secondary	Regulation for 'guarantee of origin'; Green taxation	€8-9 billion

11 Source: The Norwegian Hydrogen Strategy. Available online: <https://www.regjeringen.no/contentassets/8ffd54808d7e42e8b-ce81340b13b6b7d/hydrogenstrategien-engelsk.pdf>

12 Source: Portugal National Hydrogen Strategy (EN-H2): A new ally for the energy transition in Portugal. Available online: https://www.energias-renovables.com/ficheroenergias/EN_H2_ENG.pdf; Partidario (2020) The H2 strategy in Portugal and the analysis behind it – Most recent developments. Presentation given at the Hydrogen Energy Network Meeting, 26 May 2020. Available online: https://ec.europa.eu/energy/sites/ener/files/documents/1-4_pt_dgeg_2020_the_h2_strategy_in_portugal_analysis_behind_it_-_recent_developments_webminar_hyenet.pdf

13 Source: Government of Spain: Renewable Hydrogen Roadmap. Presentation given at the Hydrogen Energy Network Meeting, 26 May 2020. Available online: https://ec.europa.eu/energy/sites/ener/files/documents/1-2_es_20200526_spain_renewable_hydrogen_roadmap.pdf; Government of Spain: Hydrogen Roadmap: a commitment to renewable hydrogen. Available online: https://www.miteco.gob.es/images/es/h2executivesummary_tcm30-513831.pdf

Actors in hydrogen lobbying

Organisation	Type	Position on hydrogen	Objectives	Strategies
Sandbag Climate Campaign	NGO	Framing: Hydrogen can be a solution to climate change if it is green.	Strong regulation in favour of green hydrogen; Classify CCSU-technologies as non-renewable.	Direct lobbying efforts; Public information campaigns through studies and reports
Climate Action Network Europe	Pan-European NGO – network with around 140 members	Framing: Highly critical of hydrogen. Green hydrogen can be acceptable under a narrow definition.	Strong commitments for fossil fuel phase-out; High ambition towards green hydrogen; Inclusion of other environmental factors into hydrogen classification (eg water footprint); Hydrogen only for energy storage and transport, not for heating.	Direct lobbying; Expert talks; Dissemination of members' studies and reports.
Iberdrola	Multinational utility	Framing: Green hydrogen as a desirable business and industrial model.	High ambition towards green hydrogen regulations and targets; Funding for demonstrators and green hydrogen infrastructure.	Direct lobbying efforts; Influence through national governments; Coalition-building with NGOs and other 'green' industry leaders, eg through joint open letters.
Royal Dutch Shell	Multinational oil and gas supermajor	Framing: Hydrogen as one step towards decarbonisation, in particular as a by-product of refining processes.	Prolong the transition towards green hydrogen; Promote CCUS technologies for hydrogen; Allow hydrogen to offset emissions of refining activities.	Direct lobbying efforts; Contribute to all relevant networks, including Hydrogen Europe and FCH JU.

<p>Hydrogen Europe</p>	<p>European industry association representing much of the hydrogen industry</p>	<p>Framing: Hydrogen as the backbone of Europe's future industrial base.</p>	<p>Promotes all hydrogen technologies; Increase R&D and infrastructure funding for hydrogen.</p>	<p>Direct lobbying efforts; Channel industry interests into the EU policy process and into the FCH JU; Public relations campaigns.</p>
<p>Fuel Cell and Hydrogen Joint Undertaking (FCH JU)</p>	<p>PPP between the EU, industry, and research community</p>	<p>Framing: Hydrogen represents a strategic interest for the EU, combining climate change mitigation energy policy, transport policy and foreign policy.</p>	<p>Long-term strategy towards hydrogen economy and hydrogen-based geopolitics. Non-green hydrogen to be recognised as bridging technologies, including blue and grey hydrogen.</p>	<p>Funding research and industrial projects; Expert groups to develop policy and regulatory proposals; High-level events and meetings.</p>

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Paul is a PhD student in energy macroeconomics from Paris, France. His researches focus on the structural changes our economies need to undertake to move to a low-carbon world. In contrast to mainstream economics, a heterodox standpoint on the issue allows for a realistic vision where the transition is not only a cost to put in balance with other economic benefits, but a thermodynamic necessity as well as an opportunity to rebuild a better economy.

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ABOUT THE FOUNDATION FOR EUROPEAN PROGRESSIVE STUDIES (FEPS)

The Foundation for European Progressive Studies (FEPS) is the think tank of the progressive political family at EU level. Its mission is to develop innovative research, policy advice, training and debates to inspire and inform progressive politics and policies across Europe.

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The Karl Renner Institute is the political academy of the Austrian Social Democratic movement. It is a forum for political discourse, a centre for education and training, and a think tank on the future of social democracy.

In this capacity, it aims at

- establishing a discourse between experts from various fields and the Austrian Social Democratic Party in order to develop and realize new political positions;
- generating a forum for political discussion and thus helping to introduce social democratic positions into the public discussion;
- training representatives of the Austrian Social Democratic Party so that they are optimally prepared for their present and future tasks;
- fostering the organizational development of the Austrian Social Democratic Party in order to open up and modernize party structures.

To this end, the Karl Renner Institute and its nine regional offices (one in each of Austria's federal provinces) organise a broad range of activities: Publications, debate evenings, seminars and lectures, appealing at a politically interested public; special conventions and seminars, targeted at experts, teachers and educators; workshops and consultations for officers, parliamentary representatives and employees of the Austrian Social Democratic Party.

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The FEPS Young Academics Network was established in March 2010 with an aim to gather promising progressive PhD candidates and young PhD researchers ready to use their academic experience in a debate about the Next, Progressive Europe. Realised with the support of Renner Institut in the framework of the FEPS “Next Left” Research Programme, the project has gathered throughout the years more than 250 members – many of whom are today Professors of Renown Universities, Prominent Experts in their respective fields and Front Bench Politicians. Their exchanges and interdisciplinary research at the time of their involvement have resulted in a number of stimulating studies, providing a relevant contribution to the European progressive movement.

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