

Corporate and NGO lobbying

*The influence of stakeholders on European Commission's
Circular Economy Package*



By: Ferdinand Hoorweg
Student number: 1284045
Date: 10 January 2018
Master: Public Administration:
International and European Governance
Place: Faculty of Governance and Global Affairs,
Leiden University
Supervisor: Dr. Bert Fraussen



ABSTRACT

This study pursues to obtain comprehensive insights on the influence of stakeholders on European Commission's Circular Economy Package. We expect that group type, the level of resources (lobbying budget and the number of lobbyists in FTEs) and framing shape the influence of stakeholders. Here, we conceptualise stakeholders as interest organisations and influence as access to policy-makers. We therefore analyse meetings between interest organisations and the European Commission by consulting the Integritywatch database. This database extracts information from LobbyFacts and the Transparency Register, which provide us with information on stakeholders group type (NGO/corporate) and their resources. Additionally, we use information from semi-structured interviews with representatives of important stakeholders to elaborate on differences between NGO and corporate lobbying, their use of frames and the role of resources. The combination of quantitative data from the Integritywatch database and qualitative data from the interviews provide further insights on the role of resources as well as group type and framing with regard to the influence of interest organisations.

We find that corporate organisations are more influential than NGOs (group type) on the issue. It seems however, that they do have more diffuse interests on the topic, while NGOs seem to be more aligned and in favour of enhanced environmental policies. The transition towards a circular economy model is about system change and ultimately affects how business and industries are ought to operate, which is why corporate organisations rather have a smooth transition during which they can secure their interests. Hence, they find themselves in a more defensive lobbying position on the circular economy issue, contrary to NGOs. This could explain why corporate organisations outnumber NGOs here, referring to access to policy-makers. Also, we find that the level of resources does not account for the influence of stakeholders. According to the interviewees however, the quality of resources does seem to be of considerable importance. More specifically, the competences of the lobbyists. Lastly, we find that framing is indeed a integrated part of the lobbying process, while economic frames and public interests frames are used by both NGOs and corporate organisations on the issue. Furthermore, we find that frames are adjusted constantly, depending on the policy phase, audience and lobbying objectives.

TABLE OF CONTENTS

Chapter	Title	Page number
1	INTRODUCTION	7
1.1	Problem definition and research question	7
1.2	Social and academic relevance	8
1.3	Reader's guide (thesis structure)	9
1.4	Context: towards a circular economy	9
2	LITERATURE REVIEW AND THEORETICAL FRAMEWORK	11
2.1	Literature review on interest organisations' influence	11
2.1.1	Defining and measuring influence	11
2.1.2	The role of group type and resources	13
2.1.3	The role of framing	14
2.2	Defining the concepts	16
2.2.1	Defining influence	16
2.2.2	Defining group type, resources and framing	17
2.3	Conceptual model and expectations	19
3	RESEARCH DESIGN	23
3.1	Case selection	23
3.2	Research and data collection method	23
3.3	Operationalisation of key variables	26

4	ANALYSIS	31
4.1	Analytical strategy	31
4.2	Analysis	31
4.2.1	Group type: corporate organisations and NGOs	36
4.2.2	Resources	42
4.2.3	Framing	47
4.2.4	Influence of stakeholders	49
4.2.5	The policy-makers	51
4.3	Synthesis	58
4.3.1	The role of group type	59
4.3.2	The role of resources	60
4.3.3	The role of framing	61
4.3.4	Influence as access to policy-makers: Circular Economy Package	61
4.3.5	Differences between NGO and corporate lobbying	65
5	CONCLUSION AND DISCUSSION	68
5.1	Summary of the main findings	68
5.2	Limitations of the study	70
5.3	Recommendations for future research	73
	REFERENCES	75
	CONSULTED DATABASES	79
	APPENDICES (A, B, C and D)	80

LIST OF FIGURES AND TABLES

Number	Title	Page
Figure 1	Visualisation of a linear, reuse and circular economy	10
Figure 2	Abstract conceptual model	19
Figure 3	Extensive conceptual model	22
Table 1	Definition of concepts, indicators and operationalisation	28
Table 2	Distribution of respondents to the EC's open consultation on circular economy	32
Table 3	Overview on the number of active organisations and lobbyists that arranged meetings with Senior EC staff on the subject circular economy	33
Table 4	Distribution NGO/corporate in open consultation and with regard to meetings with EC	34
Figure 4	Distribution of organisations	35
Figure 5	Distribution of meetings according to hierarchy level	35
Table 5	Average number of lobbyists and average number of meetings per organisation	35
Figure 6	Top 10 lobby organisations with the most high-level meetings with the European Commission on the subject circular economy	36
Table 6	Number of meetings and lobbyists for NGOs and corporate organisations on the subject circular economy	39

Table 7	Average number of meetings and lobbyists per (NGO/corporate) organisation	39
Figure 7	10 most influential NGOs	40
Figure 8	10 most influential corporate organisations	40
Table 8	Top 10 most influential corporate organisations and their resources	45
Table 9	Top 10 most influential NGOs and their resources	46
Figure 9	Distribution of meetings with corporate organisations	52
Figure 10	Distribution of meetings with NGOs	52
Table 10	Distribution of meetings with EC senior staff members, according to hierarchy level	52
Figure 11	Top 10 hosts for corporate organisations	53
Figure 12	Top 10 hosts for corporate NGOs	53
Table 11	EC's most receptive senior staff member towards NGOs and corporate organisations on the subject circular economy.	54
Table 12	Distribution of contacts from the most receptive hosts	57
Table 13	Number of lobbyists involved in meetings between organisations and policy-makers, according to hierarchy level	63

1. INTRODUCTION

1.1 Problem definition and research question

The European Commission (EC) is the only institution that has legislative initiative, or the ‘right of initiative’, in the European Union. This means that only the EC can make formal proposals for legislation. The EC is also responsible for planning and preparing new legislation (Barnard, 2014: 45-46). In order to ensure better results and better quality of legislation, the EC set out the better regulation agenda that focusses on designing and evaluating EU laws and policies. It aims at making the decision-making process more transparent and reducing the democratic deficit (Tanasescu, 2009: 85-86). In doing so, the EC wants to ensure that citizens and stakeholders are able to contribute throughout the entire policy process, as well as that policies are evidence-based and that the administrative burden remains as low as possible (“Better regulation”, n.d.). Given the fact that the EC has the privilege to initiate legislations, the EC is and always has been the most important target for lobbying activities (Tanasescu, 2009: 55). From the perspective of the EC, these interactions with private interests are crucial to ensure input legitimacy for their decisions and to acquire specialist information (Broscheid 2003: 180). However, the ‘Communication from the President to the Commission’ (Juncker, 2014: 9) states that “Members of the Commission should seek to ensure an appropriate balance and representativeness in the stakeholders they meet”.

In the light of the above, it is interesting to research the influence of stakeholders on the rather new Circular Economy Package, which aims to “close the loop” and push the European Union from a linear economy towards a circular economy (Lazarevic, 2017). The Circular Economy Package consists of a Circular Economy Action Plan and multiple policy proposals regarding waste management, resource efficiency and land fill. Consequently, this Circular Economy Package challenges businesses as well as citizens, since this package provides an opportunity to reinvent our economy (“Circular Economy”, n.d.). This new economic model requires new business models, restoration and circularity of product components and a shift from consumer to user (Michelini, 2017; Lazarevic, 2017). The circular economy is therefore a salient issue for a broad spectrum of stakeholders, like corporate organisations, citizen groups or NGOs. Hence, the contents of the European Commission’s Circular Economy Package as well its implementation are highly relevant for a varied set of stakeholders. Additionally, it is important for the European Commission to meet with these stakeholders to ensure legitimacy and acquire

relevant information in order to set up a realistic, yet ambitious Package to effectuate a transition towards a circular economy.

This dissertation will elaborate on the question: “*What is the influence of stakeholders on European Commission’s Circular Economy Package?*” In scrutinising the question, this research aims at explaining what contributes to stakeholders’ influence on this Circular Economy Package and to provide additional insights regarding influence of corporate and NGO stakeholders on EU environmental policies. In this thesis, we will conceptualise influence as access to policy-makers. Building upon previous research, we scrutinise how three key factors shape interest group influence: resources, group type and framing. In the next paragraph, we will clarify the social and academic relevance of this research, introduce the structure of thesis and provide some more background on the policy initiatives of the EC related to the circular economy, as well as the concept itself.

1.2 Social and academic relevance

The social relevance here is that it is that a transition is to be made towards a circular economy in order to sustain ourselves properly in the future. Our current economic model will not hold due to growing population, increased demand for food, inefficient use of resources and environmental impacts (Jurgilevich, 2016). In order to overcome the problems surrounding our current production and consumption models, based on continuous growth and increasing resource throughput, the concept of a circular economy has received worldwide attention (Ghisellini, 2016). The transition towards this new economic model will affect the way we live our lives, our behaviour and how business operate (Lazarevic, 2017). Policies that aim to put this transition into motion, like those in the Circular Economy Package, have a notable social impact. The contents of these policies, how these policies are shaped and by whom they are influenced are therefore considerably socially relevant.

The latter is also scientifically relevant. After all, influence is considered the holy grail among interest group studies (Leech, 2010: 534). The INTEREURO project already made significant contributions to literature regarding interest groups’ influence on EU policies (INTEREURO, n.d.). Researching the influence of stakeholders on the European Commission’s Circular Economy Package can contribute to existing research on the influence of interest organisations on European public policies (Dür, 2008a; Dür, 2015; Klüver, 2012). Also, it can provide further insights on what contributes to the influence of stakeholders on public policies (Klüver, 2012; Michalowitz, 2007), by researching how group type, resources and framing contribute to the

influence of interest organisations. Hence we make a distinction between corporate organisations and NGOs, since they differ in nature. In doing so, we can gain further insights on differences between corporate lobbying and NGO lobbying (Dür, 2015). Furthermore, we can gain insights on how resources account for the influence of both of these group types and how they differ in employing frames (Chalmers, 2011; Eising, 2007; Klüver, 2015a; De Bruycker, 2017). The role of these factors have not been tested often in a new policy domains, like the circular economy's. The salience of the issue as well as the considerable urgency of a transition towards a circular economy naturally ask for effective policies. Since these new policies set the tone for future policies on the issue, it is perhaps even more important to have a proper balance between public interests (NGOs) and private interests (corporate organisations) when developing these policies.

1.3 Reader's guide

This dissertation will first carry out a literature review, in which we will identify relevant literatures related to the research question and the broader topic of influence of interest groups on public policies. We will summarise this literature, review its methods and findings, and ultimately clarify how this dissertation contributes to existing knowledge on how stakeholders influence public policies. Then, we will provide a theoretical framework and conceptual model in which we outline our expectations, which will be tested in the analysis. In this research design section, we will justify the methodology and the employed unit of analysis and operationalise the main theoretical concepts. Consequently, we provide an analysis in which we discuss the results of our research in detail. In the conclusion we formulate a coherent answer to the research question, discuss the limitations of our analysis, reflect on the reliability and validity of our research and put forward recommendations for future research, flowing from our findings.

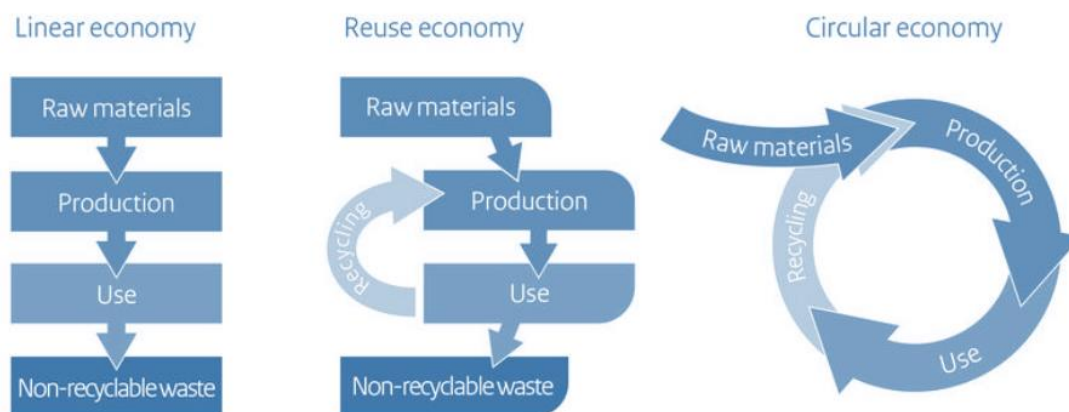
1.4 Context: towards a circular economy

Since "circular economy" is a rather new concept, it is important to provide some more context in this introduction. The world's population keeps on growing, while in some parts of the world water and food becomes increasingly scarce. Many water systems, on which ecosystems thrive, have become stressed. More than half of the world's wetlands have disappeared and rivers and lakes are drying up or have become too polluted to use. Due to climate change, weather patterns are altering and therefore cause shortages, droughts or floods all around the world. At our current consumption rate, a large part of the world's population

may face shortage of water, food and resources (Jurgilevich, 2016; Rockström, 2012; Healey, 2011; “Water scarcity”, n.d.).

In order to tackle the pressing issue of climate change and to secure the resources that planet earth provides us with, we need to fundamentally revise our economic model. The economy as we know it has been ‘linear’ as long as we can remember. It is based on the principle of ‘take-make-dispose’: raw materials are used to make a product and after its usage, the waste (for example the packaging) is thrown away. In the last two decades, we partly moved on to a reuse economy model, which adds the known concept of recycling. However, in order to sustain ourselves on this planet we need to shift towards a circular economy. This concept is based on preventing waste by making products and materials more efficiently and reusing them or turn them into raw materials again. In case new raw materials are needed, it is due to obtain them in a sustainable way, so that the environment is not damaged (“From a linear to a circular economy”, n.d.).

Figure 1: Visualisation of a linear, reuse and circular economy



Source: government.nl

“Circular economy offers opportunities to reinvent the economy and making it more sustainable and competitive. Therefore, it will bring benefits to (European) businesses, industries and citizens” (“Circular Economy”, n.d.). The European Commission has developed new policy initiatives that evolve around this rather new concept. The Commission adopted the Circular Economy Package at the end of 2015. From that moment on the Commission further shaped this policy area by launching stakeholder platforms and new key initiatives (“Circular Economy”, n.d.). Specifically, the Circular Economy Package consists of an Action Plan and directives on waste, packaging waste, electronic waste and landfill.

2. LITERATURE REVIEW AND THEORETICAL FRAMEWORK

2.1 Literature on interest organisations' influence and lobbying success

The broader topic here is the influence of interest groups on public policies. We will therefore first identify and discuss the existing literature on the topic. We reflect on how influence is defined and measured in the literature and evaluate its findings. Furthermore, we discuss studies regarding business lobbying, NGO lobbying and clarify factors that are assumed to account for lobbying success. We then review the literature regarding the role of framing in interest groups' lobbying strategies. After this literature review, we define the main concepts use in this dissertation and develop a conceptual model that specifies our main theoretical expectations.

2.1.1 Defining and measuring influence

Greenwood (2007: 12) concludes that, since the 1980s, the number of active interest groups increased strongly. Since the main goal of interest groups is to influence public policies, it is relevant to know how successful these interest groups are in employing their lobbying activities. Neofunctionalism as well as liberal intergovernmentalism, the major theories on European integration, both lay down a big role for interest groups (Grosman, 2004). Yet it seems that the topic of interest groups' influence in the EU has not yet received the attention it deserves. However, scholars such as Dür (2008a, 2008b), Chalmers (2011) and Klüver (2012, 2015a; 2015b) try to get a grip on the concept of interest groups' influence. Also Biliouri (1999) describes this concept in the light of the power of NGO lobbying in the EU. On the other hand, Woll (2007) does the same thing for business lobbying, followed by Rasmussen (2014). Reviewing these scholars' findings, among others, can provide insights on the central concept of this research: 'influence'. Furthermore, by discussing these literatures we can elaborate on possible mechanisms related to interest groups' influence.

“Influence can be considered the ‘holy grail’ among the interest group studies” (Leech, 2010: 534). However, there is no agreed upon definition of influence. Michalowitz's article (2007) evaluates US and European research regarding influence and its definition. She derives her definition of influence from Weber's (1980) definition of power, considering influence a weaker form of power (Michalowitz, 2007: 134). Her definition comes down to influence being the ability to persuade actors to follow a certain course of action, even if they intended not to do so initially. This corresponds with a common definition of influence, namely “the actor's ability to shape a decision in line with her preferences, or a causal relation between the

preferences of an actor regarding an outcome and the outcome itself” (Nagel, 1975: 29). This entails the ability of a lobbyist to change the mind of a decision maker, in line with his own objectives. However, this does not capture all the aspects of influence, since lobbyists are able to influence decision-makers via different channels (Dür, 2008a). Also, counteractive lobbying activities makes measuring the influence of interest groups rather difficult (Austen-Smith, 1994). Lastly, interest groups are able to exercise influence throughout the entire policy process. These factors makes the definition of influence and its measurement challenging.

Chalmers (2011: 471) defines interest groups’ influence as the “ability to efficiently process and provide relevant information”. Information can be considered the currency of lobbying the European Union. He (Chalmers, 2011: 471-472) also states that in the process of influencing policies, interest groups tend to lobby friends rather than foes, since they support like-minded decision makers rather than changing the minds of those that do not (Berry, 1977). More specifically, it is the interest groups’ service of providing relevant information to policy-makers that holds the key to having legitimate access to the policy-making process (Austen-Smith, 1993: 799-800). Chalmers’s article (2011) complies with the idea of ‘information = power’ or in this case ‘information = influence’. He is able to confirm his hypothesis, which means “the more efficient interest groups are at information processing, the more influence they will have” (Chalmers, 2011: 473). Furthermore, Bouwen (2002: 369-370) states that providing expert knowledge by private actors is considered an access good, enabling access to EU institutions and the policy making process. Providing relevant information is, in the eyes of a policy maker, the added value of lobbyists (Broscheid, 2003: 167). Consequently, providing information is considered important (Bouwen, 2002) or even crucial (Eising, 2007) for obtaining access. All things considered, interest groups or organisations can exercise influence once they gain access to the policy making process and more specifically, the policy-makers. Access can therefore me seen as an indicator for the actual influence of interest groups on the policy-making process.

Determining the power and influence of interest groups on public policies is rather difficult to measure empirically. Woll (2007) discusses the difficulties regarding the operationalisation and reflects on conceptual confusion and ambiguity when it comes to measuring influence and power. Woll (2007: 74) conducts a qualitative study, in which she applies Korpi’s power resource approach to business-government relations in order to analyse the type of relationship businesses and government officials have. By using process-tracing, she connects policy preferences and policy outcomes in order to determine ‘winners’ and ‘losers’ in business lobbying. She concludes that that perceived lobbying success depends on how receptive

governments are to demands, which in turn depends on their strategic advantages in international negotiations (Woll, 2007: 67-70). She states that studies on lobbying are always connected to the question of influence. However, “these studies have to be carried out in a context-specific way in order to help our understanding about a particular policy development” (Woll, 2007: 74). Hence, this dissertation will be carried out in a context-specific way: the context of the Circular Economy Package.

2.1.2 The role of group type and resources

Rasmussen (2014) also contributes to the topic of influence of interest organisations. The article also shows that “influence is a conditional concept that needs to be studied in its institutional and issue-specific context” (Rasmussen, 2014: 16). This corresponds with Woll’s (2007) conclusion. Although the research focusses on business lobbying in the European Parliament (EP), its findings are also useful to understand lobbying at other institutions, such as the EC. Rasmussen (2014:1) uses a comparative qualitative case study design of four legislative dossiers. In doing so, she draws on process-tracing – just like Woll (2007) – of EU documents and lobbying letters. The study examines the factors or conditions under which business lobbying is successful in shaping policy outcomes. The most notable factors here are business unity and low issue salience (Rasmussen, 2014: 1). However, business is often divided and tends to fight itself and not labour unions or NGOs. The study finds that business groups, if standing united, are more likely to be influential on product standards rather than process standards.

Moreover, the constant fine-tuning of EU legislation, most commonly via Commission proposals, means that interest groups can only marginally change legislation. Consequently, winners and losers are constantly made in EU lobbying, the article concludes (Rasmussen, 2014: 16). Following up on winners and losers in EU lobbying, Klüver (2012) studies what makes an interest group a winner or loser. In other words, Klüver (2012) examines what makes lobbying successful. The article finds that information supply, economic power and citizen support positively affect the ability of interest groups to lobby the EC successfully. She therefore concludes that “lobbying can be conceptualised as an exchange relationship of interdependent actors” (Klüver, 2012: 73). Furthermore, she notes that what matters here, is “the sum of the characteristics of all lobbying camp members rather than the properties of a few powerful interest groups” (Klüver, 2012: 73). The large-N analysis allows for generalisation of these findings and is therefore an important contribution to the literature regarding interest groups’ influence and lobbying success.

Following up on Klüver (2012), Dür (2015) also raises the question of what makes lobbying successful in the context of the policy-making process. He argues that “business groups frequently lose compared to the status quo and at best manages to limit the size of the losses” (Dür, 2015: 952). New regulation is often opposed by corporate organisations, since changing the status quo, in the form of market regulations, is usually not beneficial for business. This pushes corporate organisations in a defensive lobbying position. NGOs or citizen groups, on the other hand, tend to support new regulation more frequently (Dür, 2015: 952). New legislative proposals, such as the legislation in the Circular Economy Package, create opportunities for changing the status quo, usually beneficial for NGOs and citizen groups. Therefore, NGOs tend to hold an offensive lobbying position, which means that they do not defend the status quo, but rather push for changing the status quo. “The European Commission actively seeks policy areas in which it can propose legislation, regardless its limited scope of manoeuvre, since it wants to remain an active player in the legislative politics” (Dür, 2015: 956-958). In order to increase the likelihood of adopting legislation, the EC often seeks societal support via citizen groups. Consequently, it seems that NGOs or citizen groups hold an advantageous position in lobbying the EC. However, business groups tend to have more economic power, which positively affects lobbying success (Klüver, 2012).

In addition, it is also argued that interest groups with wealthy equipped resources find it easier to be successful in achieving their lobbying objectives (Klüver, 2011: 484). Eising (2007: 352) finds that resources are crucial to the explanation of access patterns. In addition to Klüver’s (2012) findings about the importance of economic weight or power, Eising (2007: 352-353) specifies that greater economic weight increases the contact frequency. Also, he emphasises that financial resources of interest groups are important determinant for access to the EC. These findings provide a basis for the development of our expectations with regard to determining the influence of stakeholders on the Circular Economy Package.

2.1.3 The role of framing

Furthermore, an increasing number of interest group studies address the concept of framing, and how interest groups employ framing in order to influence the policy-making process. De Bruycker’s (2016) article gives an overview of scholar’s work on interest group framing, highlighting key issues that scholar’s might face when researching framing. Assuming that lobbyists are framers (Baumgartner, 2007: 486) and thus use framing to influence policies, it is an interesting topic for interest groups studies. Nevertheless, there is no clear consensus on how

framing should be studied (Dewulf, 2009: 156). A definition of framing, however, that is broadly accepted across studies is introduced by Entman (1993: 52): “to frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the item described”. A lobbyist provides relevant information to policy-makers, but at the same time represents the interests of a group or organisation. Employing frames is therefore an essential part of the lobbying process.

De Bruycker (2016: 780-781) argues that frames are either endogenous or exogenous to influence, since they are external factors affecting influence or serve as means to define influence. In his article, De Bruycker (2016: 777-779) distinguishes frames into issue-specific and generic frames. Issue-specific frames are linked to the specific nature of the issue. They are suited for cases studies, but their use is limited when studying framing across different policy domains. Contrary, generic frames can be used across different policy areas and are therefore used in large-N studies. Examples of generic frames are an economic frame versus a public (interest) frame (Klüver, 2015a; Klüver, 2015b). The latter involves frames relating to environment, human rights or consumer rights. An alternate distinction is made between equivalence and emphasis frames. Equivalence frames are also generic frames, in which similar information is presented in a different way. These are applicable for studies across different policy issues. Moreover, emphasis frames regard emphasising one aspect of a certain issue over others (Druckman, 2004). Equivalence frames is thus about how information is presented, while emphasis frame is about the focussing on specific aspects of an issue.

However, these frames are often endogenous, being rather a reflection of interests than a specific part of a lobbying strategy. It is therefore hard to disentangle the frame’s actual effect from other factors (De Bruycker, 2016: 777-779). Also, frame choice can vary across interest groups as well as group type (Klüver’s, 2015b). By interviewing representatives of NGOs as well as corporate organisations, we attempt to unveil how they employed frames in the process of influencing the Circular Economy Package. Since the circular economy issue is scattered across different policy areas, it is interesting to analyse how generic (and equivalence) frames are used. More specifically, we can analyse how corporate organisations and NGOs use economic and/or public interest frames and how (or if) the use of framing relates to group type. We can also elaborate on which aspects the organisations emphasises (emphasis frames) when employing frames. All things considered, we assume that framing is inherent to the lobbying process and can contribute to influence. The in-depth information, extracted from the interview,

will hopefully provide further insights in the employment of framing by interest organisations and how it fits in the process of exerting influence on circular economy policies.

2.2 Defining the concepts

In this section, we will define the main concepts of this dissertation theoretically and provide a summary of the conceptual model that will be tested in the empirical analysis. We first clarify how we define ‘stakeholders’ followed by what we mean when we talk about the ‘Circular Economy Package’. Then, we elaborate on the concepts ‘influence’, ‘resources’, ‘group type’ and ‘framing’, since these are the main concepts in our research.

With respect to the research question, we consider ‘stakeholders’ to be interest organisations that employed lobbying activities surrounding European Commission’s circular economy policies. For this dissertation, we will make a distinction between corporate organisations and non-governmental organisations (NGOs), in order to reflect on possible differences with regard to their influence on the Circular Economy Package. Furthermore, the ‘European Commission’s Circular Economy Package’ is defined as all proposed directives (policies) as well as the proposed Action Plan by the European Commission on circular economy.

It is rather difficult to formulate a comprehensive answer on the research question, since influence is a rather abstract concept. Nevertheless, what we assume to account for influence is yet to be conceptualised. Therefore, we have to narrow down and define the concepts in order to disclose possible relations between these variables.

2.2.1 Defining influence

As Woll (2007: 74) already stated, studies on lobbying, like this one, are always connected to the question of influence. However, how to define the concept of influence is broadly debated. The scope of the definitions on influence, discussed in the literature review, is too large for this dissertation. Also, using the definition of influence being the ability to change the initial mindset of actors is contradictive, since interest groups tend to lobby friends rather than foes in pursuing their objectives (Chalmers, 2011: 471-472). By processing and providing relevant information to policy-makers, interest groups gain access to policy-makers and therefore can exert influence (Chalmers, 2011; Bouwen, 2002). This holds the assumption that interest groups can exert influence, provided they have access to the policy process, and more specifically, to the policy-makers. After all, access to policy-makers can be used to advance an organisation’s own interests (Intereuro, n.d.).

The European Commission needs to acquire specialist information in order to ensure input legitimacy (Broscheid 2003: 180). Also, interest groups' influence can be defined as the "ability to efficiently process and provide relevant information" (Chalmers, 2011: 471). Therefore, we conceptualise influence as the access to policy-makers within the European Commission. Specifically, we focus on access to European Commission's senior staff members. This entails Commissioners, Vice-Presidents, Director-Generals (DGs) and cabinet members that are to some extent responsible for shaping circular economy policies. We focus our research on access to these staff members, because we assume that they have a considerable say in the developing (circular economy) policies, since they hold a senior position in the European Commission.

We thus conceptualise influence as access to European Commission's policy-makers. More specifically, the European Commission's senior staff members. Consequently, we can clarify to whom the interest organisations have had the most access to, which portfolios they hold and to what extent these members of the European Commission succeed in ensuring "appropriate balance and representativeness in the stakeholders they meet" (Juncker, 2014: 9). In doing so, we can provide a comprehensive overview on stakeholders' influence on circular economy policies; the Circular Economy Package.

2.2.2 Defining group type, resources and framing

Since we now conceptualised the dependent variable, influence, we can conceptualise the independent variables. The independent variables we want to conceptualise are 'group type', 'resources' and 'framing'. We conceptualise group type as the nature of the interest group, being corporate or non-governmental. More specifically, it concerns the difference between an organisation that pursues profits and economic power (corporate) and an organisation that does not pursue profits and is also non-governmental (NGOs). Consequently, we make a distinction between non-governmental interest organisations and corporate interest organisations in this dissertation. In doing so we distinguish commercial/economic interests (corporate) from public interests (NGO). Also, we can link the findings of our research to existing literature that also assess the role of group type. Based on Klüver's (2012) conclusions, citizen support and economic power positively affect the ability of interest groups to lobby the EC successfully. We assume that businesses have a certain degree of economic power. Corporate lobby therefore holds economic power as a means to influence the policy making process. Moreover, we assume that citizen support is embedded in NGOs. Consequently, NGOs can use this to influence the policy making process. Hence, we can connect Klüver's findings about the positive effect of

economic power and citizen support to ‘group type’, the first independent variable. Our findings can then provide further insights into Klüver’s (2012) findings, in the context of the Circular Economy Package. We will elaborate on this in more detail in our expectations below.

Moreover, we conceptualise interest groups’ resources by the organisations’ lobbying budget and the number lobbyists (FTEs) they have at their disposal. Without resources in the form of FTEs and lobby budgets, it is highly unlikely that organisations are able to influence policies according to their interest. Lobbying is a billion-euro industry in Brussels with an estimated 30.000 lobbyists (Traynor, 2014). This was the estimate more than three years ago, so it is likely that these numbers have increased. Given the fact that organisations set up offices in Brussels, employ lobbyists and reserve budgets for lobbying activities, it seems that in order to have a say in EU policy-making, organisations have to deploy means in the form of resources. Hence, the observable resources of an organisation are to be found in the Transparency Register. We therefore conceptualise resources as the number of FTEs as well as the lobbying budget an organisation has at its disposal. We assume that resources contributes to the influence of interest groups (Eising, 2007).

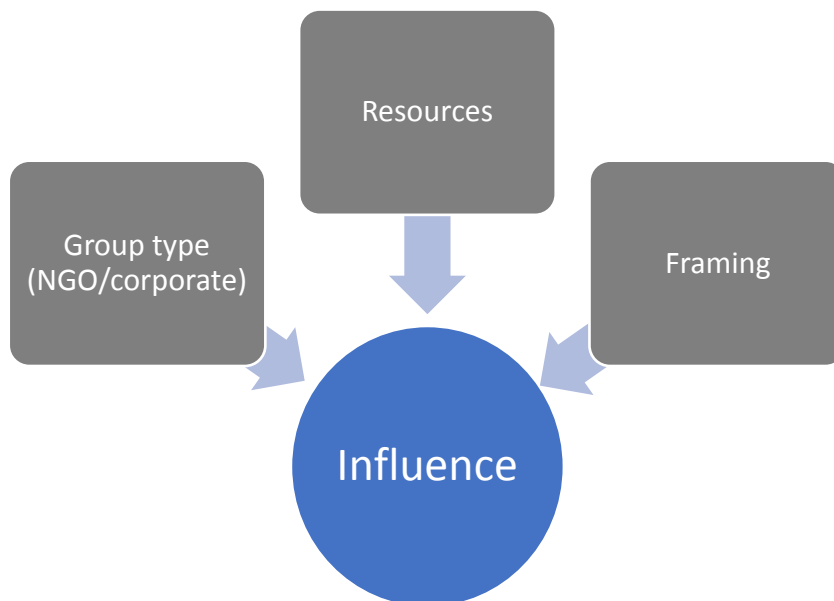
Furthermore, we conceptualise framing as part of a conscious strategy in which some aspects on a topic are made more salient, while others are ignored, with the goal of shaping policies to the favour of the organisation. Framing is often a key part of lobbying strategies (Baumgartner, 2007: 486). However, it is challenging to study this concept on a large scale and even more challenging to link the role of framing to interest groups’ influence or explain to what extent it contributes to pursuing lobbying objectives. De Bruycker (2016) set out some recommendations with regard to undertaking research on framing. However, this dissertation’s time frame does not allow to conduct large scale text analysis or dozens of interviews. Hence, it is not achievable to conduct a research that involves the contribution of framing to influence for all the interest organisations that pursued to influence the Circular Economy Package. However, since we are interested in framing, we conduct interviews with representatives of two important stakeholders – one corporate organisation and one NGO – in order to gain insights on the importance of framing and how it contributes to influencing the European Commission. In-depth information about framing from both a corporate as well as a non-governmental stakeholder will hopefully provide further insights on how framing is employed, how it fits in the lobbying strategy and ultimately, how it contributes to influencing policy-makers. We will test if corporate organisations tend to use economic frames, while NGOs tend to use public (interest) frames. In doing so we can also reflect on Klüver’s (2015b) findings. However, it is

rather difficult to generalise these insights on framing to all the active corporate and NGO stakeholders in the Circular Economy Package. Nonetheless, we fit in our findings from the conducted interviews into the analysis on the influence of stakeholders on the EC's Circular Economy Package.

2.3 Conceptual model and expectations

Based on our defined concepts, we provide a visual representation of the theoretical constructs and variables of interest. In the conceptual model we display the independent variables and the dependent variable. The arrows represent the expected effect that these variables have on the dependent variable. We explain the conceptual model by elaborating on our expectations, providing theoretical substantiation, based on the insights from the literature review and our definition of concepts. The abstract version of our conceptual model is displayed in figure 2.

Figure 2: Abstract conceptual model



In the conceptual model, as displayed above, the grey frames represent the independent variables, while the blue frame stands for the dependent variable. Consequently, the arrows show that these independent variables, being group type, resources and framing, are expected to account for the dependent variable: influence. More specifically, the influence of lobbying stakeholders on the Circular Economy Package. We will discuss this conceptual model extensively by articulating our theoretical expectations.

The first independent variable is group type. We conceptualised group type according to the nature of the organisation being corporate or non-governmental. Hence, we narrow down our scope of the analysis to these two different interest organisations and scrutinise how or if group type accounts for influence. We know that the main objectives of corporate organisations are realising profits and expending their economic power. Contrary, NGOs are not-for-profit or non-profit organisations and mostly pursue to affect change in line with their objectives. Most of the time, these objectives lie within the areas of environment, human rights and social equality among others. Hence, NGOs are citizen-based associations that are, in nature, not commercial but rather serve social or political purposes (Werker, 2008: 75-76; Folger, n.d.). Following up on this information and the findings of Klüver (2012), we can construct coherent theoretical expectations with regard to the effect of group type on influence.

Klüver (2012) finds that economic power, as well as citizen support, positively affects the ability of interest groups to lobby the European Commission successfully. Hence, we can use these findings for our research in order to gain insights on how corporate economic power accounts for influence, as well as NGO's citizen support. Corporate organisations hold a certain degree of economic power and pursue to gain even more, as well as profits. We therefore assume that economic power is embedded in corporate organisations and that they will use this as a means to influence policy-makers. Moreover, NGOs tend to have a certain degree of citizen support and represent certain public interests. We therefore assume that NGOs rely on citizen support and use this as a means to influence European Commission's policy-makers. After all, the European Commission needs citizen support in order to legitimise and gain support for their decisions. Citizen support can therefore also be effective when exerting influence on European Commission's policies. On the other hand, the EC pursues economic growth and prosperity in the EU (as a consequence of their policies). It is interesting to analyse how the EC balances citizen support (NGOs) against economic power (corporate organisations) in the process of developing circular economy policies. Hence, we can use Klüver's (2012) findings to provide more context on our research variable 'group type' and how this accounts for influence. By linking economic power to corporate organisations and citizen support to NGOs, we can elaborate on possible underlying mechanisms as well as differences between NGO and corporate lobbying on circular economy policies.

All things considered, we expect that corporate organisations are able to exert more influence than NGOs. We theorise that economic power is a better means to influence policy-makers, especially when it concerns a topic like circular economy. In order to 'sell' the circular economy

policies to the public as well as their peers, policy-makers have to show the economic benefits of a transition towards a circular economy in terms of job creation and economic growth. A transition towards a circular economy sometimes asks for a reinvention of entire business models, costing businesses a lot of money. This could ultimately lead to a loss of jobs and economic growth. In order to effectuate a smooth transition, policies therefore have to take corporate organisation's economic power into account. Since the European Commission's top priorities are job creation, economic growth and investments (European Voice, 2014), it is safe to assume that EC policy-makers highly appreciate these objectives. Consequently, it is more likely that corporate organisations are able to exert more influence than NGOs, since the role of economic power is important in pursuing the institution's (the EC) own objectives. Although citizen support is also important for the support of legislation, NGOs cannot contribute to economic growth and job creation in a way that corporate organisations can. We therefore theorise that, despite the urgency of the transition towards a circular economy, corporate organisations are able to exert more influence on circular economy policies than NGOs.

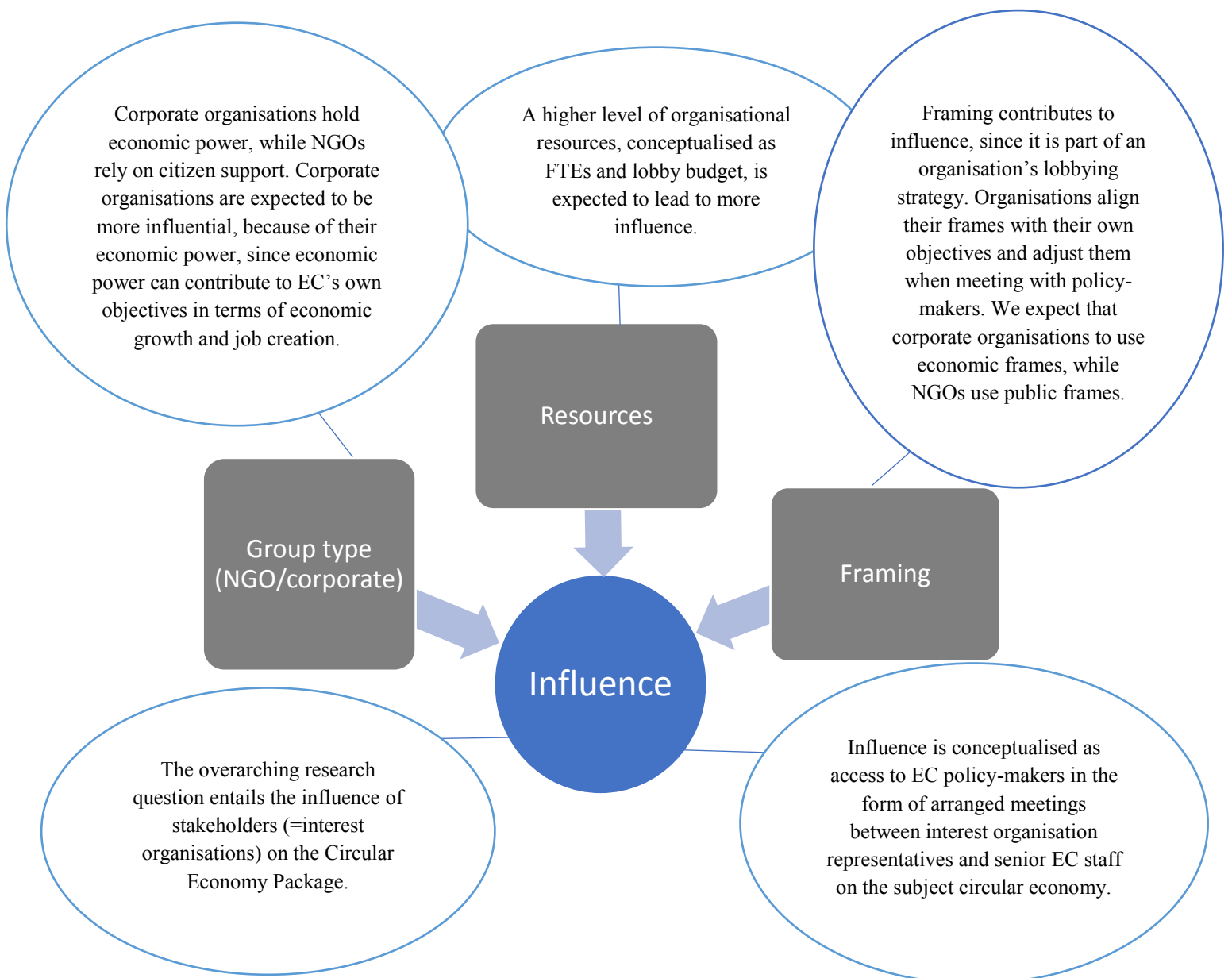
Moreover, we expect that a higher level of resources will account for a higher level of influence. We conceptualised resources as the number of FTEs and reserved lobby budgets. We assume that resources positively contribute to influence (Eising, 2007), since its absence would mean that an organisation would not be able to exert influence at all. If an organisation has FTEs and consequently a reserved lobby budget, with the purpose to shape policies in favour of an organisation's interest, it seems that this organisation at least tries to exert influence. The objective of FTEs or the organisation's lobbyist(s) is to influence policies. Consequently, we theorise that the more resources an organisation has at its disposal, the more capable it is to exert influence. Hence, we expect that a higher level of resources positively affect influence. In the context of this particular study, this implies that groups with a higher level of resources at their disposal will enjoy higher levels of access and thus have more meetings with European Commission's senior staff members on the issue.

Lastly, we expect that organisations employ framing as part of a lobbying strategy, in which the frames align with their objectives. Also, when meeting with policy-makers, they adjust frames accordingly. This means that interest groups take the objectives or view points of the policy-maker into account when presenting information or discussing implications of policies. Our analysis will show how framing contributes to influence as a part of an organisation's lobbying strategy. We expect that corporate organisations tend to use economic frames, while NGOs tend to use public (interest) frames more. In testing this expectation, we rely on the

qualitative data extracted from the interviews with important stakeholders and published position papers or fact sheets of the organisations the interviewees represent.

Following up on our theoretical expectations on the relationship between our variables, we now construct a more extensive conceptual model. It provides a visualisation of the expected relationships between the variables as well as the theorisation that lies beneath it. This conceptual model is displayed below, in figure 3.

Figure 3: Extensive conceptual model



3. RESEARCH DESIGN

In this section, we operationalise the concepts outlined in the theoretical framework and justify the choices concerning the type of research and the data collection. This research relies on quantitative data as well as qualitative data. We interpret these data in the light of our theoretical expectations.

3.1 Case selection

Following up on Woll's argument (2007: 74) on researching influence, this dissertation is carried out in a context-specific way, since we focus on the influence of stakeholders on the European Commission's Circular Economy Package. More specifically, this entails all the proposed policies within the Circular Economy Package: "Closing the Loop". This involves an EU action plan and legislative proposals or directives on waste, packaging waste, landfill and electrical/electronic waste ("Circular Economy", n.d.).

"The circular economy paves the way for reinventing the economy, making it more sustainable and competitive. Consequently, the way the Circular Economy Package is shaped has implications for businesses, industries and citizens" ("Circular Economy", n.d.). Naturally, interest groups conduct lobbying activities in order to shape this policy area in such a way that it is beneficial for them. We analyse the stakeholders' influence on this policy domain starting from December 2014 onwards, since this is when the European Commission announced to develop a Circular Economy Package ("Circular Economy", n.d.; Dijl, 2015). In doing so, we also account for the open consultation on the topic which can provide a helicopter view on the number of interest organisations on this issue. Hence, we demarcate the time frame of our research from 1 December 2014 until 1 December 2017.

3.2 Data collection method

"Influence is exercised through different channels, some of which unobservable, which makes it difficult to measure" (Dür, 2008b). This is already discussed in the literature review. Capturing all these channels is rather challenging and would not be achievable within the time frame of this dissertation. Interest groups shape policy outcomes through direct lobbying of policy-makers (Hansen, 1991), of which the most direct way of lobbying is to actually meet with policy-makers. We therefore define influence as access to policy-makers. More specifically, to EC's senior staff members, because we assume that they have a considerable say in the development of (circular economy) policies, since they hold a senior position in the

European Commission. Although access is not equal to influence, it is a strong indicator for influence (Hansen, 1991). More importantly, access is observable since datasets have been developed that register meetings between interest groups representatives and EC officials.

As Dür (2008b) already mentioned in his research note on the influence of interest groups, researching influence would become easier if researchers had better data at their disposal regarding interest groups' involvement in the EU decision-making process. Luckily, we currently have better data regarding the involvement of interest groups in the EU's decision-making process. Databases like Integritywatch, and LobbyFacts provide data about meetings with policy-makers, lobby budgets and the number of FTEs an organisation has at its disposal. These databases extract some of the data from the Transparency Register.

The European Commission has made firm commitments in order to pursue more transparency regarding lobbying activities. Senior EC staff members are only allowed to meet with lobbyists that are registered in the European Transparency Register. The Transparency Register, created in 2011, is a joint register for lobbyists by the EC and EP (Integritywatch.eu, n.d.). Registered organisations provide general information about the interests they represent, their lobby budgets, the number of FTEs, among other things. However, the register is not mandatory (yet).

Since December 2014, senior staff from the European Commission are also obligated to disclose details of meetings with lobbyists on their website. This includes the name of the organisation, time, location and subject of the meeting. The reporting and publication of this information is the responsibility of EC's senior staff members (Integritywatch.eu, n.d.). According to the 'Communication from the President to the Commission' (Juncker, 2014: 9), Commission Members are ought to pursue balance and representativeness in their meetings with stakeholders.

Integritywatch.eu is an interactive database that provides an overview of lobby meetings between organisations and the EC. It connects information from the Transparency Register with information disclosed by the European Commission's senior staff members. The combination of these datasets provides a comprehensive database that can be used for this dissertation. The database provides detailed information about meetings with Commissioners, Vice-Presidents, Director-Generals and cabinet members. Also, the database contains information about the number of lobbyists involved on a meeting's subject, the most active interest organisations, the organisation type and its budgets. This dissertation therefore consults the Integritywatch.eu

database extensively. Additionally, we use the LobbyFacts.eu database, which is also a platform providing essential data about lobbying in the European institutions (Lobbyfacts.eu, n.d.).

In addition to our quantitative data extracted from the databases, we conducted semi-structured interviews with representatives of important stakeholders on the issue. We did this in order to extract in-depth information on organisations' lobbying strategies, resources, and the use of framing. In doing so, we can provide more context to our findings as well as gain more insights in differences between NGO and corporate lobbying and possible underlying mechanisms. Consequently, we can formulate a more coherent and comprehensive answer to our research question.

We selected representatives of important stakeholders, that have shown to be very active interest organisations on the topic of circular economy. We contacted multiple corporate organisations as well as NGOs that participated in the open consultation on the circular economy policies, published position papers and belong to the top 10 organisations (corporate or NGO) that have had the most meetings with senior staff members of the European Commission on the issue (Integritywatch.eu). In doing so, we can rely on information from important stakeholders that can be assumed to have 'inside information' on lobbying processes on circular economy policies as well as extensive contextual information on the issue. Unfortunately, it was rather difficult to arrange multiple interviews with both NGO representatives as well as corporate organisation representatives.

Luckily, we were able to arrange an interview with the regulatory affairs manager of an important corporate interest organisation and industry representative. Also, we were able to arrange an interview with a senior policy officer (product policy and resource conservation) of an important NGO stakeholder. Consequently, we conducted two interviews that matched our criteria and provided us with extensive information on our research topic. The questions of the semi-structured interviews flow from our theoretical expectations and pursue to test these. Furthermore, they aim to provide contextual information on how organisations pursue to exert influence on EC's circular economy policies. Additionally, they are aimed to expose possible mechanisms between the variables in our research. The outline of the research questions can be found in Appendix B.

3.3 Operationalising the key variables

The information we extract from these interviews will be incorporated into our research results on all variables and will be reflected upon in the light of our theoretical expectations and ultimately our research question.

The dependent variable, and also the central concept in this study, is ‘influence’. Since we conceptualised influence as access to policy-makers in the European Commission, we have to operationalise this variable. In order to measure the access to European Commission’s policy-makers (senior staff members), we look at the number of meetings organisations have been able to arrange, starting from December 2014. This is right after the EC announced it wanted to develop a comprehensive Circular Economy Package (Dijl, 2015).

The Integritywatch database provides information about the number of meetings held on a certain topic, with whom and at what hierarchy level within the European Commission. By specifying on the subject (circular economy, waste, packaging, landfill), we determine how many meetings took place between interest organisations and senior staff members of the European Commission. In doing so, we have an overall image on how many meetings were held with regard to the issue(s). We will further analyse the influence on circular economy policies and possible differences between the influence of NGOs and corporate organisations by comparing the 10 most influential corporate organisations with the 10 most influential NGOs. In doing so, we can elaborate on possible differences and possible explanations.

Furthermore, we specify with whom these meetings were held and at what hierarchy level. Integritywatch shows data about meetings held with Commissioners, their cabinet members and the Director-Generals (DGs). Unfortunately, the database does not hold information regarding meetings with lower level staff members of the European Commission, since it is not (yet) required or agreed upon to also disclose this information.

With respect to the independent variables, group type is perhaps the most important one. We conceptualised group type being a corporate organisation (stakeholder) or an NGO stakeholder, categorised as such in the Transparency Register. We operationalise this by consulting the Integritywatch database, that extracts information from the Transparency Register regarding the stakeholders’ group type. So when we talk about corporate organisations or NGOs, we refer to how these organisation categorised themselves as such. By using Integritywatch database, we are able to specify the data on meetings held by corporate organisation or NGO stakeholders.

Another key independent variable is ‘resources’, conceptualised as the number of lobbyists (in FTEs) and the lobby budget that organisations (NGO/corporate) have at their disposal. We operationalise this by consulting the Lobbyfacts.eu database as well as the Integritywatch database, which both extract data from the Transparency Register that provide insights with regard to the organisation’s resources. We analyse the resources for both the 10 most influential or active corporate organisations as well as the 10 most influential NGOs.

Moreover, framing is defined as making some aspects of a topic more salient, while ignoring others, in order to shape policy outcomes to the interest organisation’s favour. Due to methodological difficulties, there is only very little data about interest groups’ framing strategies. We do not have the necessary tools to conduct text analysis for dozens of position papers. Hence, we operationalise framing by focussing on two important and active stakeholders (one corporate, one NGO) on the circular economy issue. We extract data from the conducted interviews in order to gain insights on employed frames, as well as how and why they are used and adjusted. We aim to elaborate on possible differences between corporate organisations and NGOs with regard to the use of economic and public interest frames.

Lastly, we clarified what we mean when we talk about the Circular Economy Package: proposed circular economy policies and directives as well as the Action Plan. We operationalise this by specifying our search within the Integritywatch database on the subject of ‘circular economy’ and related subjects, such as ‘waste’, ‘packaging’ and ‘landfill’. In doing so, we limit our analysis to the meetings that concern the issues surrounding circular economy issue.

Table 1 provides a summary of the concept definitions relevant to this dissertation. Also, it displays the indicators used for these concepts as well as how the concepts, including the dependent variable and independent variables, are operationalised in this dissertation.

Table 1: Definition of concepts, indicators and operationalisation

Concept	Definition	Indicators	Operationalisation
<i>Stakeholders</i>	Interest organisations.	Organisations: <ul style="list-style-type: none"> Registered in the Transparency Register, active on the topic That used EC's open consultation on the issue circular economy That have arranged meetings with EC's senior staff members on subjects surrounding circular economy 	First providing a helicopter view on the field of involved stakeholders by analysing the results from the European Commission's open consultation on circular economy policies. We then specify the field of stakeholders by consulting Integritywatch' and Lobbyfacts' database. The organisations in this database have managed to arrange meetings with the EC.
<i>Circular Economy Package</i>	Legislative policy proposals/directives and Action Plan in the European Commission's Circular Economy Package.	Policies involving: <ul style="list-style-type: none"> Circular economy in general Waste (reduction) Packaging waste Landfill Electronical waste Resource efficiency 	We specify this policy domain by consulting Integritywatch' database and search for meetings with the subject 'circular economy'.

<p><i>Influence</i> [Dependent variable]</p>	<p>Access to policy-makers in the European Commission.</p>	<p>Meetings with senior staff members of the European Commission (Commissioners, Vice-Presidents, cabinet members and DGs) on the subject circular economy</p>	<p>Consulting the Integritywatch’ database and analyse the number of meetings between interest groups representatives and staff members of the European Commission on the subject ‘circular economy’. We compare the influence of the 10 most influential corporate organisations with the 10 most influential NGOs on the issue. Additionally, we use the data from the conducted interviews with important stakeholder representatives.</p>
<p><i>Group type</i> [independent variable 1]</p>	<p>The type of stakeholder; corporate organisation or NGO.</p>	<p>Declared as <i>corporate</i> organisation or <i>NGO</i> in the Transparency Register*. *With regard to the results from the open consultation, we assume NGOs to have categorised themselves only as ‘civil society organisation’.</p>	<p>Specifying interest organisations on ‘circular economy’ on category NGO/corporate, using the Integritywatch’ database. Specified information on the 10 most active NGOs and corporate organisation is extracted from Lobbyfacts’ database. Additionally, we use data from the conducted interviews with important stakeholders.</p>

<p><i>Resources</i></p> <p>[independent variable 2]</p>	<p>The number of lobbyists and lobbying budget organisations have at their disposal.</p>	<ul style="list-style-type: none"> • Number of lobbyists in FTEs • Organisation's lobby budget 	<p>Consulting the Lobbyfacts.eu database, and the Integritywatch database on declared estimated minimum lobby budgets and the number of lobbyists, declared as Full Time Equivalents (FTEs) in the Transparency Register. Additionally, we use data from the conducted interviews with important stakeholders.</p>
<p><i>Framing</i></p> <p>[independent variable 3]</p>	<p>Making some aspects on a topic more salient/emphasising certain aspects on a topic, while ignoring others, in order to shape policies to the favour of an the interest organisation.</p>	<ul style="list-style-type: none"> • Emphasis on environment and consumer rights (NGO) <ul style="list-style-type: none"> – <i>public (interest) frame</i> • Emphasis on economy; jobs, growth and competition (corporate) <ul style="list-style-type: none"> – <i>economic frame</i> 	<p>Extracting data from semi-structured interviews with representatives from important interest groups; NGOs as well as corporate organisations.</p>

Following up on our research design, we describe our analytical strategy in the next chapter. Thereafter, we present the research results and analyse them in the light of our expectations. We refer back to our research question and discuss the implications of our findings. Also, we place our findings in the broader spectrum of existing research on the topic and evaluate the added value as well as the shortcomings of our research. Lastly, we provide some recommendations for future research.

4. ANALYSIS

4.1 Analytical strategy

We describe our research results and analyse these in the light of our theoretical expectations. In doing so, we use the (quantitative) data extracted from the Integritywatch database, as well as the information extracted from the conducted interviews with representatives of important stakeholders. The data from the interviews can be analysed as complementary to the obtained quantitative data. Hence, we connect all the data with our theoretical insights in order to formulate a coherent answer to our research question. Consequently, we provide a synthesis of the acquired knowledge on our research topic.

We first provide a helicopter view on the active interest organisations (stakeholders) on the issue. This gives us an indication of the overall stakeholder playing field and allows us to specify our analysis to the part of the field of stakeholders that have arranged meetings with the European Commission's senior staff members on the issue, because we operationalised influence as such. We then further the analysis by focussing on only the corporate organisations and NGOs who sought to influence the circular economy policies by arranging meetings on the topic with European Commission's senior staff members. From here onwards, we combine the data from Integritywatch with the data extracted from the interviews with important stakeholder representatives, in order to generate more coherent insights on our research topic.

4.2 Analysis









We start off with providing a helicopter view of the stakeholders on the circular economy issue; the Package. The results of the EC's open consultation on the topic provide insights on the total amount and distribution of stakeholders. In this dissertation, we focus on NGOs and corporate organisation stakeholders. Therefore, we filter out private persons, public authorities and research institutions and leave out individuals, public authorities and research institutions.

The European Commission's open consultation on circular economy in August 2015 counts a total of 1281 respondents. According to results of the open consultation, 135 respondents categorised themselves as civil society organisation (NGO), 346 as a professional organisation, 41 as an international organisation and 222 as a private enterprise (corporate organisations). Since we demarcate our stakeholder analysis by focussing on corporate organisations and NGOs, the data accounts for (corporate and NGO) a total of 744 stakeholders. Hence, we find that our stakeholder playing field on the issue consists of 744 interest organisations. This is

because these organisations have shown lobbying activities by expressing their opinions and interests via the open consultation about circular economy policies. Therefore, they can be considered as active stakeholders or interest organisations with regard to European Commission's Circular Economy Package.

Moreover, we assume that NGOs categorise themselves as civil society organisations when participating in the open consultation, while corporate organisations would categorise themselves as private enterprise, professional organisation or international organisation. Consequently, we find that 18,15% (135) of the 744 interest organisations are NGOs. The other 81,85% (609) are corporate organisations. We thus find that the corporate organisations are strongly represented compared to the NGOs in our field of stakeholders.

Table 2: Distribution of respondents to the EC's open consultation on circular economy

		Answers	Ratio
As an individual		337	26.31%
Public authority		74	5.78%
Academic/research institution		47	3.67%
International organisation		41	3.2%
Civil society organisation		135	10.54%
Professional organisation		346	27.01%
Private enterprise		222	17.33%
Other		79	6.17%

Source: European Commission

We now provided an helicopter view on the field of stakeholders or more specifically, the field of interest organisations on circular economy policies. These organisations have sought to influence the Circular Economy Package by participating in European Commission’s open consultation. Nevertheless, fewer organisations have sought to influence the Circular Economy Package by also arranging meetings with European Commission’s senior staff members (table 3 and 4). Following up on our helicopter view, we therefore narrow down our stakeholder analysis on the Circular Economy Package by consulting the data available via Integritywatch (www.integritywatch.eu). We find that 194 organisations – all registered in the European Transparency Register – account for a total of 394 meetings with EC’s senior staff, being Commissioners, Vice-Presidents, Director-Generals and cabinet members. These entail meetings with regard to the subject ‘circular economy’. We also find that a total of 949 lobbyists were involved in these meetings. All of these lobbyists are registered in the Transparency Register. It is quite remarkable that of the 744 interest organisations only 194 (approximately 25%) – of which 168 (approximately 22%) NGO and corporate – have arranged meetings with the EC on top of the open consultation. We therefore find that only a small part of all interest organisations pursue or are allowed to clarify their positions and interest on the issue(s) via meetings with senior staff members of the European Commission. This part can thus be considered the core of the field of stakeholders.

Table 3: Overview on the number of active organisations and lobbyists that arranged meetings with senior EC staff on the subject circular economy

Organisations	Lobbyists	Meetings
194	949	394

Source: Integritywatch

Furthermore, 137 of these 194 organisations are classified as corporate and 31 as NGOs. This is exactly the same distribution as the one we found in the open consultation’s results, namely 18,15% NGO and 81,85% (table 4). This is only if we focus on the NGOs and corporate organisations and leave out the other organisations. Hence, we find that the other 26 organisations are classified in the Transparency Register as consultants, thinks thanks or municipals. These data are visualised in figure 4 below. It is remarkable to find that the distribution (in percentages) of interest organisations (NGO and corporate) are the same for the

open consultation results as well as meetings with the EC on the issue. Additionally, of all the corporate organisations that participated in the open consultation, roughly 22% also arranged meetings with the EC. This is also the case for the NGOs. These numbers indicate that this ‘core’ of stakeholders is, in relative terms, the same for corporate organisations and NGOs. Hence, the distribution between NGOs and corporate organisations are approximately the same in the results of the open consultation as well as with regard to meetings with EC’s senior staff members.

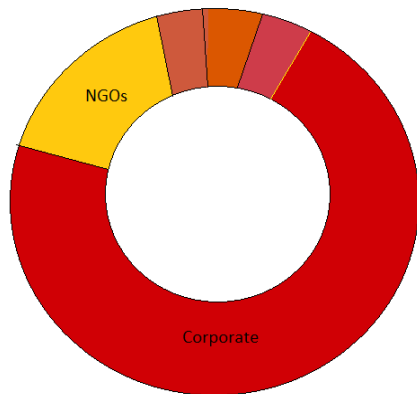
Moreover, we find that 142 organisations have had meetings with cabinet members, good for a total of 281 meetings and 657 lobbyists. Additionally, 58 organisations were able to arrange a total of 71 meetings with Directors, involving 349 lobbyists. Lastly, 44 organisations met with Commissioners, with a total of 42 meetings, involving 314 lobbyists. The distribution of meetings with European Commission’s senior staff members, according to hierarchy level, is visualised in figure 5.

Table 4: Distribution NGO/corporate in open consultation and with regard to meetings with EC

	Corporate Organisations	NGOs	Total
Open Consultation	609 81,85%	135 18,15%	744 100%
Meetings	137 81,85%	31 18,15%	168 100%

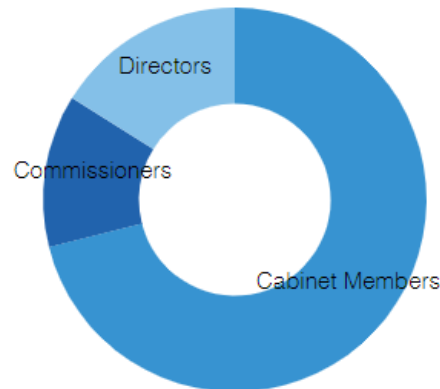
Source: European Commission and Integritywatch

Figure 4: Distribution of organisations



Source: Integritywatch

Figure 5: Distribution of meetings according to hierarchy level



Source: Integritywatch

Table 5: Average number of lobbyists and average number of meetings per organisation

Average number of lobbyists per organisation	Average number of meetings per organisation
4,89	2,03

It is interesting to see that, of all the interest organisations that arranged meetings with EC’s senior staff members, the vast part consists of corporate organisations. The number of NGOs is more than 4 times as little. According to the Integritywatch’ database, the 10 most active stakeholders consist of 8 corporate organisations, 1 NGO and 1 think tank. This also indicates that corporate organisations dominate with regard to arranged meetings (figure 6). Following up on the data described above, we also find that the average number of lobbyists per organisation here is close to five and the average number of meetings arranged is two (table 5). This gives us an indication when we further our analysis and compare NGOs and corporate organisations.

Figure 6: Top 10 lobby organisations with the most high-level meetings with the European Commission on the subject circular economy



Source: Integritywatch

4.2.1 Group type: corporate organisations and NGOs

We specify the scope of our analysis to the access (influence) of NGOs and corporate organisations, the two largest stakeholder categories on the topic. Altogether, they account for 168 organisations, 354 meetings and 693 lobbyists.

Evidently, we find that NGOs are outnumbered by corporate organisations. However, NGOs seem just as effective as corporate organisations, since the average number of meetings is almost the same. Likewise, the average number of lobbyists is approximately the same. This is remarkable, since mostly corporate organisations are considered to have more resources at their disposal than NGOs. This, however, does not seem the case, according to our data about resources. Nonetheless, corporate organisations still outnumber NGOs on the issue and therefore also outnumber them with regard to resources. Moreover, Juncker's (2014: 9) Communication to the European Commission, as mentioned earlier, states that staff members "should seek to ensure appropriate balance and representativeness in the stakeholder they

meet”. So with respect to this statement, senior staff members of the European Commission succeeded in finding this balance and representativeness. In relative terms, at least.

According to interviewee B (NGO), certain EC staff members seem to think that the positions of NGOs, with regard to environmental topics, are mostly the same. Therefore they tend to have less meetings with them on a certain topic. Nonetheless, their technical expertise is much appreciated. Generally speaking, NGOs fight for a cause, in this case the preservation of the environment, increasing sustainability and protecting natural resources. They push for change, since current environmental regulation does not seem to fulfil their cause and objectives sufficiently. However, the consequences of more or ‘better’ regulation on environmental issues, like circular economy, does not affect them as an organisation, since they do not have to change their business models or value chains. Consequently, they rather “*push for system change*” (interviewee B) and approach the circular economy issue in a broader way.

Contrary to NGOs, the positions of corporate organisations cannot be considered as approximately the same. Interests, concerns and preferences differ across (and within) industries as well as policy areas. However, when these positions do overlap, they are mostly voiced via business associations. Referring to the literature discussed in the second chapter, businesses tend to fight for preservation of the status quo, while NGOs push for changing the status quo (Dür, 2015). It is therefore not surprising that the corporate organisations outnumber NGOs, since they find themselves in a defensive lobbying position while pursuing to preserve the status quo or at least stay close to it. Nonetheless, a smooth transition towards a circular economy asks for realistic, achievable policies for businesses. In order to ensure this, and also hear out the diverse positions of corporate stakeholders, the European Commission holds meetings with these stakeholders. This could explain the high number of meetings with corporate organisations compared to that with NGOs.

With regard to the independent variable ‘group type’ our theoretical expectation here was that corporate organisations are able to exert more influence than NGOs. We theorised that economic power is a better means to influence policy-makers. Effectuating a smooth transition towards a circular economy asks for business to get on board and in the process create jobs and realise economic growth, since this is one of the main priorities of the European Commission (European Voice, 2014). When we analyse how group type accounts for influence, we tend to conclude that corporate organisations are indeed more influential than NGOs. With respect to the theoretical expectations, we can therefore state that group type to a certain extent accounts

for the influence of stakeholders. Corporate organisations have had more meetings with policy-makers on every hierarchy level, compared to NGOs.

We elaborate on this by referring back to our theoretical framework. (Dür, 2015: 956-958) argued that “the European Commission actively seeks policy areas in which it can propose legislation, regardless its limited scope of manoeuvre, since it wants to remain an active player in the legislative politics” (Dür, 2015: 956-958). The Circular Economy Package (also) contains proposed legislation that creates opportunities to change the status quo. Dür (2015: 952) also found that NGOs or citizen groups tend to support new regulations more frequently, since it changes the status quo. This means that that NGOs hold a more offensive lobbying position on the circular economy topic, since they favour changing the status quo. Corporate organisations on the other hand, often oppose new regulations, since changing the status quo is usually not beneficial for businesses and industries. Consequently, corporate organisations tend to hold a more defensive lobbying position on circular economy issues. This could be an explanation why corporate organisations arrange so many meetings with policy-makers on this issue. In order to increase the likelihood of adopting new legislation however, the European Commission often seeks societal/citizen support via NGOs or citizen groups (Dür, 2015). NGOs could therefore have an advantageous position here. Nevertheless, we find that corporate organisations, outnumber NGOs on meetings with policy-makers, which indicates that economic power is a better means to gain access to policy-makers, than citizen support. Klüver (2012) found that both citizen support and economic power positively contribute to lobbying the EC. Nonetheless, we find that economic power possibly is a better means to influence the EC than citizen support. There is however some nuance to this, that we will elaborate upon.

Table 6: Number of meetings and lobbyists for NGOs and corporate organisations on the subject circular economy

	Corporate		Non-Governmental		Total	
	Quantity	%	Quantity	%	Quantity	%
Organisation	137	81,5	31	18,5	168	100
Lobbyists	572	82,5	121	17,5	693	100
Meetings	294	82,1	64	17,9	358	100

Source: Integritywatch

Table 7: Average number of meetings and lobbyists per (NGO/corporate) organisation

	Average number of lobbyists per organisation	Average number of meetings per organisation
Corporate	4,18	2,15
Non-Governmental	3,90	2,06

It is interesting to see that on average, both group types arrange approximately the same number of meetings, using the same number of lobbyist, declared as FTEs (table 7). Contrary, if we look at the 10 most influential corporate organisations and compare them with the 10 most influential NGOs, this seems not to be the case (figure 7 and figure 8). We find that these 10 corporate organisations arranged 88 meetings, involving 66,5 lobbyists in FTEs. NGOs on the other hand, arranged 43 meetings, involving 65,25 lobbyists. So if we use the same number of organisation for each group type, we still find that corporate organisations are more influential than NGOs. Hence, the data also indicate that most influential corporate organisations seem to be more efficient and effective with their resources, since the number of lobbyists in FTEs for corporate organisations is approximately the same as that of the NGOs.

Figure 7: Top 10 influential NGOs



Source: Integritywatch

Figure 8: Top 10 influential corporate organisation



Source: Integritywatch

Hence, we have to put our findings in perspective. There is more nuance to this than the data is initially shows us. The information we collected from the interviews provides us with more context on these findings. This is has to do with how efficiently and effectively organisations are able to communicate and articulate their preferences to policy-makers. Like mentioned above, NGOs are mostly in favour of enhanced environmental legislation and will therefore push to realise that. Following up on the provided information from interviewee B (NGO), NGOs tend to arrange less meeting with the EC, but nevertheless are able to articulate their preferences and positions. *“We have approved to arrange crucial meetings, but compared to what other stakeholders get, it is limited. However we organise efficiently and therefore need one meeting instead of five”*. Businesses, on the other hand, have interest in preserving the status quo. They unite themselves in business associations or platforms to represent and defend the interests of a certain industry, but at the same time, they seize opportunities to articulate their preferences on their own. This information from the interviews can be confirmed when we look at the top 10 influential corporate organisations on the issue (figure 8). The Alliance for Carton Beverages and the Environment (ACE) is a business association of packaging companies that represent TetraPak, among other businesses. TetraPak is a global market leader in packaging and packaging materials and therefore also has a considerable stake on the issue of circular economy. ACE is an active interest organisation and succeeded at arranging multiple

meetings with the EC, but so did TetraPak. They even talked to the same officials. This indicates that businesses not only employ lobbying activities, or ultimately seek influence, via their business associations or platforms, but also arrange meetings on an individual basis (lobbying for their own objectives). According to the interviewees, this is not unusual. Therefore it seems that corporate organisations indeed are less effective or efficient in articulating their preferences and expressing their positions on the subject of circular economy, since their cause is diffuse and not as compatible as the cause or interests of NGOs. Industry representatives or business associations, like ACE, are able to voice common interests of similar businesses. Additionally, businesses within that industry have their own specific interests. Consequently, these businesses perform complementary lobbying activities. This could account for the vast number of active corporate organisations on the circular economy topic.

The research results thus show that corporate organisations have more influence on the Circular Economy Package. This lines up with our theoretical expectations about the relationship between group type and influence. The data show that NGOs are outnumbered, arranged fewer meetings and are therefore less influential, since it is conceptualised as such. On average, however, corporate organisations and NGOs seem to be just as effective, or in this case influential, in arranging meetings with policy-makers. The nuance, here lies in the nature of the issue, as well as the nature of the organisations. Circular economy as such, is an overarching concept of reshaping the way we use, reuse and process our resources and lies in the spectrum of environmental policies. Policies that are beneficial to the environment are usually backed up by (environmental) NGOs, since it contributes to their cause of a stronger environment and more sustainable economy. It is therefore easier to align on this topic and voice their preferences in an effective manner. *“We, as an NGO, do not get approved a lot of meetings, since we are perceived as basically one (environmental) interest”* (interviewee B – NGO). Contrary, the corporate organisation have more diffuse interests on an individual level, although they manage to defend their common interests via business associations.

4.2.2 Resources

In order to get a better perspective on how resources account for stakeholders' influence, we compare the 10 most influential corporate organisations with the 10 most influential NGOs in the Circular Economy Package. We find that the resources, lobbyists in FTEs as well as the minimum lobby budget, of the 10 most influential corporate organisations and the 10 most influential NGOs are approximately the same (table 8 and table 9). However, the corporate organisations have been able to arrange twice as many meetings than the NGOs. When we look at the number of lobbyists or lobby budgets, it does not necessarily mean that it positively affects influence. This goes for NGOs as well as corporate organisations. According to the data from Integritywatch, it seems that the size of lobby budgets or the number of lobbyists do not have a relationship with the numbers of meetings arranged. For example, we find that EUROOPEN has way fewer resources at its disposal than PlasticsEurope, but still manages to arrange 8 meetings.

To get a more in-depth view on the relationship between resources and influence, we consulted the interviewees. Both of the interviewees endorse the importance of resources. Interviewee B (NGO) emphasises that more resources are needed when the organisation want to undertake enhanced lobbying activities. *“When the Circular Economy Package became more salient, also for the European Commission itself, we raised funds. In doing so, we raised resources and were able to put more people on the case”*. The interviewee B (NGO) elaborates on the importance of resources: *“Influence is always linked to financials and budgets. If you are not able to follow a policy process with dedicated policy officers, you have less time and you are less efficient in arranging meetings. Also, there is less time to for high profile communication and put on with other important stakeholders. When you want to create high profile communication material, you need to acquire additional funding”*.

Our theory about the importance of resources to the influence of interest organisations aligns with the information from the interviews. According to interviewee B (NGO), *“resources are a precondition for successful workstreams on the topic”*. However, we do not find a clear relationships when analysing the data from Integritywatch and Lobbyfacts. This is because there is more nuance to it than the data shows us. Interviewee A (corporate stakeholder) explains that resources are in the end very important, but how effective an organisation is with its resources depends on the people they hire and their personal resources. With these personal resources, we mean the languages they speak, their skillset, their expertise, social skills and

personal network. Also, it helps when people already have experience working in Brussels and know how the European institutions work. So the nuance here is that an organisation's resources are indeed really important, yet the people's/lobbyist's personal resources seem to be of considerable importance in order for an organisation to be influential. More specifically, to achieve their lobbying objectives.

Referring to the difference between NGOs and corporate organisation, interviewee A (corporate stakeholder) adds that *“corporate organisations, which have more economic power, are able to hire more experienced people. In general, they are able to offer them higher salaries. They can therefore attract people with better ‘personal resources’.* *Contrary, NGOs tend not to pay really high salary, but have really motivated people working for them. They defend a cause that is really appealing to them. Consequently, they are dedicated to the cause and do not need a high salary”.* When we look at the 10 most influential corporate organisations and the 10 most influential NGOs on the issue (table 8 and 9), we find that they approximately deploy the same number of lobbyists in FTEs. Nevertheless, corporate organisations arranged twice as many meetings. This is complementary with the latter quote. Organisations with more economic power or financial power are able to hire more experienced and connected lobbyists, who are consequently more effective in arranging meetings with policy-makers. So contrary to our theoretical expectations, more resources do not account for more influence. The quality of the resources, in this case the organisation's lobbyists, does account for how influential an organisation can be, according to the interviewees.

On the other hand, the people who work for (environmental) NGOs tend to work on multiple dossiers across multiple policy areas. They represent their constituencies as well as a common cause or interest, such as the realisation of a better environment or improved sustainability, which are quite ambiguous objectives. Hence, NGOs tend to dedicate their resources to salient issues, related to these objectives, in order to be as effective as possible. Interviewee B (NGO) mentioned that when the Circular Economy Package became more salient, the organisation raised funds in order to put more people on the case and create high profile communications on the topic. Lobbyists of corporate organisations or representatives of business associations however represent only their organisation (or industry) and its interests. Naturally, these interests tend to be more specific and unambiguous than those of NGOs on certain topics. Therefore, another explanation could be that corporate organisations are able to dedicate their resources to specific issues (within a policy area), even if these issues are not salient. Hence, they can voice their specific interests more efficiently on certain topics. Additionally, they can

provide relevant information about possible implications of certain policies on (important European) industries, for example. The latter is particularly interesting for policy-makers, since they pursue to isolate negative, unanticipated consequences of their (proposed) policies. Another explanation for the high number of meetings with corporate organisations, compared to that of NGOs, could be that corporate organisations are able to dedicate their resources to specific issues, even if they are not salient (at the moment). They tend to have more unambiguous, specific interests on certain issues and hence can provide policy-makers with useful information on possible negative economic consequences of policies, which is interesting for EC officials when developing policies. So not the resources *an sich*, but the quality of an organisation's resources as well as timely and adequate allocation of these resources could account for the influence of interest organisations.

Table 8: Top 10 most influential corporate organisations and their resources

Top 10 corporate organisations	Number of lobbyists (in FTEs)	Estimated minimum lobby budget in euros	Meetings
SUEZ	5,75	800.000	18
BusinessEurope	30	4.000.000	13
ORGALIME	3,75	400.000	11
Unilever	2	300.000	9
EUROPEN	1,5	50.000	8
ACE	4,5	200.000	7
AmCham EU	8,5	1.000.000	7
TetraPak International	1,5	200.000	7
Plastic Recyclers Europe	1	25.000	6
PlasticsEurope	8	1.500.000	5
Total	67 (66,5)	8.475.000	91

Source: Integritywatch, Lobbyfacts and Transparency Register

Table 9: Top 10 most influential NGOs and their resources

Top 10 NGOs	Number of lobbyists (in FTEs)	Estimated minimum lobby budget	Meetings
Aldersgate Group	5	300.000	8
BEUC	23,25	2.250.000	6
EEB	19,75	3.250.000	6
RREUSE	3	50.000	5
Friends of the Earth Europe	5,75	750.000	4
European Climate Foundation (ECF)	3,75	400.000	3
World Economic Forum	0,5	10.000	3
CCE	3	10.000	3
SFE	1	50.000	3
Green 10	0,25	10.000	3
Total	65 (65,25)	7.080.000	44

Source: Integritywatch, Lobbyfacts and Transparency Register

4.2.3 Framing

We already emphasised the difficulties regarding measuring and analysing the concept of framing. Since we still want to generate insights on framing and how it accounts for influence, we extract information from the interviews. While this only provides a limited perspective on the role of framing, it does give us the opportunity to assess to role of framing more extensively.

The interviewees confirm that framing is indeed an integrated part of the lobbying process. Framing is used in meetings, in policy papers, in press releases, as well as other activities that contribute to the lobbying process. One interviewee (NGO) explains that in order to express the importance of a circular economy as well as to clarify what it entails, the organisation published multiple factsheets about how the European Union can get “get the circular economy right” (European Environmental Bureau, 2016a). These were meant for policy-makers who were not (yet) an expert on the topic or did not yet delved into the concept of a circular economy. The factsheets discusses every aspect of the circular economy, using case studies, providing facts and policy recommendation to tackle particular issues. The person elaborates by saying that for many policy-makers at the time, circular economy was still as synonym for end of life cycle and waste. *“We framed it as a new way of producing and consuming”* (interviewee B – NGO). This frame sheds a new light on how the concept of a circular economy is perceived. Instead of focussing on the end of life cycle and waste management, they framed it as a new way of how goods are produced, how resources are (re)used, how we consume and ultimately, how we structure our economy. Hence, it made the context of the concept and the concept *an sich* more appealing for policy-makers.

One of the interviewees (corporate stakeholder) stated that they tend to use frames that refer to economic benefits and economic growth, but also ‘environmental protection’ and ‘recycling’. The latter is the main frame we find in the organisation’s position paper (ACE, 2016). *“The European Commission is usually over-ambitious when it comes to new legislation. We provide them with technical information and illustrate implications and possible negative consequences of legislation”* (interviewee A – corporate stakeholder). Contrary, interviewee B (NGO) states that *“NGOs, in general, do not want to be associated with economic growth as such”*. Besides that, they use multiple frames, depending on to whom it is addressed. *“When we address consumers, we use frames like ‘sharing, reusing and optimising the use of resources’, but also emphasising better utility and extension of product’s lifetime* (interviewee B – NGO)”. Furthermore, the person explains that for industries, they frame circular economy with a focus

on productivity gains, while for the health sector they focus more on the use of certain substances and the effects on health. *“Usually however, we emphasise how circular economy is environmentally and economically beneficial. We focus on competitiveness and job creation and make the case that our economy and our companies depend on a large extent on finite resources. This means that there is a risk of significant price increase of (imported) resources for the EU”* (interviewee B – NGO). This quote shows that NGOs also use economic frames to emphasise the economic benefits of circular economy initiatives. However, we find that these economic frames are often linked to benefits for both the economy as the environment, when we analyse the organisation’s position paper (European Environmental Bureau, 2016b). More specifically, they tend to link economic benefits, like increased annual turnover for business, to environmental benefits, such as reduction of GHG emissions.

Additionally, interviewee B (NGO) discusses how his organisation adjusts frames when meeting or communicating with the European Commission. When the circular economy was still in the agenda setting phase, it was framed as being absolutely essential to change the way we produce our goods and how we put them on the market, in order to succeed as a Union. Therefore, a transition towards a circular economy was needed for the European Union to be less resource-dependent. Once the Circular Economy Package was out however, the frame changed. They then focussed more on the environmental benefits of a circular economy and its contribution to the objectives of the Paris Agreement, also during meetings. Hence, they used more traditional, environmental frames, like pollution, waste, and chemicals contained in materials. For the non-environmental part of the European Commission and meetings with business stakeholders, they focussed more on job creation and competitiveness. *“In meetings with policy-makers, we argued that new legislation is not required per se when we better use existing legislation, such as the Ecodesign Directive”* (interviewee B – NGO). The use of framing also depends with whom you meet and at which hierarchy level: The broader the subject, the higher up in the hierarchy, the broader the frame.

With respect to the concept of framing, we assumed that it is a part of an organisation’s lobbying strategy and contributes to the interest organisation’s influence. Our theoretical expectation here was that organisations employ frames that align with their own (lobbying) objectives and adjust frames according to the policy-makers they meet with. According to the information from the interviews, we find that framing is indeed part of the lobbying process and frames are adjusted constantly. Consequently, how frames are adjusted depends on the phase in the policy cycle, as well as the audience or policy-makers and stakeholders an organisation meets with. This is an

important finding regarding the role of framing and how organisations use framing to exert influence. Frames are used as an angle to perceive the concept of circular economy. Depending on the audience and context, certain aspects of the circular economy are emphasised, while putting less focus on other aspects. It is interesting to see that the frames used by the corporate organisation and the NGOs do not differ as much, only that NGOs, in general, do not want to be associated with the term ‘economic growth’. However, they are not afraid to use other economic frames like ‘job creation’ and ‘competitiveness’. Moreover, corporate organisations also employ public interest or environmental frames such as ‘environmental protection’ and ‘recycling’. All things considered, we conclude that framing is indeed an integrated part of an organisation’s lobbying strategy, frames are constantly adjusted – depending on the policy phase and the audience – and that it is ultimately used to influence policies.

4.2.4 The influence of stakeholders

We find that 194 organisations were able to arrange one or multiple meetings with European Commission’s senior staff members: Commissioners, Vice-Presidents, directors and cabinet members. Since we conceptualised influence as access to policy-makers, we measure the influence of stakeholders by the number of meetings they have had with the EC’s senior staff members. Consequently, 194 stakeholders influenced policy-makers directly via 394 meetings on the topic circular economy. Although these findings are not equal to the actual exerted influence from stakeholders on policy-makers, it does give an indication, since their access indicates the inside lobbying efforts of these organisations on the Circular Economy Package. Based on the number of meetings, our findings show that corporate organisations are more influential than NGOs. Nevertheless, a more nuanced interpretations of these findings can be formulated by using the information from the interviews.

Both interviewees emphasise the importance of meetings with policy-makers in order to exert influence. On the hand, because the European Commission arranges meetings with relevant stakeholders for democratic purposes. Hence, they meet with leading businesses, their competitors, manufacturers, consumer organisation and product representatives. Besides the democratic purposes, the European Commission does this to reflect on the proposals’ feasibility and possible impediments with regard to its implementation. Interviewee A (corporate stakeholder) explained that the European Commission is usually very ambitious with new policy proposals, like the ones in the Circular Economy Package, but sometimes overlooks consequences and negative side effect. The person highlighted that certain objectives in the

draft proposals in the Circular Economy Package could have severe implications for the European economy and its industries. Businesses could move to China for example, when the costs to meet the legal requirements for products or packaging in Europe are too high. Consequently, there is a risk of losing industries because of too strict legislation. This sort of technical information and feedback provided by the stakeholders is valuable for the European Commission. Simultaneously, it is crucial for an organisation to efficiently process and provide relevant information in order to obtain access to policy-makers and ultimately exert influence (Chalmers, 2011: 471; Bouwen, 2002; Eising, 2007).

Moreover, arranging meetings with policy-makers are especially important for stakeholders, because valuable relationships can be established. According to one of the interviewees, *“it is very useful when European Commission staff members know who we are, what we represent and what our ideas of good policies are. This can be realised by arranging fruitful meetings. Afterwards, they can reach out to us and ask for technical information or elaborate on our ideas”* (interviewee B – NGO). Naturally, how important these meetings are, depends on the phase of the policy cycle. When drafting policy proposals, the European Commission plays a key role. Afterwards, when the European Commission submits the circular economy legislative proposals, the European Parliament and Council take over. The focus of lobbying activities then mostly shifts towards the other European institutions. However, the focus of lobbying activities also shifts within the European Commission. *“When we want to discuss broader subjects about circular economy, we aim higher up in the hierarchy than we want to discuss technical details, for example”* (interviewee B – NGO). Important stakeholders within the industry sometimes get together on a broad issue regarding circular economy and then meet with Commissioners. *“This is of course not effective when we just want to discuss technical details on an issue”* (interviewee B – NGO).

4.2.5 The policy-makers

We further specify our analysis on the influence of stakeholders on the Circular Economy Package, by analysing the policy-makers with whom the stakeholders met with. In doing so, we can generate more inclusive insights, because the hierarchy-level of the policy-maker with whom organisations meet, together with the policy-maker's portfolio are also relevant when we analyse the influence of stakeholders. Consequently, it is necessary to scrutinise the access to these policy-makers in more detail. With regard to the meetings held between stakeholders and senior EC staff members, the data from Integritywatch provides information about the policy-maker's hierarchy level. The hierarchy levels entail Commissioner (or Vice-President), director and cabinet member. Directors or Director-Generals are responsible for the management of/are the head of a Directorate-General. These cover a specific policy area. DG Environment, for example, is the EC's department that is responsible for EU policy on the environment. They propose and implement policies regarding environmental issues ("Directorate-General for Environment", 2016). The Directorate-General works under the political leadership of a Commissioner, who in turn has its own portfolio and responsibilities of which one or more of them are linked to certain DGs. The DGs prepare policy proposals for their Commissioner. In the College of Commissioners, these drafts can then be put forward for voting ("Institutions from the EU, n.d.). Each Commissioner or Vice-President has a team of cabinet members that advises him/her on specific topics in their own appointed portfolios. The role of the cabinet, the Commissioner's personal office, is to provide political guidance to the Commissioner or Vice-President. "The Commissioner's cabinets are seen as the real concentration of power in the European Commission" (Eppink, 2007: 50). This gives some context, which we can use to analyse with whom most of the meetings were held.

The distribution of meetings between stakeholders and policy-makers, according to hierarchy-level, is visualised below in figure 9 and figure 10 and described in table 10. Additionally, Integritywatch provides data about the most receptive 'hosts' in the Circular Economy Package. This is specified as individuals from the EC that have had the most contacts with lobbyists. When individuals meet several organisations in one meeting, this is registered as a separate contact. Therefore, the number of contacts can be higher than the number of meetings, according to Integritywatch. The most receptive hosts on the subject circular economy are listed in figure 11 and figure 12. They are good for a total of 312 meetings, involving 150 organisations and 626 lobbyists.

Figure 9: Distribution of meetings with corporate organisations

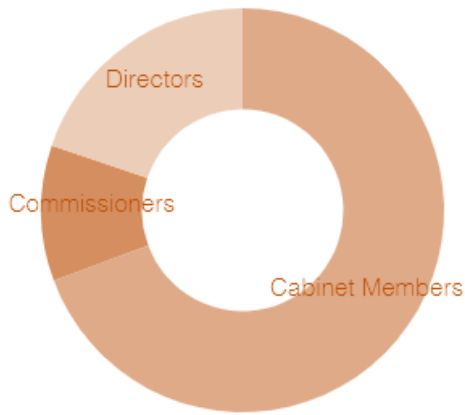
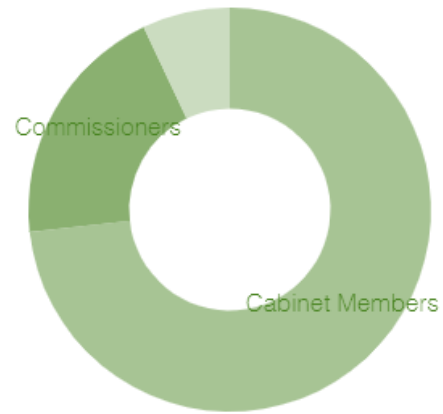


Figure 10: Distribution of meetings with NGOs



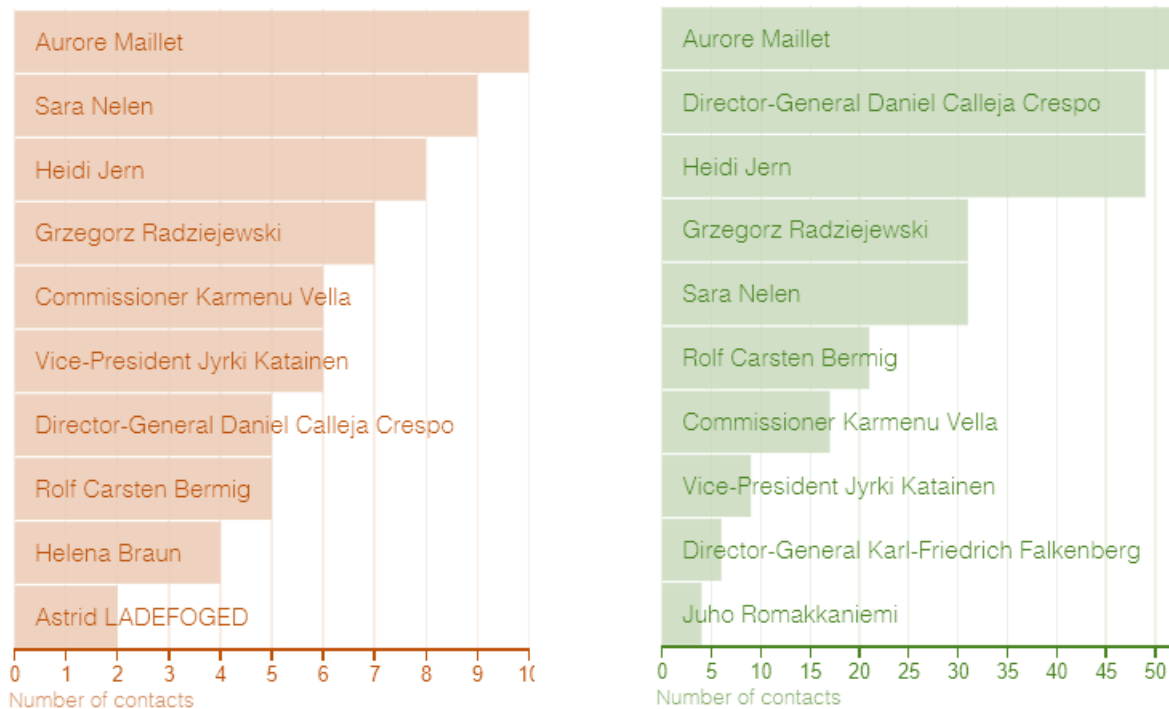
Source: Integritywatch

Table 10: Distribution of meetings with EC senior staff members, according to hierarchy level

	Corporate		Non-Governmental	
	Quantity	%	Quantity	%
Commissioners/VP	29	9,9	10	15,6
Directors	61	20,7	5	7,8
Cabinet members	204	69,4	49	76,6
Total	294	100	64	100

Source: Integritywatch

Figure 11: Top 10 hosts for corporate organisations Figure 12: Top 10 hosts for NGOs



Source: Integritywatch

According to figure 9 and 10, as well as table 10, we find that NGOs and corporate organisations relatively have the most meetings with cabinet members, compared to other senior staff members. Moreover, we find that the hosts for corporate organisations as well as NGOs are mostly the same (figure 11 and figure 12). Knowing this, we can analyse who these people are, what their hierarchy level is and which portfolios or responsibilities they have (table 11). In doing so, we get a better indication on how powerful these people are as a policy-maker in the Circular Economy Package. Consequently, we get more comprehensive insights on the access and ultimately the influence of stakeholders in this policy domain. It is remarkable to see that the cabinet members, known to be to the real concentration of power in the European Commission, are the most receptive for lobbyists. This means that the lobbyists of organisations know that these are the best channels through which they can exert influence on policies. Also, we find that Commissioners and directors have less meetings with stakeholders, since they only meet to discuss subjects in broad terms, like environment or energy, while cabinet members are more or less special advisors for the Commissioners on specific topics. They are therefore more receptive to stakeholders that want to discuss more details or exchange technical information on topics regarding circular economy policies.

Table 11: EC's most receptive senior staff member towards NGOs and corporate organisations on the subject circular economy.

Name	Hierarchy level	Portfolio/responsibilities
Aurore Maillet	Cabinet Member [Team Vella]	<ul style="list-style-type: none"> • Circular Economy and Green Growth • Sustainable production, products and consumption • Sustainable chemicals • Global sustainable development
Heidi Jern	Cabinet Member [team Katainen]	<ul style="list-style-type: none"> • Circular Economy • Energy Union and climate action • Environment • Transport
Daniel Crespo	Director-General <i>Falkenberg's successor since medio 2015</i>	Environment
Sara Nelen	Cabinet Member [team Timmermans]	<ul style="list-style-type: none"> • Regulation • Sustainable development
Grzegorz Radziejewski	Cabinet Member [team Katainen] <i>Jern's successor since start 2016</i>	<ul style="list-style-type: none"> • Circular Economy • Energy Union and climate action • Environment • Transport
Carsten Bermig	Cabinet Member/expert	<ul style="list-style-type: none"> • Industrial Transformation and Advanced Value Chains • Consumer, Environmental and Health Technologies • European Semester and national competitiveness policies
Karmenu Vella	Commissioner	Environment, maritime affairs and fisheries

Jyrki Katainen	Vice-President	Jobs, growth, investments and competitiveness
Karl-Friedrich Falkenberg	Director-General	Environment
Frans Timmermans	Vice-President	Better regulation, interinstitutional relations, rule of law and charter of fundamental rights
Helena Braun	Cabinet member [team Timmermans]	<ul style="list-style-type: none"> • Sustainable Development policy • Circular Economy Better regulation and: <ul style="list-style-type: none"> • Climate action • Environment
Juho Romakkaniemi	Cabinet Member [team Katainen]	<ul style="list-style-type: none"> • Overall management of the cabinet and communications strategy • Supervision of Vice-President's agenda • Senior management issues • Institutional relations
Astrid Ladefoged	Cabinet Member [team Vella]	Strategy, coordination and communication

Source: European Commission and Integritywatch

We find that Aurore Maillet, cabinet member under Commissioner Vella, has the highest number of contact with stakeholders, however skewed when we look at the ratio between corporate contacts and NGO contacts. Her portfolio covers all aspects of the circular economy and corresponding policies. She advises Commissioner Vella directly on circular economy, sustainable development, sustainable production and sustainable chemicals. This indicates that she is a powerful policy-maker on the issue and the lobbyists of the interest organisations seem to know this. Interesting to see however, is that Heidi Jern, cabinet member under Vice-President Katainen, holds a portfolio that to some extent share the same topics as those of

Aurore Maillet. These cabinet members are part of different cabinets, which in turn have different objectives. Consequently, they perceive issues surrounding circular economy from different angles. From the perspective of their Commissioner's portfolio: environment (Vella) or jobs, growth and investment (Katainen), in this case. In doing so, their advice and political guidance for their Commissioner or Vice-President will be shaped accordingly. The technical expertise and relevant information provided by stakeholders will be used by these cabinet members in a way that it serves their Commissioner's political objectives and naturally for realising effective policies on the topic.

Hence, these cabinet members mostly have portfolios that correspond with the issues surrounding environmental or sustainability issues, but approach these issues differently, since they serve their own portfolio and ultimately that of the Commissioner or Vice-President. Stakeholders also arrange meetings with Commissioners and Directors, but these numbers are much lower. Following up on the information from the interviews, this is not surprising. More abstract issues, like environment, climate or energy, are discussed with Commissioners and Directors. *"Sometimes, industries get together on a broad issue and then meet with Commissioners"* (interviewee A – corporate stakeholder). More specific topics and surrounding policies are considered to be better discussed with cabinet members. Additionally, cabinet members can receive technical information from stakeholders, which they can use to provide their Commissioner with political guidance on the topics in their portfolio.

Moreover, the only Directors that have had more than one meeting with stakeholders are the former and current Director-General Environment, respectively Falkenberg and Crespo. These Directors are in charge of drafting proposals that can be put up to vote in the College of Commissioners. They are therefore considered to be quite powerful in shaping policies in the circular economy domain. The data show that these Directors have had 60 meetings on the subject circular economy, involving 292 lobbyists, of which 260 deployed by corporate organisations and 32 by NGOs. Just 5 of those meetings were held with NGOs, contrary to 55 held with corporate organisations. These findings indicate once more that corporate organisation are more influential than NGOs on the circular economy issue, since these Director-Generals are responsible for drafting the proposals in the Circular Economy Package. Moreover, there were 6 meetings held with DG Falkenberg and 19 by his successor, DG Crespo, before the Circular Economy Package and its policy proposals were put forward in December 2015.

The fewest meetings were held with Commissioners and Vice-Presidents (table 10). Nonetheless, they were 235 lobbyists involved in these meetings. This is in line with the information from the interviews, since the person (A) stated that sometimes, industry representatives get together to arrange meetings with Commissioners to discuss certain subjects in broader lines. Consequently, these organisations are each represented by their lobbyists in these meetings, what could account for a higher number of lobbyists involved, regardless of the low number of meetings.

Table 12: Distribution of contacts from the most receptive hosts

Name policy-maker <i>(hierarchy level)</i>	Number of contacts: Corporate	Number of contacts: NGO	Total number of contacts
Aurore Maillet (<i>cm</i>)	52	8	60
Heidi Jern (<i>cm</i>)	47	8	55
Daniel Crespo (<i>dg</i>)	49	5	54
Sara Nelen (<i>cm</i>)	31	9	40
Grzegorz Radziejewski (<i>cm</i>)	27	7	34
Carsten Bermig (<i>cm</i>)	21	4	25
Karmenu Vella (<i>co</i>)	14	4	18
Jyrki Katainen (<i>vp</i>)	6	4	10
Karl-Friedrich Falkenberg (<i>dg</i>)	6	0	6
Frans Timmermans (<i>vp</i>)	3	2	5

Helena Braun (<i>cm</i>)	1	4	5
Juho Romakkaniemi (<i>cm</i>)	4	1	5
Astrid Ladefoged (<i>cm</i>)	1	1	2

4.3 Synthesis

We analysed the research results on every variable in this dissertation. Flowing from these findings, we reflect on our theoretical expectations and analyse what implications this has for the answer on our research question. Hence, we formulate a coherent answer on the influence of stakeholders, NGOs and corporate organisations in particular, on EC's Circular Economy Package and elaborate on mechanisms and relationships between the variables. In doing so, we also use information extracted from the conducted interviews with representatives of important stakeholders.

Realising a circular economy entails shifting from a linear economy model towards a circular economy model. This shift therefore touches upon every aspects of our lives. Consequently, the concept of circular economy and the policies that pursue to realise this concept ultimately affect every thinkable policy domain one way or another. Therefore, the way this Circular Economy Package is shaped, largely determines how future policies on this issue are shaped. The circular economy topic is therefore important for NGOs as well as corporate organisations. Naturally, we find a large number of interest organisations on this topic, when analysing the results of European Commission's open consultation on the issue. However, the scope of our research does not solely involve the number of interest organisations on the topic. In order to obtain comprehensive insights on the influence of stakeholders, we analysed how group type, resources and framing account or contribute to the influence of stakeholders, conceptualised as access to policy-makers. Flowing from our findings and analysis, we discuss the role of these factors. Also, we elaborate on influence as access to policy-makers in the light of our findings and ultimately, provide a synthesis on differences between NGO and corporate lobbying.

4.3.1 The role of group type

In line with our theoretical expectation, we find that group type accounts for influence. Corporate organisations have had more access to senior staff members of the European Commission on the subject than NGOs. We theorised that corporate organisations have economic power, while NGOs can rely on citizen support. These two factors are directly linked to the nature of these organisations and have shown to positively affect interest groups' influence (Klüver, 2012). The interviewees confirm the importance of these factors for their organisations in the lobbying process, since it contributes to their credibility in the eyes of the policy-makers. *“We have real people as members, which makes us an interesting for EU institutions. Not only do we set stakes and demand for policy making, we also communicate the right approach we want to take. In doing so, we rely on public support”* (interviewee B – NGO).

Furthermore, corporate organisations tend to find themselves in a defensive position while lobbying (Dür, 2015). Corporate organisations or business associations defend the status quo and therefore generally do not favour additional or stricter legislation. A striking example in which we find this, is the joint statement from 36 packaging value chain association on waste directives (CEPI, 2016). The rather defensive lobbying position corporate organisations hold on the topic, is translated into a large number of corporate interest organisations active on the circular economy issue. Corporate organisations, as well as industries pursue to secure their interests, which usually lie in the preservation of the status quo. A transition towards a circular economy ultimately asks for a significant change, that lies to far from the status quo. Realising a smooth transition however, with few negative implications for European industries, is desirable for both the EC as well as businesses. Also, in the light of organisations lobbying friends rather than foes (Berry, 1977), it seems that corporate organisations find more like-minded people in the EC than NGOs. Flowing from this, we argue that economic power seems to be a better means to influence the European Commission on the circular economy issue. NGOs on the other hand, tend to favour policy change or new legislations that contributes to their cause and objectives (Dür, 2015). Hence, the number of NGOs in this domain is relatively limited, because policy-makers seem to already know that NGOs – and their citizen support – generally favour enhanced policies on environment and sustainability. Compared to corporate organisations, NGOs have less diffuse interests and are therefore better able to voice their interests and ultimately need fewer meetings in order to be effective (interviewee B – NGO). Also, it is not unusual for corporate organisations to perform lobbying activities on an individual basis, next to the lobbying activities performed by their business associations or

industry platforms. This could also account for the vast number of corporate organisations in this policy domain, compared to the number of NGOs.

4.3.2 The role of resources

Furthermore, we find that a higher level of resources does not account for more influence. Based on our findings, there does not seem to be a direct relationship between the level of resources and influence or access to policy-makers, in this case. However, the importance of resources, in order to be effective in influencing policies, is underlined by the interviewees. *“Influence is always linked to financials and budgets. It is a precondition for successful workstreams”* (interviewee B - NGO). In order to set up high profile communications and follow and influence a policy process, resources are needed in the form of FTEs as well as budget that covers the expenses. Nonetheless, a higher level of resources does not necessarily mean that an organisation is more influential. *“An organisation can have all the resources, but still not succeed in lobbying”* (interviewee A – corporate stakeholder). The stakeholder representatives explained in the interviews that the quality of resources accounts for how effective an organisation is in their lobbying activities. Lobbyists with extensive skillsets, experience in Brussels and with its European institutions as well as personal connections are more likely to be successful. The languages they speak and their networking skills are also of considerable importance for lobbyists to be successful in influencing policies, according to the interviewees.

Organisations with more financial power however, are able to hire more experienced and skilled people, since they can offer higher salaries. Since corporate organisations tend to be financially more powerful than NGOs, this means that it is more likely that these experienced, skilled and connected lobbyists end up working for a corporate organisation rather than for an NGO. Nevertheless, people who are dedicated to a certain cause and are in a position to contribute to that cause using their professional abilities do not sway for a high salary and still end up lobbying for an NGO. NGOs tend not to pay high salaries, but are still able to find dedicated and skilled people that find cause more appealing than salary. Consequently, there is some nuance to be found in this statement. However, we do find that the 10 most influential corporate organisations seem to be way more effective in arranging meetings than the 10 most influential NGOs. These corporate organisations were able to arrange twice as much meetings with approximately the same number of lobbyists (in FTEs). Also, their estimated minimum lobby budgets only slightly differed with that of the NGOs. This comparison between the 10 most influential organisations of both group types indicate that the most influential corporate

organisations indeed are able to hire highly effective lobbyists compared to those of NGOs. According to interviewee B (NGO), NGOs sometimes complain about the lack of resources compared to corporate organisations.

4.3.3 The role of framing

We also theorised that framing is an integrated part of the lobbying process, and expected that frames will be adjusted throughout the policy process. The data from the interviews confirms that framing is indeed an integrated part of the lobbying process. This proves once more that lobbyists or interest groups are framers (Baumgartner, 2007: 486). Contrary to Klüver's (2015b) findings however, there is no sharp distinction between the employment of economic frames and public interest frames by respectively business groups (corporate organisations) and citizen groups (NGOs). Although interviewee B (NGO) mentioned that NGOs, in general, do not want to be associated with 'economic growth' as such, they do however employ economic frames, like 'job creation' and 'competitiveness'. This does however depend on the audience they want to address. Naturally, this particular NGO also employed public interest frames, like environmental frames. In addition, it is somehow remarkable that interviewee A (corporate stakeholder) says to employ environmental frames, like 'environmental protection'. The person's organisation does however emphasise economic aspects when meeting with policy-makers. Too strict circular economy policies, for example, could lead to the loss of certain industries in the European Union (interviewee A – corporate stakeholder).

Flowing from the interviews with stakeholder representatives, we find that frames are adjusted constantly, depending on the phase in the policy cycle, the person you meet with and the audience you want to address. In doing so, it also depends on what you want to achieve: focus attention, create support or shape specific aspects in policies. *"Some policy-makers understood circular economy still as a synonym for end-of-life-cycle and waste. We then framed it as new way of consuming and producing"* (interviewee B - NGO). Although it is very difficult to assess the link between the use of a particular frame and influence (also because frames are often adjusted), we do clarify that framing plays a key role. We can also carefully state that, with regard to the Circular Economy Package, both corporate organisations as NGOs use economic frames as well as public interest (environmental) frames when performing lobbying activities.

4.3.4 Influence as access to policy makers – the Circular Economy Package

According to the interviewees, meetings with policy-makers (which we consider a key form of access) are very important, in order to be influential as a stakeholder. On the one hand, because the European Commission consults with relevant stakeholders for democratic purposes, while on the other hand, it is important for stakeholders to voice their interests and policy preferences towards the European Commission. *“You identify keepers on your file and then send meeting requests, in which you explain what you want to discuss and in which context. Sometimes you get them, sometimes you do not”* (interviewee A – corporate stakeholder). Naturally, the importance of meetings with policy-makers, depends on the phase in the policy cycle. When certain topics are still in the agenda setting phase or drafting phase, the European Commission, and meetings with its staff members, play a key role. Meetings between stakeholders and EC staff members are mutually beneficial: *“The European Commission’s staff members are brilliant, but do not have a good view on legislation with regard to technical issues, a realistic time frame or possible consequences”* (interviewee A – corporate stakeholder). Consequently, meetings between stakeholders and policy-makers benefit stakeholders by being able to voice their interests and preferences, while simultaneously the policy-makers are able to improve their policy proposals according to the provided technical information and a more realistic view on how implementable these policies are. Interviewee B (NGO) explains that *“if the EC only goes for public consultation and large stakeholder conferences there remains a deficit. Interests remain rather abstract, because of the way questions in these open consultation are formulated. People who evaluate these consultation of large stakeholder conferences can basically write down whatever they want, because interests are still diffuse and nothing is concrete”*. Personal meetings with policy-makers are therefore important to specify interests as well as providing them with relevant, technical information which they can use for shaping their policies.

We already mentioned that the Circular Economy Package and its policies ultimately affect everyone, which makes this topic salient for a broad scope of stakeholders. This is translated into the number of interest organisations we find in the results of the European Commission’s open consultation. We narrowed down the lobbying stakeholders by focussing on the organisations that arranged meetings with the European Commission and find that 194 interest organisations have arranged meetings on the issue. Corporate organisations outnumber NGOs on this topic and consequently were able to arrange far more meetings with European Commission’s senior staff members on every hierarchy-level. Table 13 illustrates how many

corporate as well as NGO lobbyists are involved in meetings on the corresponding hierarchy-level. We find that the most meetings were held with cabinet members. The latter are perceived as “the real concentration of power in the European Commission” (Eppink, 2007: 50). Consequently, they are targeted the most by lobbyists. Cabinet members provide their Commissioner or Vice-President with political guidance on the topics in their portfolio. The DG Environment is ultimately responsible for drafting proposals surrounding the topic of circular economy, but does not have as much meetings with stakeholders as cabinet members. This is because when organisations meet with Directors or Commissioner, only the broader lines of the circular economy are discussed. Naturally, it is not efficient nor effective for Directors and Commissioners to repeatedly have meetings in which the broader lines of the Circular Economy Package are discussed, especially not when meeting these stakeholders separately. The interviewees also explain that organisations sometimes cooperate with other organisations to set up a meeting with a Commissioner or Director. Also, these meetings are more relevant and effective when the policies are in the drafting phase. Cabinet members on the other hand, lend themselves better to obtain technical information from stakeholders as well as hearing them out on their interests on specific issues. It is therefore not remarkable that the most meetings were held with cabinet members.

Table 13: Number of lobbyists involved in meetings between organisations and policy-makers, according to hierarchy level

	Corporate lobbyists involved	NGO lobbyists involved	Total lobbyists involved
Commissioner	166	69	235
Director-General	260	32	292
Cabinet member	285	92	377

“Lobbying in the end is a democratic process; a two-way channel for information. Technical information is much appreciated by policy-makers and in the end it is in everybody’s interest that there is legislation that is demanding, that pushes industries further, but have to be implementable at the same time”. This is a quote from interviewee A (corporate stakeholder) on lobbying in the Circular Economy Package. This person emphasises the mutual dependency between policy-makers and stakeholders. *“In meetings, you can answer questions from the European Commission and provide them with technical expertise”*. Additionally, the person explains that meetings with policy-makers are effective to establish relationships with them. These established relationships can in turn contribute in the process of influencing policies. *“It is useful and effective when policy-makers know who we are, what we represent and what our ideas of good policies are”* (interviewee B – NGO). Policy-makers can then ask to elaborate on certain issues or further explain positions and interests on these issues. Interviewee B (NGO) elaborates by saying that organisations have much higher influence if they are able to create relationships with the policy-makers, in which they perceive you as trustworthy and credible. This ties in with Klüver’s (2012: 73) findings: “lobbying can be conceptualised as an exchange relationship of interdependent actors”.

Ultimately, in order to influence policies, organisations have to establish relationships with policy-makers, which is possible by arranging meetings. There are hundreds of interest organisations active on circular economy policies, of which 194 organisations arranged meetings on the topic with European Commission’s senior staff members. These organisations were therefore able to establish relationships with relevant policy-makers involved the development of the Circular Economy Package. In these meetings and the contact that might or might not follow afterwards, relevant information can be exchanged, interests can be clarified and policy preferences can be discussed. A total of 394 meetings took place, involving 949 lobbyists. Besides a few exceptions, these meetings were held by the 13 senior staff members as listed in table 11. Approximately 75% of these meetings were held with corporate organisations, while 16% of these meetings were held with NGOs. The vast majority of these meetings took place on the hierarchy level of cabinet member. Naturally, these cabinet members all have portfolios that cover or touch upon aspects of circular economy. They provide political guidance to the Commissioners and Vice-Presidents they serve: Commissioner Vella, Vice-President Katainen and Vice-President Timmermans. Hence, circular economy seems to be scattered over all the policy areas these Commissioners are politically responsible for. Exerting significant influence on this policy domain is therefore quite challenging for stakeholders. This

comes with the fact that Juncker's agenda did not prioritise a circular economy or even environment (European Voice, 2014).

“The Juncker Commission was all about better regulation, which for a long time was a synonym for less legislation, in order to please EU sceptic people. The perception of policy-makers was that there was a reluctance on the EU as a whole. Therefore, The European Commission was cautious on new policy proposals”. This is a quote from interviewee B (NGO) when asked what impediments his organisation face when lobbying in the Circular Economy Package. The European Commission was initially also really careful with proposing new legislation surrounding circular economy. *“Once it was clear that the EC wanted a comprehensive package on circular economy, we pursued to arrange meetings with policy-makers high up in the hierarchy to discuss prime policies. When the package was out, we talked to lower ranks (technical staff) in the European Commission, trying to figure out what should be done at a European level”* (interviewee B – NGO). According to one of the interviewees (B – NGO), it is important to first meet with technical staff members. Once proposals reach the College of Commissioners to give them political approval, it is best to meet again with Commissioners or cabinet members. This is also the case for the Circular Economy Package. Unfortunately, our data do not account for meetings with EC's technical staff members, but only for senior staff members. Consequently, we are not able to provide a full image on the influence of stakeholders on the Circular Economy Package.

4.3.5 Differences between NGO and corporate lobbying

Nonetheless, we can elaborate on the difference between how NGOs and stakeholders differ in influencing the Circular Economy Package. We already discussed that corporate organisations are more likely able to hire experienced, skilled and connected lobbyists than NGOs. This could make them more effective in accessing policy-makers. Additionally, corporate organisations are able to allocate their resources adequately on specific issues, even if these issues are not salient. This could account for the high number of meetings, compared to that of NGOs. Contrary, NGOs have to raise funds to allocate their resources on salient issues, since they tend to work on multiple dossiers across policy areas. NGOs represent a common cause and therefore have more ambiguous objectives and interest on circular economy policies. However, NGOs are able to communicate coherent, concrete messages on where they stand on circular economy issues and therefore do not need more meetings in order to voice their interests. Nonetheless, the positions of NGOs on certain issues overlap to a large extent, which is why EC's policy-

makers do not have to meet with all of them separately. Yet NGOs are interesting stakeholders for policy-makers, since they rely on public support and communicate what the approach is they want to take on circular economy issue, rather than solving issues within the status quo. The latter also explains the differences between NGO and corporate lobbying on this issue. NGOs favour system change and enhanced environmental legislation, while corporate organisations prefer the status quo (Dür, 2015). When change is inevitable, they favour smooth, incremental changes during which they can secure their interests, rather than change the entire system at once. *“Circular economy is about system change, which is easier to communicate for NGOs than corporate organisations”* (interviewee B – NGO).

The latter (corporate organisations) operate within current frameworks and processes, while the circular economy is all about rearranging our entire economy and the processes and frameworks that come with it. Corporate organisations are therefore not able to communicate or promote such messages and the abrupt changes that come with it. Hence, corporate organisations have more unambiguous interests and can provide policy-makers with useful information on possible (negative) implications of policies. Economic power therefore seems to be a powerful means to influence the European Commission, in line with Klüver’s (2012) findings. Regardless of these corporate organisations want to realise a transition towards a circular economy or not, a smooth transition is necessary in order for them to secure their position in the market and adjust their processes and perhaps entire business models accordingly. As Rasmussen (2014) already stated: business is often divided and tend to fight itself. Corporate organisations have diffuse, yet specific interests when it comes to circular economy policies, while NGOs are more in sync on the topic. According to the interviews, policy-makers know this. Consequently, NGOs organise and coordinate their interests efficiently and therefore *“need one instead of five meetings”* (interviewee B – NGO). Businesses on the other hand, almost never go only through their business associations, but also want individual meetings. *“We have approved to arrange crucial meetings, but compared to what other stakeholders get, it is quite limited. This is because we are perceived as basically one (environmental) interest”* (interviewee B – NGO). In the end, no one doubts that NGOs support better legislation on environmental issues.

In the end however, interviewee A (corporate stakeholder) says that *“there is no big difference between NGO and corporate lobbying on this topic. There is even a lot of cooperation between the industry and NGOs. In the end, it is mainly about recycling, if you look at it. It is about how we can use waste in products. NGOs and businesses are not that different on where they stand on the subject of circular economy, but they do differ in what implications legislation will have on them”*.

All things considered, we find that it is still quite challenging to come up with concrete answers on the influence of stakeholders on European Commission’s Circular Economy Package. Moreover, it is equally challenging to come up with holistic answers on what accounts or positively affects influence of stakeholders. Flowing from our research results and analysis, we find that corporate organisations are by far the most influential stakeholders on circular economy policies. More specifically, they have more access to policy-makers on the issue. Nevertheless, we do not find that the level of resources accounts for interest organisation’s influence. The quality and allocation of resources seems to be more important. Lastly, we find that framing is an integrated part of the organisation’s lobbying activities and that these frames are adjusted constantly, depending on the policy phase, the audience and the objectives. We do however find that economic and public interest frames are used by both corporate organisations and NGOs on this issue, although NGOs prefer not to use ‘economic growth’-frames. Hence, our theoretical expectations about group type and framing are confirmed, contrary to our theoretical expectations about resources and how these account for stakeholder’s influence. However, there is some nuance to each of our findings. We will discuss the implications and limitations of our research in the last chapter, as well as recommendations for future research.

5. CONCLUSION AND DISCUSSION

5.1 Summary of the main findings

This dissertation pursued to gain more insights on NGO and corporate lobbying when researching their influence on the Circular Economy Package. Ultimately, the central question here was: *What is the influence of stakeholders on the Circular Economy Package?* With respect to the research question, we conceptualised stakeholders as interest groups and influence as access to policy-makers. We theorised that group type, resources and framing contribute to the influence of stakeholders. By conducting interviews with representatives of important stakeholders and extracting data from the Integritywatch and Lobbyfacts databases, this research' aim was to obtain a coherent image of the influence of stakeholders on circular economy policies by scrutinising the role of group type, resources and framing.

We find that corporate organisations indeed are more influential than NGOs, since they have had more access to policy-makers, meaning they have arranged more meetings with Directors, Commissioners and cabinet members on the subject circular economy. They outnumber NGOs on the topic. An explanation could be that corporate organisations are more diverse and hence have more diffuse interests, compared to NGOs. Consequently, these diffuse interests are translated into a large number of active corporate organisations on the topic. Hence, corporate organisations is are often divided and tend to fight themselves (Rasmussen, 2014). Additionally, corporate organisations tend to not lobby only via their business associations, but also on an individual basis (by lobbying directly themselves). This underlines the diverse interests of corporate organisations, contrary to the alignment of NGOs on the topic. They tend to take a somewhat similar position on enhanced environmental policies. EC's policy-makers seem to perceive the positions of NGOs on environmental topics are similar to a large extent, and are therefore perceived as one (environmental) interest. This makes it more challenging for NGOs to arrange more meetings. NGOs however, are able to communicate their interests effectively and in doing so, they can rely on citizen support. Furthermore, the nature of the circular economy debate is about a transition that asks for system change. Naturally, these are favoured by NGOs, which therefore find themselves in a offensive position on the issue. Corporate organisations however, tend to prefer a smooth transition during which they can secure their interests. They therefore hold a more defensive lobbying position on the issue. Moreover, a smooth transition, with minimised negative implications for European industries, is also desired by the European Commission, since it pursues to isolate significant negative economic

consequences of their policies. Flowing from this, we find that economic power seems to be a better means to influence the European Commission than citizen support. Also, organisations tend to rather lobby friends than foes (Berry, 1977), which indicates that corporate organisations find more like-minded people in the EC than NGOs. So we do find that corporate organisations are more influential, since they have gained more access. Nevertheless, we find that there are multiple explanations for the high number of meetings with corporate organisations, compared to NGOs.

Moreover, we find that there is not a clear relationship or mechanism between the level of resources and an organisation's influence. Also we find that NGOs and corporate organisations seem to be just as efficient with their resources. Although the interviewees endorsed the importance of resources, they emphasised that resources as such do not account for an organisation's influence. They argued that the skills, personal network and experience of an its lobbyists tend to be more decisive on how influential an organisation is. An organisation can have a lot of resources at its disposal, but could still fail in achieving their lobbying objectives, because the quality of their resources is insufficient. According to the interviewees, resources do not account for influence, but the characteristics and deployment of resources does play a critical role.

Furthermore, we emphasised the importance of framing and its contribution to the influence of interest groups. While we were not able to map and research this relationship extensively across stakeholders, we did gain insights from the interviews on this matter. Importantly, the interviewees emphasised that frames are adjusted constantly, depending on the policy phase, the audience and lobbying objectives. Interviewee B (NGO) illustrates this by referring to a factsheets they published in which they reframed circular economy as a new way of producing and consuming in order to get policy-makers to get a better understanding on the topic and at simultaneously clarify on its economic benefits. In their position paper on the other hand, they refer more to environmental benefits. Moreover, we find that the use of frames do not differ as much between corporate organisations and NGOs, since they both use public interest frames as economic frames when deploying lobbying activities. Information from the interviews tells us that NGOs do not use frames that refer to economic growth as such, but put more emphasis on competitiveness, sustainability and broadening the concept of waste (also including a waste of resources). All things considered, the frames used by NGOs do not seem to be that divergent from frames used by corporate organisations, although corporate organisations emphasise economic impact or possible negative consequences of too strict policies more strongly.

Hence, we can formulate a coherent answer to our research question: *What is the influence of stakeholders on European Commission's Circular Economy Package?* Stakeholders seem to be influential in terms of access to senior staff members of the European Commission. According to the data from our interviews however, meetings with policy-makers are effective to establish relationships. Once a relationship is established, it can contribute in the process of influencing policies. Hence, this gives a more nuanced perspective on the access of stakeholders to policy-makers.

A total of 394 meetings between stakeholders and EC senior staff took place on the subject of circular economy. Of the 744 organisations that contributed to the open consultation, 194 organisations proceeded by arranging a total of 394 meetings, involving 949 lobbyists. In line with our theoretical expectations, corporate organisations are found to be more influential than NGOs. Our theoretical expectation related to the role of resources on the other hand, is not confirmed. Lastly, corporate organisations and NGOs tend to use both economic frames as well as public interest frames on the issue. These frames are constantly adjusted, depending on the policy phase (and institution), the audience and objectives.

5.2 Limitations of the study

Reflecting on this dissertation, we would like to acknowledge some important limitations of our research. First, we discuss our methods and research design in the light of validity and reliability, followed by general remarks on this research' limitations.

Following our research design and methods, this dissertation can be considered reliable to a large extent, since the findings would be the same if this research would be conducted once more. The data from Integritywatch' interactive database are reliable to a large extent, because the data is extracted from European Commission's own reporting on meetings. Since it is relatively new for European Commission's senior staff members to rapport all meetings they have with stakeholders, it is nonetheless plausible that not (yet) all meetings are reported correctly and/or consistently. Each staff members is responsible for their own reporting on these meetings. Moreover, the data from extracted via Integritywatch, Lobbyfacts and ultimately the Transparency Register, regarding lobby budgets, FTEs and other information on organisations, are questionable. It is not (yet) mandatory for an organisation to register themselves in the Transparency Register. Nonetheless, this is a precondition when an organisation wants to meet with senior staff members of the European Commission (Integritywatch, n.d.). However, the information they put in the Transparency Register about their organisation with regard to their

resources are not being verified or can be changed over time. This means that the data we use for this research is reliable in a sense that when used a second time, in the same way, using the same time frame, it would yield the same results. However, the data from the Transparency Register, that is extracted by the Integritywatch and Lobbyfacts database, can be changed over time. Furthermore, the information used from the interviews can be interpreted or applied differently. Besides, interviews with other important stakeholders naturally provide other information than the conducted interviews for this dissertation.

Following up on reliability, we now reflect on the validity of the research. We first discuss the internal validity. With respect to how we define our concepts and the data we use to operationalise these concepts, we argue that this dissertation has internal validity. We conceptualised influence as access to policy-makers and operationalised this by analysing data on meetings between organisations and senior staff members of the European Commission. This does, however, not mean that access equals influence. Also, by solely analysing the access to senior policy-makers, we do not cover access to all European Commission's policy-makers. Nevertheless, following our clear conceptualisation and operationalisation of influence, we argue that this dissertation has a high internal validity.

When we critically reflect on our research, we cannot say that this research has a high external validity. We did not perform a large-N study and also did not use statistical tools like SPSS, also we rely on only a few interviews. It should be noted however, that we pursued to arrange interviews with a series of important stakeholders, but unfortunately did not succeed in realising all of them. Some of them did not respond and others did not have time. All things considered, our findings cannot be generalised beyond this immediate study. This means that this dissertation does not have external validity. Nevertheless, we can rely on its internal validity, since the databases we used and the semi-structured way we conducted our interviews, provide genuine findings on our research topic.

All things considered, our central concept, influence, is highly abstract and it seems that there is not yet an agreed upon definition that researchers can work with. However, there are workable definitions that touch upon the concept of influence, but seem to be opaque and sometimes circumstantial, such as the overlap between texts in positions papers and policy proposals. We thus chose for the definition of influence as access to policy-makers, although this does not mean that access is equal to influence. By conceptualising influence only as access, we also leave out other channels that could contribute to the influence of stakeholders, like the use

(social) media channels. Influence is exerted during the entire policy process, on multiple levels and in a constantly changing environment, which is why access to policy-makers only touches upon a small aspect of influence and the channels through which it is exerted. The complexity of influence is perhaps why it is considered the holy grail among interest group studies (Leech, 2010: 534).

However, influence as access seemed to be a workable definition, since the European institutions intended to pursue more transparency with regard to the policy making process and the contribution of lobbying. The European Commission, for instance, intended to be more transparent by publishing meetings they have with organisations. The EC says to only meet with organisations that are registered in the Transparency Register. Unfortunately, we cannot check this. Access seemed to be a valid proxy for assessing influence, as this is an approach that was also applied in previous interest group research (Bouwen, 2002) and it is feasible in terms of data collections, as information about actual meetings is publicly available. These registered meetings indicate at least the possibility for direct influence on policy-makers, although access does not necessarily imply influence. Moreover, the registered meetings only concern senior staff members of the European Commission, while stake holders not only meet with senior staff members, but also technical staff or lower staff in general, in order to exert influence. These meetings are not registered and could therefore not be analysed. According to our interviewees, these meetings are also important. Additionally, informal meetings, access via personal networks, as well as online access (e-mail) and other channels of communication are forms of access that we do not take into account in this dissertation. Here, we limited our focus to one particular channel of access. Moreover, we focus our research only on access to the European Commission, while the European Parliament and Council also have a say in the policy process. The access to these European institutions has not been taken into account.

Besides, analysing only the number of meetings organisations have had with policy-makers is perhaps not an appropriate way to measure influence as access. Organisations that effectively articulate their preferences and interests to the policy-makers they meet with, do not necessarily need more meetings when they conclude that policies are moving their way. Less meetings therefore, could indicate quite the opposite: more influence. Contrary, more meetings could indicate that organisations are not able to communicate their interests in such a way that policies are shaped accordingly. They tend to arrange more meetings with (other) policy-makers in order to achieve this still. Therefore, more meetings with policy-makers could also indicate ineffective lobbying and ultimately indicate less influence, instead of more.

Also, when we talk about the influence of interest groups, we talk about lobbying. The ultimate goal of lobbying is to persuade (influence) policy-makers to shape policies in the favour of the lobbying party. This persuasion process, this process of changing minds, is what lobbying actually pursues to do. Lobbying and ultimately, the process of changing minds (influencing), is therefore psychological; it relates to the human psyche. In the end, we do not know what is going on in the minds of policy-makers and hence, we also do not know if a decision one makes is the result of an organisation's lobbying efforts. Ultimately, lobbying is the process of human minds influencing human minds. Consequently, having access to policy-makers is one thing. But to influence these policy-makers in such a way that it suits one's lobbying objectives, is another. We thus cannot know whether access also leads to influence.

5.3 Recommendations for future research

Flowing from the results of our research, we can put forward some recommendations for future research. We suggest future research to investigate the quality and deployment of interest organisation's resources. More specifically, their lobbyists. The interviewees emphasised that it is important for a lobbyist to have a certain skillset, speak multiple languages and have experience working in Brussels in order to achieve lobbying objectives. Also, their personal network as well as 'knowing the way around Brussels' seem to be of importance, in order to be influential as a lobbyist and ultimately to be successful in influencing policies that favour his/her organisation. Future research could therefore elaborate on what qualities or competences are important for lobbyists to be successful in achieving the organisation's lobbying objectives. Hence, future research can also scrutinise the relationship between organisation's financial resources and how this relates to the quality and dedication of their lobbyists. In doing so, we can generate more inclusive and comprehensive insights on the role of resources and how this relates to achieving lobbying objectives.

Furthermore, future research can elaborate on our findings with regard to framing. NGOs as well as corporate organisations tend to use economic frames as well as public interest frames on circular economy issues. More systematic, large-n studies could clarify how NGOs and corporate organisations choose their frames when addressing a certain audience. Also, future research can elaborate on how framing is adjusted across policy phases in the policy cycle. Furthermore, it can investigate to what extent organisations use different frames for different European institutions on the same issue, or even the same frame across different issues.

Lastly, future research can provide further insights on the differences between NGO lobbying and corporate lobbying by analysing to what extent corporate organisations are ‘defensive’ and NGOs are ‘offensive’ when lobbying. Previous research finds that business groups tend to defend the status quo, while NGOs favour change. This research found this as a possible explanation for the high number of meetings arranged by corporate organisations, compared to NGOs. Corporate organisations have diffuse interests, while NGOs tend to be more aligned on environmental issues. Future research can investigate to what extent corporate organisations are found to have ‘defensive’ lobbying objectives and strategies, by analysing position papers or open consultation results. On the other hand, it is also interesting to research to what extent NGOs are found to have more ‘offensive’ objectives and strategies. A systematic, large-n study could provide important contributions on this topic and provide additional insights on NGO and corporate lobbying.

REFERENCE LIST

- Austen-Smith, D. and Wright, J. R. (1994). Counteractive Lobbying, *American Journal of Political Science*, 38(1), 25–44.
- Austen-Smith, D. (1993). Information and influence: lobbying for agendas and votes. *American Journal of Political Science*, 34(3), 799–833.
- Barnard, C. and Peers, S. (2014). *European Union Law*. Oxford, United Kingdom: Oxford University Press
- Berry, J.M. (1977). *Lobbying for the people: the political behavior of public interest groups*. Princeton, NJ: Princeton University Press.
- Biliouri, D. (1999). Environmental NGOs in Brussels: How powerful are their lobbying activities? *Environmental Politics*, 8(2), 173-182.
- Bouwen, P. (2002). Corporate lobbying in the European Union: the logic of access, *Journal of European Public Policy*, 9(3), 365-390. doi: 10.1080/13501760210138796
- Broscheid, A. and Coen, D. (2003). Insider and Outsider Lobbying of the European Commission. *European Union Politics*, 4(2), 165-189.
- Bruycker, de I. (2016). Framing and advocacy: a research agenda for interest group studies. *Journal of European Public Policy*, 24(5), 775-787.
- Chalmers, A.W. (2011). Interests, Influence and Information: Comparing the Influence of Interest Groups in the European Union. *Journal of European Integration*, 33(4), 471-486. <http://dx.doi.org.ezproxy.leidenuniv.nl:2048/10.1080/07036337.2011.579751>
- Dewulf, A. (2009). Disentangling approaches to framing in conflict and negotiation research: a meta-paradigmatic perspective. *Human relations*, 62(2), 155–93
- Druckman, J.N. (2004). Political preference formation: competition, deliberation, and the (ir) relevance of framing effects, *American Political Science Review*, 98(4): 671–86
- Dür, A. (2008a). Interest Groups in the European Union: How Powerful Are They? *West European Politics*, 31(6), 1212-1230. <http://dx.doi.org/10.1080/01402380802372662>

- Dür, A. (2008b). Measuring Interest Group Influence in the EU: A Note on Methodology. *European Union Politics*, 9(4), 559-576.
- Dür, A., Bernhagen, P. and Marshall, D. (2015). Interest Group Success in the European Union: When (and why) does business lose? *Comparative Political Studies*, 48(8), 951-983.
- Eising, R. (2007). Institutional Context, Organizational Resources and Strategic Choices: Explaining Interest Group Access in the European Union. *European Union Politics*, 8(3), 329-362.
- Entman, R.M. (1993). Framing: toward clarification of a fractured paradigm. *Journal of communication*, 43(4), 51–58.
- Eppink, D. (2007). *Life of a European Mandarin: Inside the Commission*. Ian Connerty (trans.) (1st ed.). Tielt, Belgium: Lannoo.
- Grossman, E. (2004). Bringing Politics Back In: Rethinking the Role of Economic Interest Groups in European Integration. *Journal of European Public Policy*, 11(4): 637–654.
- Hansen, J. M. (1991). *Gaining Access: Congress and the Farm Lobby*. Chicago: The University of Chicago Press.
- Healy, J. (2011). *Global Food Crisis*. Thirroul, Australia: The Spinney Press
- Jurgilevich, A., Birge, T., Kentala-Lehtonen, J., Korhonen-Kurki, K., Pietikäinen, J., Saikku, L. and Schösler, H. (2016). Transition towards a circular economy in the food system. *Sustainability*, 8(1), 69-81
- Klüver, H. (2011). The contextual nature of lobbying: Explaining lobbying success in the European Union. *European Union Politics*, 12(4), 483-506
- Klüver, H. (2012). Lobbying as a collective enterprise: winners and losers of policy formulation in the European Union. *Journal of European Public Policy*, 20(1), 59-76. <http://dx.doi.org/10.1080/13501763.2012.699661>
- Klüver, H. and Mahoney, C. (2015a). Measuring interest group framing strategies in public policy debates, *Journal of Public Policy*, 35(2), 223–44.

- Klüver, H., Mahoney, C. and Opper, M. (2015b). Framing in context: how interest groups employ framing to lobby the European Commission. *Journal of European Public Policy*, 22(4), 481-498. doi: 10.1080/13501763.2015.1008550
- Lazarevic, D. and Valve, H. (2017). Narrating expectations for the circular economy: Towards a common and contested European transition. *Energy Research & Social Science*, 31(3), 60-69
- Leech, B. (2010). Lobbying and influence', in S. Maisel, J. Berry and G. Edwards III(eds), *The Oxford handbook of American political parties and interest groups*, Oxford: Oxford University Press, 568-87.
- Michalowitz, I. (2007). What determines influence? Assessing conditions for decision-making influence of interest groups in the EU. *Journal of European Public Policy*, 14(1), 132-151.
- Michelini, G., Moraes, R. N., Cunha, R. N., Costa, J. M. H., and Ometto, A. R. (2017). From Linear to Circular Economy: PSS Conducting the Transition. *Procedia CIRP*, 64(3), 2-6
- Nagel, J. H. (1975). *The Descriptive Analysis of Power*. New Haven, CT: Yale University Press.
- Rasmussen, M. K. (2014). The battle for influence: The politics of business lobbying in the European Parliament. *Journal of Common Market Studies*, 53(2), 1-18. doi: 10.1111/jcms.12156
- Rockström, J., Falkenmark, M. Lannerstad, M. and Karlberg, L. (2012). The planetary water drama: Dual task of feeding humanity and curbing climate change. *Geophysical Research Letters*, 39(15), 1-8
- Tanasescu, I. (2009). *The European Commission and interest groups: Towards a deliberative stakeholder involvement in the EU policy-making process*. Brussels: VUBPRESS Brussels University Press.
- Weber, M. (1980) [1921]. *Wirtschaft und Gesellschaft* (5th edition), Tübingen: Mohr
- Werker, E. and Ahmed, F. Z. (2008). What Do Nongovernmental Organisations Do? *Journal of Economic Perspectives*, 22(2), 73-92
- Woll, C. (2007). Leading the Dance? Power and Political Resources of Business Lobbyists. *Journal of Public Policy*, 27(1), 57-78. <https://doi.org/10.1017/S0143814X07000633>

LIST OF SOURCES

ACE – Alliance for beverage Cartons and the Environment (2016, 18 February). *European Circular Economy – making it work*. Retrieved from: <http://www.ace.be/publications/download/124/document/ace-position-paper-on-the-circular-economy-proposal-18-february-2016.pdf>

Better regulation: why and how. (n.d.) Retrieved from: https://ec.europa.eu/info/law/law-making-process/better-regulation-why-and-how_en

BEUC (2017). BEUC view on how to detoxify the green economy. Retrieved from: <http://www.beuc.eu/press-media/news-events/beuc-view-how-detoxify-green-economy>

Circular Economy (n.d.). Retrieved from: http://ec.europa.eu/environment/circular-economy/index_en.htm (visited on 27 September 2017).

CEPI (2016, 10 August). *Joint Statement from 36 Packaging Value Chain associations on the legislative review amending the Waste Framework Directive and Packaging and Packaging Waste Directive*. Retrieved from: http://www.cepi.org/system/files/public/documents/positionpapers/circulareconomy/2016/Single-Use_Packaging_2016.pdf

Dijl, van M. (2015, 3 december). Hoe Frans Timmermans het Europese bedrijfsleven tevredenstelt. *De Correspondent*. Geraadpleegd van: <https://decorrespondent.nl/3713/hoefrans-timmermans-het-europese-bedrijfsleven-tevredenstelt/171295542-0eadfcbb>

Directorate-General for Environment (2016). Retrieved from: http://ec.europa.eu/dgs/environment/index_en.htm

European Environmental Bureau (2016a, 12 April). *8 factsheets on how the European Union can get the circular economy right*. Retrieved from: <http://eeb.org/publications/81/circular-economy/2304/8-factsheets-on-how-the-eu-can-get-the-circular-economy-right.pdf>

European Environmental Bureau (2016b, 5 April). *EEB position paper on the EU Circular Economy Package*. Retrieved from: <http://eeb.org/publications/81/circular-economy/2306/eeb-position-paper-on-the-circular-economy-package-2.pdf>

European Voice (2014, 20 November). Juncker's ten priorities. *Politico EU*. Retrieved from: <https://www.politico.eu/article/junckers-ten-priorities/>

Folger, J. (n.d.). What is an NGO? Retrieved from: <https://www.investopedia.com/ask/answers/13/what-is-non-government-organization.asp>

From a linear to a circular economy (n.d.). Retrieved from: <https://www.government.nl/topics/circular-economy/from-a-linear-to-a-circular-economy> (visited on 26 september 2017).

Institutions from the EU (n.d.). Retrieved from: https://web.archive.org/web/20070623104055/http://europa.eu/institutions/inst/comm/index_en.htm

Integritywatch.eu (n.d.). “About”. Retrieved from: <http://www.integritywatch.eu/about.html>

INTEREURO (n.d.). About. Current efforts. Retrieved from: <http://www.intereuro.eu/public/>

Juncker, J. (2014). Communication from the president to the commission. The working methods of the European Commission 2014-2019. Retrieved from: <http://ec.europa.eu/transparency/regdoc/rep/3/2014/EN/3-2014-9004-EN-F1-1.Pdf>

Lobbyfacts.eu (n.d.). “About Lobbyfacts”. Retrieved from: <https://lobbyfacts.eu/about-lobbyfacts>

Traynor, I. (2014, 8 May). 30,000 lobbyists and counting: is Brussels under corporate sway? *The Guardian*. Retrieved from: <https://www.theguardian.com/world/2014/may/08/lobbyists-european-parliament-brussels-corporate>

Water scarcity (n.d.). Retrieved from: <https://www.worldwildlife.org/threats/water-scarcity> (visited on 26 September 2017).

CONSULTED DATABASES

- Integritywatch – <http://www.integritywatch.eu/>
- LobbyFacts – <https://lobbyfacts.eu/>
- Transparency Register – <http://ec.europa.eu/transparencyregister/public/homePage.do>

APPENDICES

Appendix A: Information about the interviewees

Both of the interviewees are representatives of important interest organisations (stakeholders) on circular economy policies. The interviewees were promised anonymity.

- *Interviewee A* is the regulatory affairs manager of an active lobbying corporate organisation, registered as such in the Transparency Register.
- *Interviewee B* is the senior policy officer: product policy and resource conservation of an active lobbying NGO, registered as such in the Transparency Register.

The outline of the interview questions can be found in appendix B. Appendix C (transcript interview A) and appendix D (transcript interview B) are available on request.

Appendix B: Interview script/outline of the interview questions

Semi-structured interview guide for interest group representatives

Introduction - Semi-structured interview

- Presentation of my research
- I am interested in understanding how [name organisation] has sought to influence the European Commission on the Circular Economy Package. *More specifically, I am interested in the role of resources, framing and the importance of meetings with EC staff.*
- Anonymity – you will be described as an important NGO/corporate stakeholder
- Ask for permission to record the interview

Importance of the package/policy proposals

- How important is the Circular Economy Package for [name organisation] compared to other issues you are currently working on?

Resources

- How many people within your organisation have been working on the case? (resources)
- What were their specific tasks/role?

Lobbying strategies

- Could you tell me a bit about how your organisation has sought to influence the European Commission regarding the Circular Economy Package and its policy proposals? I can see you published (a) policy paper(s), for example.
- I would like to obtain more insight into your lobbying strategies, in particular:
 - Your specific policy preferences on this package, and the extent to which they aligned with the position of the EC.
 - The importance of resources
 - The importance of framing.
 - The importance and role of (frequent) meetings with the EC.

Framing – [general definition framing: *emphasising certain aspects, while ignoring other in order to shape policies that favour your interests*]

- To what extent did the [name organisation] employed framing? Deliberately? - Why?
 - With regard to your position paper(s)?
 - With regard to meetings with policy-makers, more specifically: staff members of the European Commission? Did you adjust these frames before meeting them?
- Using only one or two words for each/the employed frame, how would you name it/them? (E.g. “sustainability” or “job creation”)
- Did the [name organisation] adjusted their frames during the lobbying process?

Meetings

- To what extent are/were meetings with staff members of the European Commission important in order to influence the Circular Economy policy proposals?

General questions

- What factors (do) account for the influence of a lobby group?
- What impediments do you face when lobbying the European Commission?
- What does it take to lobby the European Commission successfully?
- Is there something you would like to share or add on the issue that we have not yet discussed?

Appendix C: Transcript interview A

Full transcript available on request.

Appendix D: Transcript interview B

Full transcript available on request.