



Tilburg University

Tilburg Law School – Department: Public Law and Governance

MSc Public Governance: Public Administration, Economics, and Law

EXPLAINING LOBBYING STRATEGIES

Investigating the influence of sustainability
concerns on the Revision of the Energy Taxation
Directive

Submitted by:

Wiebe Beekman (s2022026)

ANR: 653404

Submitted to:

Supervisor: Prof. dr. Martijn Groenleer

Second assessor: PhD Candidate Anaëlle Bueno Patin

Word count: 15965

June 19, 2024

Year of graduation: 2024

Acknowledgments

After months immersed in theory, EU policy, and consultation documents, and many long hours pondering and typing behind the computer, my thesis is now complete. This thesis was created as part of my graduation for the Master's in Public Governance at Tilburg University. It serves as a fitting conclusion to a program that pays attention to the diverse facets of public governance.

There are a few people I definitely need to thank for their support during the creation of this thesis. First, my thesis supervisor, Martijn Groenleer, who guided me throughout the entire process, including providing new perspectives and valuable feedback. For the latter, I am also grateful to Anaëlle Bueno Patin, as my second assessor. The other supervisors and students in the track also helped me by offering opportunities to discuss issues in the research and writing process of my thesis. Additionally, I could not have conducted the research without all the people who made time for an interview. Last but not least, my thanks go to my family and friends, who were a listening ear and encouraged me during the final months.

Abstract

The revision of the European Union Energy Taxation Directive within the framework of the Green Deal presents a diverse case of lobbying strategies employed by both business associations and citizen groups. The thesis aims to uncover how sustainability objectives influence lobbying strategies, which vary between insider (direct engagement with policymakers) and outsider (indirect methods like media campaigns) strategies. The theory is combined with qualitative methods like desk research and interviews to research this topic. Particular emphasis is placed on instances where business associations advocate for sustainability, contrasting traditional explanations of lobbying strategies by business associations. The theoretical framework is grounded in lobbying literature, covering the different lobbying strategies and reasons for adopting a particular strategy. This research offers a fresh perspective on why and how interest groups use different strategies to shape policy outcomes, providing valuable insights for both interest groups and policymakers in the complex world of sustainability-driven policymaking in the EU.

Content

- 1. Introduction** 5
 - 1.1 Background** 5
 - 1.2 Problem** 5
 - 1.3 Research question and aim** 6
 - 1.4 Relevance** 6
 - 1.4.1 Scientific relevance* 6
 - 1.4.2 Societal relevance* 7
- 2. Theoretical framework** 8
 - 2.1 Lobbying** 8
 - 2.2 Lobbying in the EU** 8
 - 2.3 Interest groups** 8
 - 2.4 Lobbying strategies** 9
 - 2.5 Relationship between group type and lobbying strategy** 10
 - 2.6 Policy goal and institutional structure explanations** 10
 - 2.7 Public interest issue** 11
- 3. Methodological approach** 13
 - 3.1 Research design** 13
 - 3.2 Case selection** 13
 - 3.3 Data collection** 14
 - 3.3.1 Desk research* 14
 - 3.3.2 Semi-structured interviews* 14
 - 3.4 Data analysis** 15
- 4. Results** 17
 - 4.1 Revision of the Energy Taxation Directive** 17
 - 4.1.1 The Energy Taxation Directive* 17
 - 4.1.2 Legislative process* 18
 - 4.1.3 Consultations on the proposal* 18

4.1.4 Business associations.....	18
4.1.5 Citizen groups	19
4.2 Lobbying strategies from the interest groups on the revision of the Energy Taxation Directive	21
4.2.1 Administrative strategy	21
4.2.2 Parliamentary strategy.....	22
European Council.....	22
4.2.3 Media strategy	23
4.2.4 Mobilization strategy.....	24
4.2.5 Conclusion of the lobbying strategies.....	25
4.3 Examining the lobbying strategies from interest groups on the Energy Taxation Directive	26
4.3.1 Group type	26
4.3.2 Policy goal.....	28
4.3.3 Institutional character	28
4.3.4 Public interest / sustainability issue.....	29
4.3.5 Conclusion of examination lobbying strategies	31
5. Conclusion and discussion	33
5.1 The influence of sustainability on the lobbying strategies of interest groups on the Energy Taxation Directive	33
5.2 Summary of the results	33
5.3 Theoretical implications	34
5.4 Practical implications.....	35
5.5 Limitations	35
5.6 Avenues for future research	35
References.....	37
Appendix A: Topic list	41
Appendix B: Axial codes	42

1. Introduction

1.1 Background

In the context of European sustainability policies, a case to research different lobbying strategies of interest groups is the policy and lobbying process of the revision of the Energy Taxation Directive (ETD). This policy is part of the Green Deal, an overarching framework devised by the European Commission to foster sustainability and mitigate greenhouse gas emissions (European Council, n.d-b). Large parts of the Green Deal have been adopted, however the revision of the Energy Taxation Directive remains pending, although the process for the policy started in March 2020. The consultation process has ended, with a lot of input from both business associations and citizen groups, and the European Commission has formulated a renewed version. Because the policy covers an intensely discussed and contentious issue, namely the revision of taxes, both private interests and public interests are well represented in lobby and consultation. This is in line with a trend, that underscores increased lobbying efforts of interest groups at the European level (Dialer & Richter, 2019).

Whilst most business associations will lobby for the private interests of their members, notable instances exist where the interests of business associations are more aligned with those of citizen groups on this policy (European Commission, n.d.). In the context of lobbying for the revision of the Energy Taxation Directive, an independent think tank, the Influence Map, underscores that business associations that advocate for private interests, such as Airlines for Europe, use letters directed at European politicians to lobby (Influence Map, n.d.). In contrast, business associations with public interests and citizen groups use the media for lobbying, alongside the consultation form. An example of sustainable business associations advocating through the media is a group statement of eight organizations, such as Wind Europe and Eurelectric (Smart Energy Europe, 2023).

There is ample literature on different tactics or strategies an interest group might employ for its lobbying campaigns. These lobbying strategies range from directly contacting politicians (insider strategy) to mobilizing citizens (outsider strategy) (Binderkrantz, 2005). The type of group that is lobbying is argued to be one of the most important determinants of the strategy opted for by this particular group. Business associations focus on insider lobbying strategies, whilst citizen groups opt for outsider lobbying strategies (Dür & Mateo, 2013). Business associations try to defend the specialized private interests of their member group, consisting of firms (Poletti, De Bièvre, & Hanegraaff, 2016). While citizen groups defend public interests that do not directly benefit their own members (Dür & Mateo, 2013).

1.2 Problem

So, in the literature, there seems to be a distinction between business associations lobbying for private interests through insider lobbying strategies and citizen groups lobbying for public interests with outsider lobbying strategies. However, in the case of policies promoting sustainability some business associations also serve public interests, generating and maintaining social welfare through sustainable objectives. For example, the business association SolarPower Europe (n.d.) states, "Our vision is to lead our members to make solar the core of a smart, sustainable secure, and inclusive energy system in order to reach climate neutrality in the EU well before 2050". This convergence between private and public interests underscores the alignment of sustainability objectives with broader social welfare, a

consensus echoed by scholars who contend that sustainability inherently serves the public interest (Tanguay, Lanoie, & Moreau, 2004).

Research has been done on how issue characteristics can explain the used lobbying strategies, but only in the case of non-governmental organizations (NGOs) the explanatory issues are of a public interest nature (Junk, 2016). Junk argues that issues concerning public goods, such as environmental policies, are much more likely to attract outsider lobbying from NGOs and less insider lobbying. Business associations do to some degree adapt their lobbying strategies in accordance with an issue of public interest, which they try to defend, however part of their lobbying strategy might be 'hidden', especially insider strategies that often can not be observed. The extent to which these strategies are used by business associations or citizen groups will have to be researched to test the relationship between the issue of sustainability and lobbying strategies. However, the factor of group type, and related to this resources, could still have an impact on the lobbying strategies used (Dür & Mateo, 2013). Furthermore, some scholars argue that the policy goals of a certain group (Binderkrantz & Krøyer, 2012) and the institutional character and context influence the chosen lobbying strategies of interest groups (Weiler & Brändli, 2015).

1.3 Research question and aim

With the posed gap, problem, and specific case in mind, the following research question is formulated: *How does the issue of sustainability influence the lobbying strategies of citizen groups and business associations, with similar public interests, on the European Union's revision of the Energy Taxation Directive?*

In order to answer the main research question, two sub-research questions are formulated, firstly to examine which lobbying strategies these interest groups used, and secondly to find out why they chose these particular strategies.

- *Sub-question 1: Which lobbying strategies did interest groups use for their objectives on the revision of the Energy Taxation Directive?*
- *Sub-question 2: Why did interest groups use their particular lobbying strategies on the revision of the Energy Taxation Directive?*

Before the sub-questions are addressed, the policy landscape of the revision of the Energy Taxation Directive will be detailed, incorporating the development of the ETD and the objectives of both citizen groups and business associations on the Energy Taxation Directive.

The aim of the thesis is to investigate the relationship between lobbying strategies and the issue of sustainability. Additionally, this thesis aims to research the puzzle of unexpected correlative lobbying strategies from citizen groups and business associations, with similar public interests. Therefore the exact lobbying strategies of these interest groups will be explored.

1.4 Relevance

1.4.1 Scientific relevance

The research in this thesis delves into the lobbying strategies employed by citizen groups and business associations sharing similar public interests within the European Union. The research examines different factors that can affect the lobbying strategies used and proposes an alternative explanation,

namely that of a sustainability issue, as the main determining factor. Which is in contrast to the current understanding that group type is the most important determinant for a chosen lobbying strategy. In this way, this thesis will contribute to the existing literature on lobbying strategies and their explanations in the European Union's context.

1.4.2 Societal relevance

Besides a scientific relevance, this research also has a societal relevance. The call for more democracy and representation at European institutions necessitates a clearer understanding on the complex stakeholder composition involved in the EU's decision-making process. If European citizens know who, often interest groups, influences the decisions taken by European politicians, and why these interest groups lobby for these specific decisions, they can better understand the outcomes of these decisions. This will not automatically increase democracy and representation in the EU, but it will increase transparency.

2. Theoretical framework

The theoretical framework of this thesis focuses on three topics. Firstly, the core concepts of lobbying (in the EU) and interest groups are defined. Secondly, different lobbying strategies are examined and categorized in order to conduct the research. Finally, four explanations for choosing a lobbying strategy by an interest group are positioned, which inform the answer to the research question.

2.1 Lobbying

Lobbying, or interest representation, refers to the activities carried out with the objective of influencing policy formulation and decision-making processes, with specific interests, concerns, or objectives in mind. Other terms used are advocacy and public policy influence (Salisbury, 1984).

2.2 Lobbying in the EU

What stands out in lobbying in the European Union is that it happens in a highly fragmented context. There are multiple different entry points for interest groups to try and exert influence on policymaking, such as the European Commission, the European Parliament, and the Council of the European Union, as well as through the vast amount of bureaucrats working in Brussels. The openness of European institutions towards interest groups is another characteristic of lobbying in the EU, although some would argue that only 'big' companies or business associations benefit from the access. This has been ascribed to the perceived democratic deficit of the EU. Through more openness, the European Union tries to bridge the gap between citizens and European institutions (Klüver, 2013).

2.3 Interest groups

There is a wide variety of actors that want to insert some influence on (EU) policymaking, this ranges from businesses, non-governmental organizations, and academic think tanks, to national governments. These actors, aside from the national governments, are perceived as interest groups. Interest groups all share the "aim to defend and promote the interests of a greater or lesser part of society vis-à-vis the political authorities or public opinion in general" (Mach & Eichenberger, 2024, p. 337).

Dür and Mateo (2013) break interest groups down into business associations, professional associations, and citizen groups. Professional associations, or trade unions and occupational groups, advocate the interests of specific professions. While, business associations try to defend the specialized interests of their member group, consisting of firms (Poletti, De Bièvre, & Hanegraaff, 2016). Finally, citizen groups "defend interests that are not directly related to the professions of their members or supporters, such as environmental protection or development aid" (Dür & Mateo, 2013, p. 663). These definitions of the interest groups will be used in this thesis.

The group type of an interest group has to be acknowledged because this is recognized as one of the main determinants for the lobbying strategy used. Group type means whether the group consists of businesses, includes professionals as members, or represents a broad array of individuals who anticipate only dispersed benefits from the group's actions. The precise composition of a group corresponds to one of the group types previously outlined. Although the material resources of a certain group are important to consider as well and can be a correlative factor (Dür & Mateo, 2013). Other scholars draw attention to the actual policy goal of the interest group determining the chosen strategy. (Binderkrantz & Krøyer, 2012), or to the importance of the institutional structure and context (Weiler

& Brändli, 2015). Finally, the specificity of an issue, whether it is a public interest, might influence the lobbying strategies of interest groups (Junk, 2016).

2.4 Lobbying strategies

A lobbying, or policy influencing, strategy, means “the combination of modes of action used by an interest group to attain its goals” (Grant, 1978, p. 2). The most commonly used distinction in lobbying strategies of interest groups is that between the insider strategy and the outsider strategy. These strategies are believed to influence the access of different groups to policymaking. Although groups typically use one of these strategies, using a blend of both is increasingly used, especially at the EU level (Binderkrantz, 2005).

Broadly speaking, insider strategies mean the direct participation of an interest group in the political process through consultation. Privileged access is argued to be important in securing this access, however, politicians are also open to consultation by groups with fewer access opportunities as these groups might possess knowledge or resources helpful to the politician (Maloney, Jordan, & McLaughlin, 1994). Therefore, having expert knowledge is considered valuable for interest groups, especially in policy areas that are technically difficult. Beyers (2004) calls this the access strategy, as part of the insider strategy, and he considers it a way of exchange and transmission. In return for their knowledge interest groups expect a favorable disposition from the politician that supports the groups’ interests. However, Maloney, Jordan, and McLaughlin (1994) argue that access, in the form of consultation, is not equivalent to influence. They argue only interest groups with privileged access have bargaining power and are able to negotiate.

Binderkrantz (2005) presents an exhaustive distinction between lobbying strategies, which serves as the foundational framework for the conceptualization and operationalization of this thesis. Table 5 outlining this categorization into a coding scheme can be found in the methods section. Within the insider strategy, Binderkrantz further delineates two distinct categories: the administrative strategy and the parliamentary strategy. The administrative strategy consists of “actions directed toward bureaucratic actors”. Interest groups might “contact the relevant minister or national public servants”, “actively use public committees, etc.”, or “respond to requests for comments” (Binderkrantz, 2005, p. 696). The parliamentary strategy is defined as “actions targeting politicians and parties”. This could involve “contacting parliamentary committees, party spokespersons, party organizations, or other members of parliament” (Binderkrantz, 2005, p. 696).

In contrast to the insider strategy, interest groups engaged in outsider lobbying strategies do not use or do not have direct access to policymakers. “Outside lobbying addresses policy makers indirectly. Instead of seeking direct access, advocates mobilise and seek to raise the awareness of a broader audience by communicating their political message through various sorts of public media” (Hanegraaff, Beyers, & De Bruycker, 2016, p. 569). An implication of heightened visibility associated with an outsider strategy is that an interest group can effectively communicate to its supporters their lobbying efforts and achievements. Another consequence is that the public debate is sparked, which might lead to increased pressure on policymakers. An ‘extreme’ manifestation of outsider lobbying were the farmers’ protests spreading across Europe and even occurring in Brussels, the heart of the European Union. The escalation of these protests accumulated in concessions by the European Commission to drastically reduce sustainability obligations for farmers (Hancock & Bounds, 2024).

Binderkrantz (2005) further divides the outsider category into strategies directed toward media and strategies that aim to mobilize members or citizens. The former includes “contacting reporters”, “writing letters to the editor and columns”, “issuing press releases and holding press conferences”, and “publicizing analyses and research reports” (Binderkrantz, 2005, p. 696). The latter strategy is composed of “arranging public meetings and conferences”, “organizing letter-writing campaigns”, “arranging strikes, civil disobedience, direct action and public demonstrations”, and “conducting petitions” (Binderkrantz, 2005, p. 696).

Table 1.

Visualization of lobbying strategies

Insider strategy		Outsider strategy	
<i>Administrative strategy</i>	<i>Parliamentary strategy</i>	<i>Media strategy</i>	<i>Mobilization strategy</i>
Efforts aimed at bureaucratic actors	Efforts aimed at politicians and parties	Influencing via media engagement	Influencing through grassroots actions

2.5 Relationship between group type and lobbying strategy

As mentioned, Dür and Mateo (2013) argue that group type plays a significant role as one of the primary determinants influencing the strategic approach employed by interest groups in lobbying efforts. They argue group type also influences the effect of material resources and consequently the lobbying strategy. In their survey, the authors concluded “that the distinction between business associations, professional associations, and citizen groups explains a considerable part of the variation across groups in the choice of strategy” (Dür & Mateo, 2013, pp. 676-677).

Business associations are more likely to engage in insider tactics, facilitated by their often larger staff and technical knowledge. The insider strategy is further rationalized by the limited and distinct membership composition of business associations, facilitating a more direct identification of lobby successes without the impediment of competition between the different members of the association (Binderkrantz, 2005). This is in contrast to citizen groups who have fewer resources and knowledge at their disposal and defend the interests of a broad public. Besides a lack of resources and knowledge, citizen groups have a preference to use outsider tactics for their organizational survival. Without the publicity of the outsider strategy through media attention, strikes, etcetera citizen groups lose the support and engagement of their members (Dür & Mateo, 2013).

2.6 Policy goal and institutional structure explanations

However, it is important to consider that other factors can also influence the lobbying strategies. Binderkrantz and Krøyer (2012) researched how policy goals influence interest group lobbying strategies. They concluded that groups advocating for broad interests primarily focus their lobbying efforts on parliaments and the media, whereas groups pursuing complex objectives tend to engage in more intense direct lobbying toward bureaucrats. When a policy goal is more dividable, which means that there are multiple options to reach a goal but agreeing on a comprise is difficult, groups employ all types of influence strategies.

Another explanation proposed is that the institutional structure impacts the lobby strategies of interest groups. Interest groups in countries with more direct democratic instruments, such as referendums, are more likely to be directly engaged in the policymaking process, compared to countries where direct democratic instruments are less common. However this effect is only found in citizen groups, as the same pattern is not observed among business associations (Weiler & Brändli, 2015).

However, both the policy goal explanation and the institutional structure explanation do not apply to the research of lobbying strategies in the revision of the Energy Taxation Directive because it is a single policy in one place. These two explanations only help to explain the differences in lobbying strategies between different policies or between different institutional structures. So there must be another explanation.

2.7 Public interest issue

Therefore, an alternative explanation is proposed by Junk (2016) to clarify lobbying strategies. In examining the dynamics of lobbying strategies employed by non-governmental organizations (NGOs) and citizen groups, Junk offers a thought-provoking perspective. She suggests that these groups' advocacy approaches are intricately linked to the specific policy issues they seek to address. For instance, when confronted with matters of public interest, such as environmental conservation or social justice, citizen groups often adopt an "outside lobbying" approach. This entails engaging with the broader public, mobilizing grassroots support, and exerting pressure on policymakers through public demonstrations, petitions, and media campaigns.

The rationale behind this outsider lobbying strategy lies in its ability to amplify the voices of ordinary citizens and grassroots movements, thereby exerting considerable influence on policy outcomes. By leveraging public opinion and mobilizing mass participation, citizen groups effectively challenge the status quo and push for policy reforms aligned with broader societal interests. This grassroots activism often serves as a powerful counterbalance to entrenched interests and institutional inertia, driving progressive change and promoting democratic accountability. However, it is important to recognize that not all lobbying efforts are driven solely by altruistic motives or public interest considerations. Business associations, for instance, may pursue lobbying strategies aimed at advancing their private interests, such as securing favorable regulatory frameworks or protecting market dominance. Despite this, there are instances where business associations may also find alignment with public interests, particularly when advocating for policies that promote long-term economic sustainability or address pressing social concerns.

This convergence of interests between private actors and the public good reflects the principles of the collective action theory, as elucidated by Olson Jr. (1965). According to this theory, groups seeking to advance their interests must offer incentives beyond their immediate objectives to attract widespread support and achieve collective goals. In the context of lobbying, this could entail businesses aligning their advocacy efforts with broader societal objectives, such as advancing public sustainable objectives or addressing systemic challenges like climate change.

However, defining public interest can be challenging due to its subjective nature, yet it fundamentally revolves around the generation and maintenance of overall social welfare (Rekosh, 2005). Public interest, in essence, encompasses the collective well-being and welfare of the populace, often

transcending individual or private interests. However, pinpointing specific actions or policies that unequivocally serve the public interest can be complex, as it involves navigating diverse societal needs, values, and priorities. In light of this complexity, public interest theory, as articulated by Tanguay, Lanoie, & Moreau (2004), provides a guiding framework. According to this theory, governments are justified in intervening in the economy when externalities, such as pollution, create barriers to optimal resource allocation. Externalities refer to the unintended consequences of economic activities that affect parties not directly involved in the activity, often leading to market inefficiencies. Pollution, for instance, imposes costs on society in the form of environmental degradation and health hazards, which are not reflected in market prices. Consequently, intervention becomes necessary to address these market failures and safeguard the public interest.

Drawing from this theoretical foundation, it becomes apparent that sustainability and climate change policies are inherently aligned with the public interest. By mitigating environmental degradation, promoting renewable energy sources, and fostering resilience to climate impacts, these policies contribute to the long-term well-being and prosperity of society as a whole. Furthermore, they address pressing global challenges that transcend national borders, underscoring their significance in promoting global public goods.

Given the critical importance of sustainability and climate action in advancing the public interest, it follows that advocating for these policies becomes a compelling lobbying strategy for both business associations and citizen groups. By aligning their advocacy efforts with overarching societal goals, these groups not only demonstrate their commitment to social responsibility but also enhance their credibility and influence in shaping policy decisions.

Table 2.
Visualization of factors for lobbying strategies

Group type	Type of organization lobbying (e.g. business association, citizen group)
Policy goal	Objectives of the policy (e.g. undivided versus divided)
Institutional structure	Political system influencing engagement in policymaking
Public interest / sustainability issue	Issues perceived as serving broader societal welfare (e.g. climate change policies)

3. Methodological approach

3.1 Research design

The puzzle of different lobbying strategies in the case study of the revision of the Energy Taxation Directive necessitates a qualitative research approach. This methodological approach enables a thorough exploration of the complex motivations, tactics, and relationships of the different involved interest groups, enabling a comprehensive understanding of the dynamics at play. The research question seeks to investigate the phenomenon of the factors informing lobbying strategies, which is the dependent variable in the case, and explain the observance of these. By employing abductive analysis, the researcher can iteratively navigate between theory, field experience, and analysis to provide insights into phenomena that may initially appear inexplicable (Bryman, 2012). The majority of the theoretical background was already examined at the beginning of the research, which has informed the coding schemes and the topic list for the interviews. However, during the phase that the interviews were conducted, it was worthwhile to revisit the theory to better understand the results of the interviews.

The research investigated business associations and citizen groups, which lobby strategies they employed and why. Due to data and time restraints and to keep the research feasible, the selected business associations and citizen groups are considered to be typical examples within their respective group types concerning the specific topic (Seawright & Gerring, 2008). However, generalizability beyond this policy is problematic, although similar dynamics may be observed in other sustainable policies. First of all, desk research was used to prepare for the interviews and complement its findings. After that, to study the research question and the organizations, interviews were conducted. Interviewing is considered to be the most appropriate and useful method, in particular the semi-structured interview. Combining both desk research and interviews, in a concurrent way, provides a more holistic approach to the data and increases credibility (Carter, Bryant-Lukosius, DiCenso, Blythe, & Neville, 2014; Bryman, 2012). The interviews primarily informed the results section and the conclusions. Additionally, an expert on EU energy policy, from Jacques Delors Energy Center, was interviewed to discuss the results and collect an 'outside' perspective. The expert's opinions were integrated into the concluding remarks of the separate sub-questions, as well as in the overarching conclusion.

3.2 Case selection

The case selection for the Energy Taxation Directive was informed by the observation that a lot of both (sustainable) business associations and citizen groups provided input on the feedback page for consultation on the directive (European Commission, n.d.). On top of that, it is a directive that generates disagreements and contrasting positions between sustainably driven organizations and organizations lobbying for the fossil industry, presenting a contentious case between public and private interests on the always heated topic of taxation. Therefore, the directive compellingly represents the distinct tensions apparent in European climate policies.

In addition, the revision of the Energy Taxation Directive is of paramount importance for the climate goals set by the EU. The ETD has put minimum tax rates for motor fuels (gasoline, diesel, kerosene, liquefied petroleum gas) and natural gas, as well as for heating fuels (diesel, heavy fuel oil, kerosene, LPG, natural gas, and coal/coke) and electricity. In the current version, the more polluting fuels of diesel and coal are favored with tax minima, due to setting the tax rate based on volume (Parry & Vollebergh,

2017). Whilst there are also full tax exemptions for certain industries, such as aviation and shipping. This does not contribute to phasing out fossil fuels and promoting renewable energy sources. In a revision of the Energy Taxation Directive, the suggestion is to base the tax rate on the real energy content and environmental performance of the energy source and lift the exemptions (European Commission, 2021b). The revision would, at least in the short term, lead to higher energy prices, due to the current dominant reliance on fossil fuels. This causes concerns among policymakers, who are wary of the consequences for (vulnerable) households and energy-intensive sectors (Smith, 2017). Therefore, the European Union is still talking about the ETD and its revision is pending.

3.3 Data collection

3.3.1 Desk research

The main source for the desk research consists of the consultation documents interest groups have submitted on the feedback page of the European Commission (n.d.). Obtaining more (background) knowledge on the specific position an organization took on the policy helped to outline the lobbying landscape on the revision of the Energy Taxation Directive. Furthermore, the analysis of the consultation documents submitted by the interest groups was helpful in the interviews. As this allowed to ask more detailed questions on why the organization lobbied for a specific point in the feedback they provided in their consultation document.

Additionally, an internet search was performed on the Energy Taxation Directive, which revealed media coverage, statements, or reports. This desk research was used to gain more insight into the different lobbying strategies, especially the outsider strategy, which is largely observable in the media or in online databases. Both the consultation documents and the additional online data are referenced throughout the results section.

3.3.2 Semi-structured interviews

An important difficulty in the research of lobbying is the often hidden nature of how interest groups lobby (Lacy-Nichols, Quinn, & Cullerton, 2023), especially in the case of interest groups using an insider lobbying strategy (Binderkrantz, 2005). Using qualitative interviewing has a few advantages that will help to generate useful data in answering the research question on the usage of (different) lobbying strategies. The main advantage is that it can potentially solve the hidden nature of lobbying practices, conducting interviews offered the opportunity to ask interest groups questions on how they lobbied on the revision of the Energy Taxation Directive policy. If an interest group only lobbied behind back doors, this information would not have become available with only researching online databases. The advantage of using a semi-structured approach for the interviews is that this allowed the interviewer to guide the interview through a topic list, found in Appendix A, to cover the factors influencing the lobbying strategies. As well as, the different categories of lobbying strategies, namely the administrative and the parliamentary strategy (insider strategies) and the media and mobilization strategy (outsider strategies) (Binderkrantz, 2005). While also ensuring enough opportunities for flexibility for asking follow-up questions and deviating from the order of questions, resulting in more comprehensive results, although one should be aware of the potential of self-reported lobbying activities during the interviews (Bryman, 2012).

To find the participants for the interviews, the feedback page from the European Commission for the revision of the Energy Taxation Directive was consulted (European Commission, n.d.). On this page, all those interested were able to give their feedback on the initial policy proposal. From the list of reactions, several business associations and citizen groups, both supporting public interests, were contacted for an interview. Preferably, all five big sources of renewable energy (solar, wind, biomass, geothermal, hydro) and electromobility would have been represented in the interviews, which would lead to a representative sample of the renewable energy sector. The Green 10, a coalition of the largest environmental organizations in Europe, was used as a reference point for the citizen groups and the aim was to conduct approximately as many interviews with citizen groups as with business associations. Interviews were held online, before the interview started it was important to stress confidentiality and anonymity. The time period for the interviews was approximately two months, which left sufficient time for conducting the interviews but also for writing the results.

After reaching out to the organizations that were selected to provide a representative sample of both the business associations and citizen groups, nine organizations (table 3) agreed to be interviewed. With each of these nine organizations, 6 business associations and 3 citizen groups, one interviews was conducted for approximately 30 to 60 minutes. The transcribed interviews with the organizations can be found in Appendix C, in the sequence displayed in table 3. In Appendix D a transcript of the interview with the EU energy policy expert is provided.

Table 3.

Interviewed organizations

Interview number	Business association	Interview number	Citizen group
1	Bioenergy Europe	7	ClientEarth
2	European Renewable Energy Federation (EREF)	8	European Environmental Bureau (EEB)
3	Hydrogen Europe	9	Transport & Environment (T&E)
4	SolarPower Europe		
5	The European Association for Electromobility (AVERE)		
6	WindEurope		

3.4 Data analysis

The interviews were recorded and transcribed with the help of AI-tools. This is the first step of the data analysis. Both the transcribed interviews and the found documents were then open-coded, in this stage, all relevant information was highlighted and a general open code was given to these highlighted segments, a total of 286 quotes were highlighted and open-coded. After this, the open codes were coded into categories using axial coding, the categories are formulated in accordance with either an operationalization of the different factors influencing the lobbying strategies presented in table 4, or consistent with those proposed by Binderkrantz (2005), explained in the theoretical framework, and depicted in table 5 (Binderkrantz, 2005, p. 696). Table 5 presents the two main lobbying strategies of insider and outsider and further breaks this down into four subcategories, which all have multiple examples of how this strategy can be observed. The final step was selective coding, which allowed for

the evaluation of the categories and comparison between them (Bryman, 2012). In the case one of the open codes clearly does not fall into one of the axial coding categories, the open code was more precisely defined and was used later on to inform the results part. All the used axial codes can be found in Appendix B.

Table 4.

Operationalization of factors for lobbying strategies

Selective code	Operational definition
Group type	Material resources, staff size, technical knowledge, membership composition, organizational survival
Policy goal	Broad or specific goal, dividable goal
Institutional structure	Amount of direct democratic instruments (e.g. referenda)
Public interest / sustainability issue	Social benefit, specificity of a case of sustainability

Table 5.

Operationalization of Influence Strategies and Examples of Activities

Insider strategies		Outsider strategies	
<i>Administrative strategy</i>	<i>Parliamentary strategy</i>	<i>Media strategy</i>	<i>Mobilization strategy</i>
Contacting the relevant minister	Contacting parliamentary committees	Contacting reporters	Arranging public meetings and conferences
Contacting national public servants	Contacting party spokespersons	Writing letters to the editor and columns	Organizing letter-writing campaigns
Actively using public committees, etc.	Contacting other members of parliament	Issuing press releases and holding press conferences	Arranging strikes, civil disobedience, direct action and public demonstrations
Responding to requests for comments	Contacting party organizations	Publicizing analyses and research reports	Conducting petitions

Note: Reprinted from “Interest group strategies: Navigating between privileged access and strategies of pressure”, by A. Binderkrantz, 2005, *Political Studies*, 53, p. 696. Copyright 2005 by Political Studies Association.

4. Results

4.1 Revision of the Energy Taxation Directive

In the first section of the results, the need for the revision of the Energy Taxation Directive is positioned and the legislative process of this file is explained. After this, the consultations from the organizations researched in this thesis were analyzed to find out what objectives they had in the revision of the Energy Taxation Directive and what their critiques on the proposal were. The analysis also helped to prepare for the interviews with the different organizations. In the latter section the objectives from both the business associations and the citizen groups are presented, these objectives were for the majority found in the consultations, but are also supplemented by some findings from the interviews.

4.1.1 The Energy Taxation Directive

The revision of the Energy Taxation Directive (ETD) is part of the European Green Deal and the Fit for 55 legislative package. The Fit for 55 package is a set of European proposals that together aim to achieve the EU's target of a 55% reduction in net greenhouse gas emissions by 2030. Regarding energy taxation, the European Union stipulates that energy taxation should reflect the EU's energy, environmental and climate policies, preserve and improve the internal market, and preserve the capacity for member states to generate revenues for their budgets (European Council, n.d-a).

The current Energy Taxation Directive is outdated. It was published in 2003 and needs adaptation in order to align with the EU's climate goals. In the current (old) version of the ETD, the less carbon-intensive and more renewable energy sources are taxed as high as the fossil equivalent. And bioenergy is further disadvantaged due to the current taxation method based on volume. This way of taxing energy does not provide enough incentives to scale-up investments in clean technologies and accelerate the renewable energy transition. Furthermore, fossil fuels still enjoy significant tax exemptions and reductions. Especially the aviation and shipping sectors are insufficiently taxed to meet CO₂ reduction objectives. On top of that, there exist considerable divergencies between member states in tax rates on electricity and natural gas. This does not allow for a harmonized internal EU energy market and risks companies and individuals to move to less taxing countries, which does not incentivize them to decarbonize (European Commission, 2021a).

Therefore, the European Commission proposed a revision of the Energy Taxation Directive in 2020 and an updated proposal in 2021. The main changes formulated in the proposal are, firstly to switch from volume to energy-based taxation. Secondly, to remove the current exemptions and incentives for fossil fuels. And thirdly, to introduce a four-tiered rates system based on the environmental performance of energy products (only those used as motor or heating fuels) and electricity. The highest (total) rate is for 'normal' fossil fuels, such as gas, oil, and petrol. The next rate (two-thirds of the total rate) applies to fossil fuels that are less polluting and have some potential to contribute to the decarbonization process (for example natural gas), this is for a period of 10 years, after which the rate will increase. The next rate is (half of the total rate) for sustainable but not advanced biofuels. And the final and lowest rate (significantly below the total rate) applies to electricity, advanced biofuels, bioliquids, biogases, and renewable hydrogen. Together these changes will align the Energy Taxation Directive with the EU's climate goals. However, there are still some exceptions the Commission articulates in the directive, namely to have transition periods for some sectors, such as aviation, and for the heating of (vulnerable) households. The Commission also proposes that member states can further support households by

using the increased energy tax revenues to offset their increased energy bills (European Commission, 2021a).

4.1.2 Legislative process

The decision on the approval of the revision of the Energy Taxation Directive resides within the responsibilities of the Council of the European Union, informally known as the Council, the terminology that will be used hereafter. In this EU body, the government ministers from all EU member states come together to discuss, amend, and adopt laws. Within the Council, the decision on the ETD rests with the Economic and Financial Affairs (Ecofin) configuration, composed of economics and finance ministers of the member states. The final decision on the revision of the ETD needs unanimous approval, due to its classification within the realm of taxation. The most recent attempt to come to an agreement was on the 25th of April 2024, when the Belgian Presidency put forward their second proposal for the ETD. However, there was no agreement between the political parties (Messad, 2024). Because the revision of the ETD is decided through unanimity in the Council it becomes less likely that it will be adopted. Achieving an agreement on the revision of the ETD necessitates a considerable degree of compromises from all EU member states. And whether this agreement will be as progressive as envisioned from the start remains doubtful.

This is corroborated by an expert in EU energy policy, who argues that the development of the Energy Taxation Directive is one of compromise. The expert does not expect this compromise to be as progressive and sustainability-driven as the initial proposal. However, a compromised revision would be better than nothing and would keep the EU's climate targets for 2040 and 2050 in sight. And it would, "send a strong political signal that we at least want to make things work and change, despite it not being the perfect solution" (interview Expert).

4.1.3 Consultations on the proposal

This initial proposal by the European Commission, in the form of an inception impact assessment, was opened up to consultation for organizations and individuals. In the first feedback period, from March 4 2020 until April 1 2020, 180 consultations were provided. After this the European Commission released a new proposal, which was a more detailed description of the revision. This proposal was again opened up to consultation. In this feedback period, from July 22 2021 until November 18 2021, 202 consultations were provided. There is significant overlap in the organizations that reacted to these consultations since individuals and organizations were both interested in and critical of the first as well as second version. The consultations provided in the second feedback period offered more insights since the organizations had a more elaborate version for response from the European Commission (European Commission, n.d.).

4.1.4 Business associations

In the second feedback period, 105 business associations provided consultation, which is 51.98% of all the organizations that reacted. The consultations from the six business associations outlined in the methods section were analyzed. The extent of the directive to which they had objectives for their lobbying campaigns differed per organization. The European Renewables Energies Federation (EREF) pursued objectives that covered almost all topics of the Energy Taxation Directive, corresponding with their broad member base, and were therefore one of the more active business associations lobbying on this particular directive (interview EREF). Whereas the European Association for Electromobility

(AVERE) and Bioenergy Europe did not prioritize their lobby on the Energy Taxation Directive, so they only lobbied for the objectives most important to them (interview AVERE). For example, Bioenergy Europe heavily lobbied to get biomass exempted from Article 2 in the ETD (interview Bioenergy Europe). All the researched business associations were supportive of the revision of the Energy Taxation Directive and the climate goals of the EU it will help to achieve, they see the revision as a central component in the EU's energy transition. As WindEurope (2020, p. 1) stated, "Energy taxation can give clearer price signals to support decarbonisation and the energy transition". Whilst other business associations representing the fossil fuel industry, or those relying on fossil fuels, for example aviation, do not support the revision and want to keep the exemptions in the directive from which they profit. The major change in the revision, that energy will be taxed on energy content instead of based on volume, has an enormously beneficial impact on renewable energy sources. The new taxation method would increase their competitiveness vis-à-vis fossil energy sources. Therefore, the researched business associations are eager to ensure that this change is reflected in the final version and is quickly implemented.

Nevertheless, the researched business associations do have some critiques and suggestions on how the current proposal could be improved. Some of these were shared amongst all, or most, of the associations. For example, all of them approved the removal of fossil fuel subsidies that were mentioned in the Commission's proposal. However, the researched associations highlight that not all subsidies are removed, such as the exemptions for business and pleasure flights. Furthermore, an issue that is particularly important for renewable energy is to avoid double taxation. Double taxation is, "whereby one must pay for the electricity entering the storage facility and then pay once again as an end-consumer" (EREF, 2020). This issue is not sufficiently addressed, which is especially problematic for the battery sector, but is something that all renewable energy companies will feel the consequences of. A final important collective critique to highlight is the call by the business associations to further increase investments in renewable energy and support research into clean technologies.

However, there were also some critiques and suggestions to which only one of the business associations paid attention. These points were often connected to the particular industry of their organization. For example, Bioenergy Europe (2021, p. 1) argued for the statement that, "sustainable biomass fuels are the most affordable replacement of fossil fuels in the heating sector". They argue that this is because it is the most cost-competitive and easy to scale up. And therefore sustainable bioenergy should be promoted more. The other associations primarily promote their own industry, since they see their own energy source as the best option. Hydrogen Europe (2021) urges the EU to recognize the big role hydrogen can play in heating and motor fuel. Interesting in this argument is the position that EREF (2020) takes, because this is the federation representing all national renewable energy associations from EU member states. They do not argue for a particular energy source in their consultation, as long as it is sustainable (AVERE, 2020; SolarPower Europe, 2021)

4.1.5 Citizen groups

In the second feedback period, 7 non-governmental organizations and 1 environmental organization provided consultation, which together is 3.97% of all the organizations that reacted. The consultations from three of these organizations, as delineated within the methods section, were analyzed. Overall, the citizen groups actually push the EU to commit itself to even more ambitious targets. The European Environmental Bureau (EEB, n.d.) strives to increase the 2030 emission reduction target to 65%

compared to 1990, instead of the EU’s own target of 55%. This also comes back in the wording of their consultation, “achieving climate-neutrality by 2050 at the latest” (EEB, 2020, p. 1). Removing fossil fuel exemptions and subsidies is also one of the primary concerns for the citizen groups. Transport & Environment (2020) reasons that the kerosene tax exemption for aviation should be addressed by introducing an EU-wide kerosene taxation. According to them, this would, when applied to all inbound and outbound flights in Europe, reduce aviation emissions by 11%, as well as generate 27 billion euros of revenue. During the interview with Transport & Environment, it became clear that its primary focus is on the aviation sector, which they regard as the sector that has not been dealt with properly yet in the EU’s efforts for climate neutrality (interview Transport & Environment). For the shipping sector, Transport & Environment does acknowledge that including this sector in the EU Emissions Trading Scheme (ETS) is a better solution than an EU-wide tax. ClientEarth (2020) specifically focuses on removing fishery subsidies from the ETD, they provide analyses from researchers that categorize fisheries subsidies as harmful, contributing to overfishing. This reflects the broader focus of ClientEarth, not only on promoting de-carbonization but also on fostering our ecosystems.

An argument that the citizen groups prioritize more than the business associations is the social and economic benefits of a revision of the ETD. In particular, the citizen groups argue that the revenues generated by ending fossil fuel exemptions should be used to support households in the energy transition or to promote electromobility. The European Environmental Bureau (EEB, n.d.) even suggests to use these revenues to directly reduce labor taxation. Or that the money can be used to incentivize companies and people to embrace new technologies (interview EEB). ClientEarth (2020, p.3) proposes a similar suggestion, “the polluter pays principle”, this policy concept requires entities responsible for pollution to bear the costs of its prevention, control, and remediation. The importance of addressing the energy transition is further highlighted by the call for regular evaluation of the National Energy and Climate Plans by the European Commission, which should be aligned with climate objectives and can repair observed discrepancies in energy taxation between member states (EEB, n.d.).

An observable difference between the business associations and the citizen groups is that the citizen groups do not specify any preferences toward a certain sustainable energy source, provided it constitutes a genuinely sustainable energy source. Therefore, in their consultation papers, the focus is less on the technical qualifications and advantages of certain energy sources and more on the overall climate ambitions that sustainable energy helps to achieve. Table 6 provides a summary of this thesis’s analysis of the consultation papers from research interest groups.

Table 6.
Consultations from the (researched) interest groups

Business associations	Citizen groups
Participation: 105 associations, 6 analyzed	Participation: 7 NGOs and 1 environmental organization, 3 analyzed
General support: Support revision and EU climate goals, view it as crucial for energy transition	General support: Advocate for more ambitious targets to accelerate the transition to climate neutrality
Key change support: Favor shift to taxing energy content, benefiting renewables, addressing double taxation	Key change support: Strongly support removing fossil fuel exemptions and subsidies

Table 6. (Continued)

Business associations	Citizen groups
<p>Common critiques:</p> <ul style="list-style-type: none"> - Remove fossil fuel subsidies but address all, including flights - Avoid double taxation - Increase investments in renewables and clean tech research 	<p>Common critiques:</p> <ul style="list-style-type: none"> - Remove all fossil fuel exemptions and subsidies - Use revenue to support households, promote electromobility, and reduce labor taxation
<p>Focus and priorities:</p> <ul style="list-style-type: none"> - Promote specific energy sources - Technical qualifications and advantages of their energy sources 	<p>Focus and priorities:</p> <ul style="list-style-type: none"> - No specific energy source preferences - Emphasize overall climate ambitions and benefits of sustainable energy

4.2 Lobbying strategies from the interest groups on the revision of the Energy Taxation Directive

In the second section of the results, sub-question one, *Which lobbying strategies did interest groups use for their objectives on the revision of the Energy Taxation Directive?*, will be answered. This section is divided into the different lobbying strategies, starting with the administrative and parliamentary strategy, as insider lobbying strategies, followed by the two outsider lobbying strategies, the media strategy and the mobilization strategy.

4.2.1 Administrative strategy

The first step for all the interest groups, both the business associations and the citizen groups, was to provide their feedback through the consultation process of the European Commission, the exact objectives in their consultation papers have already been discussed in the previous section. The opportunity for consultation is an instrument inherently part of a democracy and in the case of the European Union an institutional tool directed at the European Commission (interview T&E). Using consultation is regarded as an administrative strategy, part of the insider strategies. Worth highlighting is that the whole lobby process is regarded as a more accessible and streamlined procedure when an interest group provides their feedback. Since this was the first opportunity to get in touch with the European Commission and present them with the objectives of the particular organization (interview AVERE).

The usefulness of the consultation process for interest groups is showcased by EREF, which has made the whole consultation process a core part of their lobbying strategy. The first step of their strategy is to meet with the European Commission to understand what they want out of a policy, in this case the Energy Taxation Directive, and what information from stakeholders they need for this. After this, EREF, together with its members, determines its position and presents this through their consultation and directly to the Commission. When the Commission subsequently publishes a new version of the policy proposal, EREF examines if their suggestions for improvement were taken into account and are observable in the new proposal (interview EREF).

A similar tool to the consultation process is the position paper, however the difference is that the position papers were used to address specific parts of the policy, but both tools are categorized as administrative lobbying strategies. Position papers were used by multiple interest groups to explain the importance of certain aspects and possible improvements in the revision of the Energy Taxation

Directive to policymakers. In the case of business associations, these position papers are frequently drafted together with their national associations in the different EU member states. After the position paper has been drafted, these national associations use it to directly contact their national administrations (interview Hydrogen Europe). Or even to contact their national representatives in Brussels, Bioenergy Europe (interview) mentioned that, “our national associations were quite successful in reaching to some experts in the working party on indirect tax questions”. Furthermore, EREF (interview) stated that “most of the work is done in position papers”. And, although not through other members, the citizen groups also used position papers to influence policymakers. On a national level, ClientEarth (interview) also met with multiple policy advisors from ministries, this could have been either the energy ministry, climate change ministry, or fiscal ministry, depending on who in the particular member states was responsible for the energy taxation file.

Through both the consultation process and the position papers the interest groups can exchange their technological knowledge on certain aspects of the ETD with the bureaucrats in the EU responsible for drafting the legislation. The business associations aggregate their knowledge predominantly from the various companies part of their association. Whilst the citizen groups often have a staff comprising of individuals with knowledge of politics, judiciary, and technology, or otherwise they interact with outside expertise, often with think tanks. This exchange is perceived by both the interest groups and policymakers as mutually advantageous, technological knowledge that would have been difficult to gather by the bureaucrats themselves is exchanged for the opportunity to have direct input in the policymaking process.

4.2.2 Parliamentary strategy

European Council

The second insider strategy is the parliamentary strategy. Since this strategy is more about directly contacting politicians that make the final decisions, the lobby of interest groups has focused on the Council, where the final decision on the ETD is taken. And on the member states who, through their government ministers, exert significant influence over the adoption of the ETD. Therefore, the lobbies from interest groups have also substantially been targeted either directly at the permanent representatives from EU member states in Brussels or more indirectly at the member states, in their national capitals. “The permanent representation of the national states in Brussel, they were the most important targets of our advocacy in this file” (interview EEB).

For some organizations, but especially for citizen groups, it was difficult to interact with and lobby the Council members, which is considered an EU body where green non-governmental organizations (NGOs) have fewer possibilities to exert influence (interview T&E). However, a business association also encountered challenges reaching the Council, especially the highest level of member states’ economic and finance ministers. Once they had a meeting with members of the Council, it usually was with taxation experts who were advising the ministers. Most of these experts do not have extensive knowledge of all facets of renewable energy, so AVERE for example had to explain the basics of bi-directional charging. To overcome some of these difficulties, they worked with a coalition of like-minded organizations, all wanting to accelerate the electrification of society, in the Electrification Alliance. The collective effort of a coalition consisting of a broad array of renewable energy organizations helped their voices to be heard in the Council (interview AVERE).

An important role in the Council is appointed to the Council's Presidency, "they are supposed to remain neutral to make bilateral talks with every member state and to, you know, move the text towards an agreement" (interview T&E). Therefore, all the interest groups tried to actively engage with the Council Presidency in office. During the negotiations for the revision of the Energy Taxation Directive Spain primarily fulfilled the role of the Council Presidency and Bioenergy Europe mentioned to have had several discussions with representatives from the Spanish Council Presidency. The meetings and discussions continued under the current Council Presidency of Belgium and were perceived as successful by Bioenergy Europe since a consensus was reached on the text and biomass was out of the scope of the ETD (interview Bioenergy Europe).

Other European Union bodies

However, the different interest groups also lobbied at the other bodies of the European Union. The lobbying efforts at the European Commission predominantly were already mentioned in the section on the administrative strategy. But the lobby directed at the European Parliament is for a considerable part executed through a parliamentary lobby strategy. The interest groups have the most success with their lobby directed at members of the European Parliament (MEPs) that are aligned with the group's interests and values. This means that the lines between especially the citizen groups and the green parties are close, for Transport & Environment it was easier to convey their ideas about the revision of the ETD to MEPs than to the Council, where ministers are often more industry leaning (interview T&E). And ClientEarth (interview) tried to influence MEPs to put pressure on the Commission to change the legal basis of the ETD. Because currently, the ETD has its legal basis from taxation, however, following the Green Deal, ClientEarth proposes to change the legal basis from the ETD to an environmental one. For this lobby, the Greens were also the most likely target.

In general, the business associations also perceive the European Parliament as more open and transparent than the Council, which helps in contacting MEPs. Through several meetings with different MEPs, they are able to identify which MEPs might be supportive of their interests. This is not necessarily limited to the green parties, but there is a substantial overlap of interests with the MEPs representing green parties and the renewable business associations. Supportive MEPs would then help to create awareness for the interests and put pressure on the Council. However, in general, the lobby from all interest groups was not that intensive at the European Parliament, since the approval of the ETD is not within the responsibilities of the European Parliament.

4.2.3 Media strategy

In contrast to the insider strategies (administrative and parliamentary), the interest groups also used outsider strategies in their lobbying for the Energy Taxation Directive. From the two outsider strategies, all the interest groups mostly employed the media strategy. However, they did not use the media strategy on the ETD as much as they would have normally, on other files. The ETD file did not attract much attention and therefore they chose to spend their (limited) budget elsewhere. The precise reasons for this will be further delineated in the answer to sub-question two. In the cases where the interest groups used the media strategy on the ETD, most of their focus was on (European) politics-oriented media. Four out of the six business associations mentioned reaching out to Politico and Euractiv, both (online) news platforms that cover EU policy. WindEurope (interview) also emphasized that they engaged with newspapers in different EU member states, for example in the Netherlands with het Financieel Dagblad, or with LeMonde in France. Their motive for engaging with these kinds of

media is that these are the newspapers that policymakers will typically read. The citizen group Transport & Environment (T&E) was also in contact with and quoted by Politico.

“And so we were quoted in the climate newsletter, which is quite a win for us because, you know, our ideas like are out there” (interview T&E). In an article from Politico, Jo Dardenne from Transport & Environment, for example mentioned, “One of the biggest challenges with the revision of the Energy Taxation Directive was to get rid of the unfair tax privileges that some sectors benefited from” (Gavin, 2024). And in addition to that they were contacted by Reuters to explain some of the details of the proposal for the revision of the ETD, so T&E clarified the numbers on exemptions, on fuel use and emissions of aviation, that were still considered in the ETD.

Another part of the media lobbying strategy is social media. For all the interest groups social media is an integral part of their lobbying work. AVERE (interview) mentioned that they always use social media, for example to promote their letters and consequently communicate their message with politicians. X, previously Twitter, is a common social media platform used by the organizations, for example ClientEarth (interview) has an account for DecarboniseNow and StopFossilFuelSubsidies. However, you need to be active on the platform to actually be visible. An alternative platform that became increasingly interesting to EREF is LinkedIn, initially they mainly used LinkedIn for personal applications, but now they “also see that, organizations use it to regularly post their positions and so on” (interview EREF). And EREF regards LinkedIn as an easier platform to promote their positions on a regular basis.

ClientEarth has been especially active on their website decarbonisenow.eu, where they have posted their statement and explained their motivations and objectives through reports and blogs (ClientEarth, n.d.). One way they use these blogs is to connect with other organizations, for example with the European Scientific Advisory Board on Climate Change.

A final application of media that WindEurope raises attention to is that they use it to react to political developments, with a formal response from the industry, so this is a method used by business associations. Their response will then be picked up by newspapers and people will know the position from the industry (interview WindEurope).

One aspect of the media strategy that is worth highlighting is that coalitions are quite common. In particular, the business associations have collaborated with each other, for example AVERE worked with charging infrastructure organizations to create a joint letter (interview AVERE). Although broader coalitions also exist between business associations and citizen groups to raise media awareness to their common sustainable objectives. The heightened coverage by media outlets facilitated the lobby efforts of interest groups directed toward politicians.

4.2.4 Mobilization strategy

The mobilization strategy is the type of lobbying strategy that was the least used by the researched interest groups on the revision of the Energy Taxation Directive. Only four out of the nine organizations mentioned some kind of instrument that can be defined under the mobilization strategy category. The business associations EREF (interview) and WindEurope (interview) either organized stakeholder meetings themselves or were present at one. They use these meetings to network and promote their

ideas and positions. WindEurope, for example, annually organizes a Global Wind Day, on this day there is a wind festival and businesses all over Europe open their windfarms to people.

A similar tool is used by ClientEarth (interview), who facilitated a webinar ahead of workshops from the European Commission. They invited stakeholders, journalists, as well as politicians to their webinar. To create public awareness of the event of the Commission and the ETD file, but also to share their own messages and positions on the ETD.

The European Environmental Bureau (interview EEB) did not employ any mobilization strategies themselves on the ETD, or on any file for that matter. However, they do sometimes help some of their members, consisting of smaller (national) NGOs with campaigns.

4.2.5 Conclusion of the lobbying strategies

Overall, similar lobbying strategies were used by both the business associations and the citizen groups. Both interest groups put the most emphasis on the administrative strategy in the first phase of their lobbying campaigns. And in the second phase, they primarily focused their lobby on the Council, with a parliamentary strategy. The business associations, also quite intensively lobbied at member states, through their national associations, in this phase. The focus in the lobbying campaigns on EU member states is underscored by an EU energy policy expert (interview expert), “So you really need to focus, as you rightfully said, on the member states”. The outsider lobbying strategies were not used that much by any interest group in their lobby on the Energy Taxation Directive. Although the media strategy was still an integral part of their campaign.

Additionally, in all the conducted interviews, it became apparent that the interest groups valued working together in coalitions during their lobbying campaign on the Energy Taxation Directive. There were coalitions with only business associations and only citizen groups, but also between the business associations and citizen groups. One of the most active coalitions on the ETD was the Electrification Alliance, this constitutes a more lasting coalition, which represents associations that posit that electrification is the future of the European Union’s energy system. The alliance is primarily constituted by business associations, but also a citizen group and a think-tank (Electrification Alliance, n.d.). From the researched interest groups, AVERE, SolarPower Europe, and Wind Europe are alliance members and have conducted part of their ETD lobbying campaigns through this alliance. The message from the Electrification Alliance was broader than the individual lobby points from the separate interest groups, but all the interest groups recognized the value of promoting electrification in the EU. AVERE (interview) utilized this collective effort in their parliamentary lobbying strategy aimed at the Council. And SolarPower Europe (interview) mentioned that they sent a joint letter with this coalition. EREF (interview) explained the advantage of working with coalitions, “another strategy is to work in coalitions because you can be much more effective. You have a much higher outreach”. The message is more convincing to politicians if not only the whole renewable energy sector is behind it, but is also supported by citizen groups. Even when there was no formal coalition between the interest groups, they still communicated regularly with each other to ascertain when they could collaborate.

4.3 Examining the lobbying strategies from interest groups on the Energy Taxation Directive

In this final section of the results, the four possible explanations for choosing lobbying strategies, positioned in the theoretical framework, will be examined. Thereby answering the second sub-question, *Why did an interest group use their particular lobbying strategies on the revision of the Energy Taxation Directive?*.

4.3.1 Group type

The specific type of interest group that is lobbying on the ETD could be the primary explanation for the lobbying strategy of the interest group. In this case, either the form of a business association or the form of a citizen group would cause the organization to adopt a particular strategy. While business associations are presumed to employ insider lobbying strategies, citizen groups are more likely to adopt outsider lobbying strategies. The influence that the group type had can be classified into three main aspects, the resources of a group, its membership composition, and its technical knowledge.

Resources

For the business associations, the resources were an important determinant for their lobbying campaign on the ETD. However, between the business associations, there seems to be a significant difference in the extent of their resources. Two business associations mentioned that they were limited in their ability to follow the file. EREF's limited staff resources necessitated them to strategically allocate their time, both in their insider as well as outsider lobbying (media) (interview EREF). Bioenergy Europe suffered the same staff impediments as EREF, but added the restrictions of their financial resources, for example, to afford monitoring tools (interview Bioenergy Europe). Whilst two others, Hydrogen Europe (interview) and WindEurope (interview) had enough staff capacity to follow the process for the revision of the ETD.

As for the citizen groups, resources also had a significant impact on their ability to lobby. A lack of resources instigated a decline in their reliance on media for their lobbying campaign on the Energy Taxation Directive. In particular, the lack of enough staff members meant they were not able to establish a media campaign on every file they were working on. Especially, the European Environmental Bureau (EEB) and Transport & Environment (T&E) opted to prioritize other files.

“Yes, we normally use the media. But it is as I said, there's only a limited capacity we have, I mean. We don't have the capacity to work on all files” (interview EEB).

The citizen group ClientEarth dedicated more resources to the ETD, with their commitment they created a website to raise awareness for the importance of improving the ETD to politicians. Although ClientEarth did as much as they could with their limited resources, the fact they were one of the only citizen groups prioritizing this file decreased their ability to lobby and their influence (interview ClientEarth).

In addition to the importance of resources for their own lobbying campaigns, all interest groups highlighted the disproportionately more resources in the hands of the fossil fuel industry. Some argued this increased their influence on the ETD (interview Bioenergy Europe).

Membership composition

A second aspect, that primarily impacted at which institutions the interest groups lobbied with a parliamentary strategy, was their membership composition. The business associations are all umbrella organizations at the European level, meaning that they are composed of national business associations, companies, and sometimes research centers, together they represent the whole value chain of their specific industry. The national associations from the European business associations helped them to lobby at member state level, either directly at national parliaments or to their permanent representatives in Brussels. With a successful lobby, they aimed to change the stance of the country in the Council. Additionally, these national associations provided them with an overview of what was going on in their country (interview AVERE). Which they could then use to support policymakers in the EU when they needed information from the ground (interview EREF).

Technical knowledge

The final aspect that was an important influence on the lobbying campaign of all the interest groups was their technical knowledge. All organizations possess extensive and in-depth knowledge of sustainability.

The business associations hold considerable knowledge of the particular renewable energy sector they are representing. Because they are very close to the companies and combine their own knowledge with that of their members (interview WindEurope). Furthermore, EREF mentions another advantage, “this is where EREF has a specific advantage because we have a very strong support from lawyers and legislation experts who help us then to table these specific legislation amendments” (interview EREF). For EREF the seniority of their staff is important to hold the technical knowledge in the organization, as well as to keep the close network they have with politicians. If they would lose someone from their staff, it would be hard to maintain the personal network this staff member had accumulated over time.

The citizen groups have more broad knowledge of the effects of environmental policies. For example in the case of the ETD, Transport & Environment analyzed what the percentage of total fuel use in aviation would be taxed in the new ETD, in order to measure the effectiveness of the ETD and to see how many revenues would be generated with such a taxation. “The added value for an organization like T&E is you know to be a think tank, so to provide or to create input to create calculations which have a value” (interview T&E).

Both types of interest groups use their technical knowledge for their lobby. In the administrative lobby strategy, it is more direct, to actually provide input into the proposal for the ETD. The European bureaucrats composing the directive are supportive of this input, as they are not always aware of all specificities and developments. “Especially in our sector, very rapidly moving towards innovation and the more the innovation, the more the industry sort of pivots to a different approach” (interview WindEurope). In the parliamentary strategy, the most important thing is making all decision-makers aware of the nuances in the legislative proposal, so that they take all things into consideration. Finally, T&E mentioned that their technical knowledge was also valued by the media. They were approached by the media because they were regarded as a trustworthy expert on the ETD (interview T&E).

4.3.2 Policy goal

A second potential explanation for the lobbying strategies of the interest groups on the ETD could be the policy goal itself. This explanation does not seem to have really impacted the strategies, but it did have an effect on the extent of attention to the file and most importantly on the pending agreement on the ETD.

The Energy Taxation Directive was mentioned to be quite a difficult file to understand both for the interest groups themselves and especially for the politicians. One of the difficulties is that energy taxation is very broad, “it’s more of a system wide issue” (interview WindEurope). Because the ETD has many technical aspects, the webinar that ClientEarth organized was mostly attended by political advisors and not by the actual decision makers (interview ClientEarth). In addition, the ETD file is very politically contentious. According to Hydrogen Europe (interview), this meant there was limited space for movement on the position in the Council, which decreased the extent of their lobby. The rigidity of the ETD is affirmed by the observation from Transport & Environment (interview), who ascribed the political contentiousness to the energy crisis, with politicians having to balance climate objectives with providing affordable energy. Which made the politicians more susceptible to the lobby from the fossil fuel industry to not change energy taxation.

Finally, the divided positions in both the European Parliament and the Council mean that the revision of the Energy Taxation Directive has still not been adopted. As a result of the difficulty in adopting a revised ETD, the European Environmental Bureau concentrated their lobbying efforts on other files (interview EEB).

4.3.3 Institutional character

The findings on the institutional character explanation are contrary to what was hypothesized. The prediction was that the institutional character could not explain the lobbying strategies of interest groups, due to the Energy Taxation Directive being a case of EU policy and all policies in the EU take place in the same institutional structure. The institutional character would therefore not change the lobbying strategies on the ETD vis-à-vis another EU policy. However, the fact that the final decision on the revision of the ETD is taken in the Council and needs unanimity significantly influenced the lobbying strategies of the researched interest groups.

The main consequence of the need for an unanimity decision in the Council is that all interest groups focused their lobby substantially more on the Council. Consequently, this also means that the European Parliament became a less important lobby target for the interest groups since the European Parliament did not have any formal power and could only act advisory. Both the lobbying at the Council and the European Parliament are regarded as a parliamentary strategy, however, they occur within different EU institutions.

“It’s a particularly difficult file because of course you need unanimity in the Council. It’s not an ordinary legislative procedure file, so the Parliament has a very limited role. Therefore, it was sort of limited what we could do with the rapporteur, with the MEPs. So of course you had to put more emphasis on the Council” (interview Hydrogen Europe).

These institutions have different levels of accessibility and transparency for interest groups. To reach the members of the Council, the interest groups had to use different channels, through member states or permanent representatives in the EU. Although all the interest groups perceived it as more difficult to reach the politicians in the Council, the business associations had a noteworthy advantage because of their national associations. Through their national associations, they had closer lines with national ministries, who in turn would decide in the Council via their ministers on the ETD. However, at the national level, there are often other interests at stake. “When it comes to taxation, national governments are quite protective of their prerogative” (interview WindEurope). National governments want to remain autonomous in their taxation policies, which makes it difficult to lobby for revising European taxation to become more harmonized and standardized across the EU. Furthermore, it is challenging to align the interests of every EU member state, for example, Hungary does not really have an EU-friendly government and is infamous for blocking important EU files (interview SolarPower Europe).

For citizen groups, their lobbying campaign became substantially more difficult because of unanimity decision-making in the Council. Citizen groups normally have quite some influence on the European Parliament, through MEPs. But, as mentioned, the EP is not involved as much in the ETD as in normal files. Therefore the lobbying opportunities for the citizen groups significantly decreased. Where the EP is perceived as quite transparent, the Council is not. In the EP there are many MEPs and political groups, which increases the opportunities for lobbying, although the citizen groups were most successful with their lobby directed at progressive and green MEPs or political parties. In the Council, it was difficult for the citizen groups to get access to the information, compared to the business associations who got their information from their connections in the national ministries. “But as a green NGO, we have much more power in the European Parliament” (interview T&E). ClientEarth argues that the Council is less open to NGOs because they do not feel accountable to civil society, they are in contrast to the EP not directly elected, so the ministers in the Council do not have any reason to listen to NGOs. ClientEarth also indicated that it was more difficult to arrange a meeting with permanent representatives of EU member states in Brussels, these politicians are not as used to meeting with NGOs as they are to meeting with business associations. And the citizen groups do not have the advantage of using national associations to reach the ministers in the Council (interview ClientEarth).

4.3.4 Public interest / sustainability issue

The final possible reason for the adoption of certain lobbying strategies by interest groups, positioned in this thesis, relates to considerations of public interest and sustainability issues. In the theoretical framework, it was argued that this could possibly explain lobbying strategies of interest groups that advocate for a public interest, in the case of the Energy Taxation Directive this public interest is promoting (European) sustainability. The prediction from this explanation is that interest groups who advocate a public interest would be more likely to use an outsider lobbying strategy, because of the societal benefits they aim to achieve. However, as discussed in the section on the media strategy and the mobilization strategy, outsider lobbying strategies were not used as much in the Energy Taxation Directive as this explanation would predict, especially regarding the mobilization strategy. And the other explanations seem to have impacted their choice whether to adopt outsider strategies more, particularly their lack of resources. The citizen groups would have preferred to use the media strategy but were limited by their staff resources.

Nevertheless, the public interest issue explanation has had a significant impact on the lobbying campaigns of the interest groups. It was noteworthy to observe that multiple types of public interests were mentioned to have been used by the interest groups, besides sustainability these were competitiveness and energy independence. The interest groups had to adapt their narrative strategically according to the people, place, and time they were lobbying.

Sustainability narrative

Worth emphasizing is that all researched interest groups underscore the importance of sustainable policies and therefore advocate for a revision of the Energy Taxation Directive promoting sustainability and incentivizing renewable energy. Their specific objectives have already been analyzed in the section answering the first sub-question. For all the interest groups sustainability objectives were the starting point to begin their lobbying on the ETD. This is not the case for a considerable number of other business associations, that represent either the fossil fuel industry or businesses and industries relying on fossil fuels.

For the researched business associations, sustainable objectives are a core part of their business. All the business associations represent an industry in the renewable energy transition. In that sense, they all use that narrative towards politicians, advocating that they provide the solution to Europe's energy transition. And EU policies should reflect this and further incentivize renewable energy investments. That is also why they were supportive of the proposal by the European Commission to look at the carbon intensity of energy in taxation (interview WindEurope).

In the case of the citizen groups, this primarily meant that they identified the ETD as a file where they could have an influence on the sustainable future of Europe. They saw the current ETD as undermining the EU's climate targets (interview EEB). As argued by ClientEarth (interview), the ETD should start from environmental objectives and be used as a tool to achieve climate change objectives, in accordance with the Green Deal. That is why ClientEarth's main lobby effort has focused on the Commission. They tried to influence the Commission to change the legal basis of the ETD away from taxation and to an environmental purpose. They did not succeed in convincing the Commission of this change. Another important sustainability argument used by the three citizen groups was the 'polluter pays principle'. This argument combines the sustainable outcomes of making polluting more expensive and skimming revenues from fossil fuel companies. The generated revenues from this could then be used to catalyze sustainable investments and help vulnerable households in the green transition.

However, other public interest narratives also played a role in the lobbying campaigns of the interest groups. Whereas in the first years after the Paris Agreement and the EU Green Deal the sustainability narrative was most prominent in the EU. After the COVID-19 pandemic and the war in Ukraine, two narratives became more important for EU politicians, competitiveness and energy independence.

Competitiveness narrative

The competitiveness narrative articulates that a strong European renewable energy sector can contribute to a competitive internal EU market. This was a narrative that EU politicians were susceptible to because of the economic struggles during and following the COVID-19 pandemic. Politicians were reluctant to raise taxes, which would increase citizen's energy bills, and therefore did not want to change the ETD tax scheme. The struggle for the researched interest groups was to convince the

politicians that revising the ETD to incentivize renewable energy would actually help lower citizens' energy bills and furthermore would boost the EU economy by creating jobs and fostering technological development.

“And so the challenge for renewables and other energy industries is rather to make the case that actually growing wind, for example in our case, actually fits within that agenda, it helps the competitiveness of the European economy, it creates jobs, it keeps energy prices low”. (interview WindEurope).

ClientEarth (interview) emphasized that for the internal market to work efficiently, a revised Energy Taxation Directive should get rid of the tax exemptions in the ETD and ensure even energy taxation across EU countries.

Energy independence narrative

The COVID-19 pandemic also disclosed the vulnerability of countries and the EU to rely on other countries and continents for the supply of vaccines and other medical equipment. And this was further highlighted after the war in Ukraine when Europe tried to phase out the Russian energy supply as quickly as possible. Especially the business associations used the narrative of EU energy independence and autonomy to emphasize the importance of revising the ETD to enhance the deployment of renewable energy sources and scale up electrification in the EU. Bioenergy Europe (interview), for example, argued that bioenergy is almost a completely European energy source since they produce 95% of their energy in Europe. The heating sector significantly is a sector where it will be feasible to become energy-independent and achieve decarbonization through the adoption of bioenergy. And Hydrogen Europe (interview) emphasized that more hydrogen energy would help diversify the EU's import stream. This narrative was more difficult to embrace for the citizen groups, as they do not represent the renewable energy sector. However, they still tried to use the narrative to frame sustainable objectives in the bigger picture, linking sustainability to economy, energy independence, and safety (interview EEB).

So, the public interest explanation was prominent in the lobbying campaigns of the interest groups in the ETD, through three different narratives, sustainability, competitiveness, and energy independence. However, these narratives did not necessarily affect their lobbying strategy. It was important for the interest groups to recognize that the importance of narratives were shifting in EU politics and they had to strategically adapt to this.

4.3.5 Conclusion of examination lobbying strategies

In this section, the four (possible) explanations for choosing lobbying strategies by business associations and citizen groups on the revision of the Energy Taxation Directive have been examined. Table 7 summarizes the effect an explanation had on the lobbying strategies. Where the factors in the explanation represent an intermediary factor that influenced part of the lobbying strategies from the interest groups.

Table 7.

Possible explanation for lobbying strategies

Possible explanation	Factors in the explanation	Effect on lobbying strategies
Group type	<ul style="list-style-type: none"> - Resources - Membership composition - Technical knowledge 	<ul style="list-style-type: none"> ➔ Lack of resources = less media strategy ➔ Business associations use national associations ➔ Interest groups use knowledge in administrative, parliamentary, and media strategy
Policy goal	<ul style="list-style-type: none"> - Difficult file - Politically contentious 	<ul style="list-style-type: none"> ➔ Less attention ➔ Difficult to lobby
Institutional character	<ul style="list-style-type: none"> - Unanimity 	<ul style="list-style-type: none"> ➔ Lobby focused more on the Council
Public interest / sustainability issue	<ul style="list-style-type: none"> - Shifting narrative 	<ul style="list-style-type: none"> ➔ Have to adapt lobbying campaign to shifting narrative

5. Conclusion and discussion

In the conclusion of this thesis the research question, *How does the issue of sustainability influence the lobbying strategies of citizen groups and business associations, with similar public interests, on the European Union's revision of the Energy Taxation Directive?*, will be answered. The answers to the two sub-questions provide the foundation for addressing the main research question. As well as inform the summary of the results, which is an examination of the other possible explanations for the lobbying strategies of the interest groups on the ETD. The input of an expert from the Jacques Delors Energy Center is incorporated for feedback on the findings.

5.1 The influence of sustainability on the lobbying strategies of interest groups on the Energy Taxation Directive

According to the public interest explanation, the issue of sustainability would affect the lobbying strategies of interest groups. The theory predicts that interest groups lobbying for a public interest would be more likely to use outsider lobbying strategies. However, the issue of sustainability, a public interest, did not significantly influence the lobbying strategies from both business associations and citizen groups on the revision of the Energy Taxation Directive. The media and mobilization strategy were not the dominant lobbying strategies used by the researched interest groups. However, sustainability concerns were an important narrative used by the interest groups in their lobbying campaigns. Over time, both types of interest groups, but mostly business associations, combined the narrative of sustainability with the narratives of competitiveness and energy independence. By combining these narratives, they tried to strategically adapt to the shifting priorities of EU politicians.

The expert positioned an advantage for the business association in the shifting of narratives, from a focus on sustainability to more focus on competitiveness. The competitiveness narrative is assumed to give more voice to the industry and business associations. The interlinkage between the narratives mentioned in the research, sustainability, competitiveness, and energy independence, comes back in the theory on the energy trilemma, where energy independence is formulated as security. The expert explained the essence of the energy trilemma, as: "you only can have two at the same time to be put forward, you know, and one is going to be left on the side" (interview Expert). In European politics, the one left out would now be sustainability, while before the war in Ukraine, security was not on the agenda.

In addition, the public interest and sustainability issue explanation could partially explain the active forming of coalitions on the ETD. Normally, business associations are not likely to collaborate with citizen groups. However, the collective recognition of the importance of combating climate change meant that for a considerable part they lobbied for similar objectives in the revision of the ETD.

5.2 Summary of the results

In contrast to the expectations based on the prevailing literature, the institutional character explanation had the most substantial impact on the lobbying strategies. The fact that the revision of the ETD needs to be approved with unanimity in the Council significantly influenced where the interest groups lobbied and to what extent. This makes the lobbying process on the ETD different from other files. Since the Council has the final decision, the interest groups primarily used a parliamentary lobbying strategy to lobby Council members, and indirectly influence the decision-making through member states. The business associations had an advantage in this process over citizen groups due to

their membership composition, which consists of associations at the national level. The expert agreed that unanimity had a major impact on lobbying on the ETD and that business associations would have an advantage in their lobbies at national parliaments. However, the variety between member states would not make this easy (interview Expert).

In the case of the Energy Taxation Directive, the group type of an interest group does for some part explain its lobbying strategies. This is highly related to the resources from the interest groups. According to the theory, citizen groups are less able to use an insider lobbying strategy due to their limited resources, compared to business associations. However, in the ETD a lack of resources had a bigger impact on the limited extent to which interest groups used the media strategy, an outsider lobbying strategy. And this extended beyond citizen groups, business associations with limited resources appeared to encounter similar constraints in using the media for their lobbying campaigns.

The final explanation that was positioned in the theoretical framework, the policy goal explanation, did not influence the lobbying strategies of the researched interest groups. However, the difficulty of the Energy Taxation Directive does to some extent explain why the file has not yet been adopted.

As mentioned in the previous section, the public interest explanation had more impact on the narratives used by interest groups and the forming of coalitions, than that it impacted the lobbying strategies from the interest groups.

Looking back and future outlook

After looking at the research problem the thesis started with, sustainability was not the determining factor in the lobbying strategies of interest groups, instead unanimity was an important factor. However, common sustainability concerns between certain business associations and citizen groups resulted in coalitions forming between the two groups. Coalitions built around sustainability concerns might become increasingly important in pushing EU politicians to keep working towards a climate-neutral Europe in 2050. One of the first challenges these coalitions face is the still-needed approval on a revision of the Energy Taxation Directive.

5.3 Theoretical implications

In terms of theoretical implications, this thesis has broadened the available research on lobbying strategies from interest groups and the explanations for adopting lobbying strategies, in particular, the lobbying campaigns from business associations and interest groups, with similar public interests, on the revision of the Energy Taxation Directive. There is no single explanation for why an interest group adopted either insider or outsider lobbying strategies. However, the research has underscored the importance of unanimity as a determining factor in both the extent of the lobbying campaigns and the European institution where it occurs. These findings might be wider applicable in similar policy files, especially in the European Union.

With the addition of public interests into the equation, both researched interest group types promote sustainability, the thesis uncovered coalition forming between the groups when this conferred additional value. Although coalitions between business associations and citizen groups may seem unlikely, this can be explained by Yandle's Baptists and bootleggers theory. This theory shows how opposing groups can come together in the regulatory process (Yandle, 1983). In a recent addition to his

theory, Bruce Yandle, together with Adam Smith, examined climate policies. In climate policies, the Baptists are environmental organizations and the bootleggers are businesses that provide renewable energy. Both groups will support similar regulations, that encourage the usage of renewable energy sources (Smith & Yandle, 2014).

The examination of public interests also uncovered a shifting narrative used by the interest groups to persuade politicians, from sustainable objectives to competitiveness and energy independence. A combination of these different public interests is not often found in the literature on lobbying strategies.

5.4 Practical implications

The practical implications of the research are that the results offer insight to interest groups, especially those with limited resources, on how they can benefit from forming coalitions. Business associations and citizen groups that traditionally might not collaborate can find common ground in shared objectives like sustainability. This not only amplifies their voice but also presents an united front that can be more persuasive to policymakers.

5.5 Limitations

Although the thesis has added to the literature and research on lobbying strategies, there are several aspects of the study that require more attention.

The first limitation is the choice for a single case study of the Energy Taxation Directive. This choice decreases the generalizability of the findings. It is possible that the research's conclusions will not apply to other contexts. Especially, the need for an unanimity decision in the Council proved to be a significant factor in the lobbying strategies of the researched interest groups. This factor will not exist in all other political files.

A second limitation comes from using qualitative research such as desk research and semi-structured interviews. Lobbying is a notoriously difficult subject to research due to constraints in access to information. Certain aspects of lobbying strategies might not have been well-documented, especially insider strategies are less visible. By using semi-structured interviews the thesis tried to circumvent this limitation, however interviews might introduce biases into the research. Interviewees' answers might be influenced by personal opinions, selective memories, or agendas of their own. Additionally, the limited number of interviews, especially with citizen groups, might not fully capture the diversity of perspectives within all relevant interest groups involved in the ETD.

And a third limitation is the theoretical starting point of the research, which is based on lobbying (strategies) literature. Although this served as a useful basis for the research and provided insightful explanations, it became apparent during the research that this literature might not be able to completely explain the lobbying process of the ETD.

5.6 Avenues for future research

Future academic research could address the limitations of the study and aim to improve the generalizability of the findings.

Firstly, future research could employ a comparative case study across different policy areas and institutional contexts. This thesis demonstrated how unanimity was a significant factor in the lobbying campaigns from the researched interest groups on the ETD. Therefore, future research could specifically investigate how institutional requirements, such as the need for unanimity, influence interest group strategies. For example, research could compare lobbying strategies on various policy issues beyond energy taxation. Or, it could examine how different institutional contexts, such as federal versus unitary systems, impact lobbying strategies. This could include comparisons between countries with different types of policy-making processes.

Secondly, to address the limitations regarding the utilization of interviews for research and the limited participant pool, future research could combine quantitative and qualitative research. Quantitative surveys and statistical analysis can mitigate biases from interviews. In combination with a wider participant pool for interviews, this would ensure broader representation and objectivity.

And finally, a suggestion for future research would be to combine lobbying (strategies) literature with regulation literature. This avenue for research was briefly explored in the conclusion of the study, by introducing the Baptists and bootleggers theory (Yandle, 1983). However, for a comprehensive research, this should be expanded upon and incorporated from the beginning of the research in the theoretical framework.

References

- AVERE. (2020). *Feedback from AVERE – The European Association for Electromobility*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive/F510171_en
- Beyers, J. (2004). Voice and access: Political practices of European interest associations. *European Union Politics*, 5(2), 211-240. Retrieved from <https://journals.sagepub.com/doi/epdf/10.1177/1465116504042442>
- Binderkrantz, A. (2005). Interest group strategies: Navigating between privileged access and strategies of pressure. *Political Studies*, 53(4), 694-715. Retrieved from <https://journals.sagepub.com/doi/10.1111/j.1467-9248.2005.00552.x>
- Binderkrantz, A., & Krøyer, S. (2012). Customizing strategy: Policy goals and interest group strategies. *Interest Groups & Advocacy*, 1(1), 694-715. Retrieved from <https://link.springer.com/article/10.1057/iga.2012.6#citeas>
- Bioenergy Europe. (2021). *Bioenergy Europe's feedback on the revision of the Energy Taxation Directive (Directive 2003/96/EC)*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-Europese-Green-Deal-herziening-van-de-energiebelastingrichtlijn/F2751815_nl
- Bryman, A. (2012). *Social Research Methods*. Oxford, United Kingdom: Oxford University Press.
- Carter, N., Bryant-Lukosius, D., DiCenso, A., Blythe, J., & Neville, A. J. (2014). The use of triangulation in qualitative research. *Oncol Nurs Forum*, 41(5), 545-547. Retrieved from <https://pubmed.ncbi.nlm.nih.gov/25158659/>
- ClientEarth. (2020). *ClientEarth's public consultation reply on the revision of the Energy Taxation Directive*. Retrieved from <https://www.clientearth.org/media/gvnhwxms/clientearth-response-to-public-consultation-on-the-energy-taxation-directive-october-2020.pdf>
- Dialer, D., & Richter, M. (2019). Lobbying in Europe: Professionals, politicians, and institutions under general suspicion? In D. Dialer & M. Richter (Eds.), *Lobbying in the European Union: Strategies, dynamics and trends* (pp 1-18). Cham, Switzerland: Springer.
- Dür, A., & Mateo, G. (2013). Gaining access or going public? Interest group strategies in five European countries. *European Journal of Political Research*, 52(5), 660-686. Retrieved from <https://ejpr-onlinelibrary-wiley-com.tilburguniversity.idm.oclc.org/doi/epdf/10.1111/1475-6765.12012>
- Electrification Alliance. (n.d.). Home. Retrieved from <https://electrification-alliance.eu/>
- European Commission. (n.d.). EU Green Deal – Revision of the Energy Taxation Directive. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive_en
- European Commission. (2021a). *Restructuring the Union framework for the taxation of energy products and electricity (recast)* (Proposal for a Council Directive). Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive_en
- European Commission. (2021b). Revision of the Energy Taxation Directive (ETD): Questions and Answers. Retrieved from https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_3662
- European Council. (n.d.-b). European Green Deal. Retrieved from <https://www.consilium.europa.eu/en/policies/green-deal/>
- European Union. (n.d.). How EU policy is decided. Retrieved from

- https://european-union.europa.eu/institutions-law-budget/law/how-eu-policy-decided_en
European Environmental Bureau. (2020). *EEB's reply on the public consultation on the Inception Impact Assessment on the revision of the Energy Taxation Directive 2003/96/EC*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive/F510360_en
- European Environmental Bureau. (n.d.). Climate and energy. Retrieved from <https://eeb.org/work-areas/climate-change/#:~:text=The%20EEB%20believes%20that%20the,by%2065%25%20compared%20to%201990>
- European Renewable Energy Federation. (2020). *Feedback from: European Renewable Energy Federation (EREF)*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive/F510296_en
- Gavin, G. (2024, April 24). EU countries dilute fuel tax hike as green anger mounts. *Politico*. Retrieved from <https://www.politico.eu/article/european-union-fuel-tax-energy-taxation-directive>
- Grant, W. (1978). *Insider groups, outsider groups, and interest group strategies in Britain* (Working paper No. 19). Retrieved from University of Warwick, Department of Politics.
- Hancock, A., & Bounds, A. (2024, February 9). The power of Europe's rebellious farmers. *The Financial Times*. Retrieved from <https://www.ft.com/content/c642343b-589e-4347-9a7f-ff04b83728ff>
- Hanegraaff, M., Beyers, J., & De Bruycker, I. (2016). Balancing inside and outside lobbying: The political strategies of lobbyists at global diplomatic conferences. *European Journal of Political Research*, 55, 568-588. Retrieved from https://ejpr.onlinelibrary.wiley.com/doi/epdf/10.1111/1475-6765.12145?saml_referrer
- Hydrogen Europe. (2021). *Hydrogen Europe position papers: Reforming carbon markets to enable a liquid, sustainable and affordable hydrogen market*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-Europese-Green-Deal-herziening-van-de-energiebelastingrichtlijn/F2752598_nl
- Influence Map. (n.d.). EU Energy Taxation Directive. Retrieved March 14, 2024, from <https://europe.influencemap.org/policy/EU-Energy-Taxation-Directive-432>
- Junk, W. M. (2016). Two logics of NGO advocacy: understanding inside and outside lobbying on the EU environmental policies. *Journal of European Public Policy*, 23(2), 236-254. Retrieved from <https://www.tandfonline.com/action/showCitFormats?doi=10.1080%2F13501763.2015.1041416>
- Klüver, H. (2013). *Lobbying in the European Union: Interest groups, lobbying, coalitions, and policy change*. Oxford, United Kingdom: Oxford University Press.
- Lacy-Nichols, J., Quinn, M., & Cullerton, K. (2023). Aiding empirical research on the commercial determinants of health: a scoping review of datasets and methods about lobbying. *Health Research Policy and Systems*, 21(56). Retrieved from <https://health-policy-systems.biomedcentral.com/articles/10.1186/s12961-023-01011-8#citeas>
- Mach, A., & Eichenberger, S. (2024). Interest groups. In P. Emmenegger, F. Fossati, S. Häusermann, Y. Papadopoulos, P. Sciarini, & A. Vatter (Eds), *The Oxford handbook of Swiss politics* (pp. 337-354). Oxford, United Kingdom: Oxford University Press.

- Maloney, W. A., Jordan, G., & McLaughlin, A. M. (1994). Interest groups and public policy: The insider/outsider model revisited. *Journal of Public Policy*, 14(1), 17-38. Retrieved from <https://www.jstor.org/stable/4007561>
- Messad, P. (2024, April 26). Energy taxation directive: No progress expected before EU elections. *Euractiv*. Retrieved from <https://www.euractiv.com/section/climate-environment/news/energy-taxation-directive-no-progress-expected-before-eu-elections/>
- Olson Jr., M. (1965). *The logic of collective action: Public goods and the theory of groups, with a new preface and a preface and appendix*. Cambridge, MA: Harvard University Press.
- Parry, I., & Vollebergh, H. (2017). Reforming the EU Energy Tax Directive: Assessing the options. In I. Parry, K. Pittel, & H. R. J. Vollebergh (Eds.), *Energy tax and regulatory policy in Europe: Reform priorities* (pp. 95-129). Cambridge, MA: The MIT Press.
- Poletti, A., De Bièvre, & Hanegraaff, M. (2016). WTO judicial politics and EU trade policy: Business associations as vessels of special interest? *The British Journal of Politics and International Relations*, 18(1), 196-215. Retrieved from <https://journals.sagepub.com/doi/epub/10.1111/1467-856X.12071>
- Rekosh, E. (2005). Who defines the public interest? *International Journal on Human Rights*, 2(2), 166-179. Retrieved from <https://sur.conectas.org/en/defines-public-interest/>
- Salisbury, R. H. (1984). Interest representation: The dominance of institutions. *The American Political Science Review*, 78(1), 64-76. Retrieved from <https://www.jstor.org/stable/1961249>
- Seawright, J., & Gerring, J. (2008). Case selection techniques in case study research: A menu of qualitative and quantitative options. *Political Research Quarterly*, 61(2), 294-308. Retrieved from <https://journals.sagepub.com/doi/10.1177/1065912907313077>
- Smart Energy Europe. (2023, March 29). *Joint Statement on the Energy Taxation Directive (ETD)*. Retrieved from <https://smarten.eu/joint-statement-on-the-energy-taxation-directive-etc/>
- SolarPower Europe. (n.d.). Our story: Leading the energy transition. Retrieved from <https://www.solarpowereurope.org/about/our-story>
- SolarPower Europe. (2021). *SolarPower Europe feedback on the proposal for a revised Energy Taxation Directive*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive/F2752549_en
- Smith, S. (2017). Carbon pricing and taxation: Overcoming obstacles to policy reform in the EU. . In I. Parry, K. Pittel, & H. R. J. Vollebergh (Eds.), *Energy tax and regulatory policy in Europe: Reform priorities* (pp. 303-337). Cambridge, MA: The MIT Press.
- Tanguay, G. A., Lanoie, P., & Moreau, J. (2004). Environmental policy, public interest and political market. *Public Choice*, 120, 1-27. Retrieved from <https://www.jstor.org/stable/30025827?seq=1>
- Transport & Environment. (2020). *The Energy Taxation Directive: T&E's feedback on the Inception Impact Assessment*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive/F510089_en
- Weiler, F., & Brändli, M. (2015). Inside versus outside lobbying: How the institutional framework shapes the lobbying behaviour of interest groups. *European Journal of Political Research*, 54(4), 745-766. Retrieved from <https://ejpr.onlinelibrary.wiley.com/doi/10.1111/1475-6765.12106>

- WindEurope. (2020). *WindEurope response to the European Consultation on the Revision of the Energy Taxation Directive*. Retrieved from https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12227-EU-Green-Deal-Revision-of-the-Energy-Taxation-Directive/F510285_en
- Yandle, B. (1983). Bootleggers and Baptists: The education of a regulatory economist. *Regulation*, 7(3), 12-16. Retrieved from <https://techliberation.com/wp-content/uploads/2010/12/v7n3-3.pdf>
- Yandle, B., & Smith, A. (2014). *Bootleggers and Baptists: How economic forces and moral persuasion interact to shape regulatory politics*. Cato Institute.

Appendix A: Topic list

Topic list for semi-structured interviews on lobbying strategies with citizen groups and business associations in the context of the Energy Taxation Directive proposed by the EU, informed by the literature.

1. Introduction and background
 - a. Purpose of interview
 - b. Overview of the interviewee's organization and its mission
2. Lobbying objectives
 - a. Primary objectives and goals of the organization concerning the Energy Taxation Directive
 - b. Alignment of objectives with the interests of members/stakeholders
3. Lobbying strategies
 - a. Lobbying strategies employed to influence the Energy Taxation Directive
 - b. Specific tactics or approaches more or less effective
 - c. How to tailor lobbying strategies to engage policymakers effectively
 - d. Differences in lobbying strategies on other topics

Factors for the chosen lobbying strategies

4. Resources and capacity
 - a. Resources for lobbying efforts (on the Energy Taxation Directive) and available knowledge
 - b. Influence of size and composition of the organization on lobbying capacity
5. Policy goal and institutional character
 - a. Influence of policy goal on lobbying strategies: broad or specific, or dividable
 - b. Influence of institutional character of the EU on lobbying strategies: direct democratic instruments (e.g. referenda)
6. Public interests / sustainability issue
 - a. Influence of public issue of sustainability on lobbying strategies
 - b. Social benefits obtained
7. Reflections and future outlook
 - a. Future of lobbying in the context of sustainability policies, particularly the Energy Taxation Directive
 - b. Lessons learned or insights from lobbying experiences
8. Conclusion

Appendix B: Axial codes

Axial codes from the theoretical framework

- Administrative strategy
- Parliamentary strategy
- Media strategy
- Mobilization strategy
- Group type
- Policy goal
- Institutional character
- Public interest / sustainability issue

Supplementary axial codes

- Coalition
- Competitiveness (narrative)
- Covid
- Create network
- Decision makers
- Democratic accountability
- Directed at member states
- Engage with fossil industry
- Engage with members
- Energy independence (narrative)
- Energy poverty
- ETD objective(s)
- Expectations ETD
- Financial benefits
- Fossil fuel (big company) resources
- Good network
- Importance of research
- Informal meetings
- Lack of resources
- Lessons learned
- Lobby process
- Lobby strategy fossil industry
- Meetings with Council
- Monitoring tools
- Organizational information
- Personal meetings
- Political media
- Position paper
- Private interests
- Public consultation
- Public pressure

- Resources
- Successful lobbying
- Sustainability criteria
- Talk with DGs
- Talk with MEPs
- Taxation issue
- Technical knowledge
- Unanimity