



DANISH INTERESTS IN THE EU

*Lobbying Energy Directives Through the
European Commission*

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Master's Thesis

MSc International Business & Politics

Copenhagen Business School

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Contract no.: 23285

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Date of submission: May 16th, 2022

STU count: 181,923

Page count: 80

Abstract

Lobbyism is an integral part of the European Union's policymaking process. Worldwide interest representations attempt to influence the legislation to benefit their interests. Danish interests are no exception. However, the study of Danish lobbying on EU policymaking exposes a gap in the literature, as this topic has not been thoroughly studied. This thesis seeks to address this gap. In doing so, two recently revised energy directives, the Renewable Energy Directive II and the Energy Efficiency Directive, are used as the scope for analysis for the lobbying efforts by Danish interests on the decision-making process within the European Commission. The analysis of lobbying strategies and the consecutive success of influence by Danish interests are done within a comprehensive theoretical framework. This framework consists of several different components of the existing lobbying literature that focus on specific parts of lobbying engagement and strategies. Hence, this thesis attempts to combine these elements to create a comprehensive explanation for Danish lobbying strategies and whether they enabled Danish interests to succeed in gaining influence.

The lobbying efforts are further put into the political context that the Danish interests operated in. This is done by the quantitative method Wordfish that is used to estimate the policy position of all interests on either of the two energy directives. Afterwards, a qualitative analysis is conducted using directed qualitative content analysis, which tests whether the components of the theoretical framework give a comprehensive analysis of the strategies used by Danish interest groups and companies. The thesis finds a number of factors that to varying degrees have influenced the Danish interests' strategies to succeed in influencing the directives to their benefit: A combination of specificity of recommendations, type, quantity, quality, and efficiency of the access good, the offered supply compared to the demand, type of interest representation, types of lobbying, provision of information, economic power, and citizen support, and lastly the participation in a lobbying coalition.

Keywords: Danish interests, Lobbying, Business interests, European Union, Lobbying strategies, Access Goods.

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List of Abbreviations

Abbreviation	Meaning	First Mentioned on Page
CCPI	Climate Change Performance Index	14
Danish Interest Representation	Danish Interest Organizations and Companies	14
DE	Danish Energy	11
DG	The Directorate-General	52
DI	Confederation of Danish Industry	11
DQLCA	Directed Qualitative Content Analysis	22
EED	Energy Efficiency Directive	6
EGD	The European Green Deal	13
EK	Expert Knowledge	16
ETS	The Emission Trading System/Scheme	53
GHG	Green House Gas	14
IDEI	Information Domestic Encompassing Interests	16
IEEI	Information on European Encompassing Interests	16
IIA	Inception Impact Assessment	37
MS	Member States	11
REDII	The Renewable Energy Directive II	6
TEU	Treaty on the European Union	12
The Commission	The European Commission	6
The Council	The Council of the European Union	7
The Parliament	The European Parliament	6

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1. Introduction

“Today is the start of a journey. This is Europe’s ‘man on the moon’ moment” the President of the European Commission (the Commission) Ursula von der Leyen stated in 2019, on the day when she presented the most ambitious package in the world in the battle against climate change: The European Green Deal (von der Leyen, 2019). In the following years, the has Commission worked on policies to realize the key target of the Deal: Being the first continent to reach climate neutrality by 2050. One of the main focuses was on the revision of the Renewable Energy Directive II (REDII) and the Energy Efficiency Directive (EED) as key components in reaching the target. However, “policymaking” in the EU cannot be mentioned without following it up with “lobbying”. Lobbying is an important part of the legislative process, as it contributes the views of specific groups in the public or of business interests within an industry. Lobbying efforts on the revision of these two directives are no exception. But how and why can interest groups influence the legislative policymaking? Can all groups, regardless of resources, interest, and country of origin contribute to the legislation shaped by the Commission? How much does the political context impact the potential of influence? These are some of the questions that this thesis explores through a case-study of the influence on the Commission obtained by Danish interests on the two energy directives.

Interest groups engage in lobbying to ensure influence on policies that impact the members they represent (Dionigi, 2017). However, as the concepts of lobbyism and influence are intangible, they are important to define. Both concepts have been widely defined by different actors. The Commission have together with the European Parliament (the Parliament) defined lobbyism in an EU context as “*all activities (...) carried out with the objective of directly or indirectly influencing the formulation or implementation of policy and the decision-making processes of the EU institutions.*” (European Union, 2014, article 7). Another important element is influence, which can be defined as “the achievement of interest groups’ goal in decision-making, which is caused by interest groups’ own intervention (lobbying activity) and/or MEP’s anticipation of them” (Dionigi, 2017, p. 6). These definitions are the basis of what this thesis will examine. The EU’s definition takes the institutional context into account and how this influence can be obtained, providing an understanding of what the EU defines as lobbying and influence. Dionigi’s definition adds the interest groups’ point of view by considering what their end goal is. Hence, this thesis will use and combine both definitions, as the former is more

general in defining lobbying and the latter is used to explain influence by interests. The latter part will, however, concern the influence exerted on the EU Commission and not on the Parliament.

2. Literature Review

As the literature on lobbying in the EU policymaking process is extensive, the following review of the literature will be conducted to get an overview of the literature relevant for this thesis. In the existing literature, it is evident that the research on lobbying efforts in the EU has been thoroughly studied in terms of lobbying and the influence of interest groups in the EU (Woll, 2006). Hence, given the thesis' focus on influence by Danish interests on the Commission, the literature can be split into two overall branches of lobbying studies in the EU. Firstly, the thesis will review literature that focuses on lobbying in the institutional context on a macro level (2.1). Secondly, the literature on the meso level will be reviewed, pertaining to the difference between the lobbying strategies of interest groups and business interests (2.2). Lastly, the apparent gap within the lobbying literature concerning the lobbying efforts by Danish business interests will be identified, and this thesis' contribution to the existing literature will be presented (2.3).

2.1 Lobbying in the Institutional Context

Reviewing the existing literature that studies the institutional context is relevant to develop a theoretical framework that takes appropriate components into account. The institutional context can be divided into three sub-sections concerning lobbying efforts in the EU's division of power, i.e., in the Commission, the Parliament, and the Council of the EU (the Council). This is because lobbying strategies will differ depending on which of the EU institutions the interest wants to lobby (Fink-Hafner, Hafner-Fink, Novak, Rozbicka, & Eising, 2015). A large part of this literature focuses on lobbying in the institutional context of the Commission. Bouwen (2009) argues that institutional change has impacted the lobbying behavior and strategy of private interests, as the European Parliament has been empowered in the legislative procedure. This has led to the Commission gaining more responsibilities regarding competencies and securing a geographical scope, which in turn has increased the Commission's dependency on the resources and information provided by private interests. Hence, this indicates that information is key when trying to gain influence on the Commission. Likewise, Coen (2007) argues that due to the institutional change in the EU, private and public interests are becoming more sophisticated in their strategic behavior. Binderkrantz, Blom-

Hansen, & Senninger (2021) have instead taken a different approach and studied how the Commission through selection of the most appropriate consultation type can counteract the influence of business.

Shortly turning to lobbying in the European Parliament, Dionigi (formerly Rasmussen) has conducted several studies on how interest groups and business lobbyists in the Parliament can exert influence that shapes the policy outcome (Rasmussen, 2011; Rasmussen, 2012; Dionigi, 2014; Dionigi, 2017). Few studies have been made on lobbying the Council, as most scholars generally agree that it is hard for lobbyists to gain access to the Council (Coen & Richardson, 2009). It is more at the national level, e.g., through national experts and national governance that influence can be exerted on the Council (Farrand, 2015). However, some scholars, such as Hayes-Renshaw (2009) argue that it is difficult but not impossible for lobbyists to access the Council. Instead, the lobbyists should take measures of both indirect and direct lobbying as well as doing it as early in the decision-making process as possible to achieve influence through the Council.

Additionally, this branch of the literature has also developed a new line of thinking, where the institutional context is considered in relation to the multilevel system of the EU institutions. Here, the concept of political opportunity structures has been developed, which describes the characteristics of an institution that decides how much interest groups can influence the policymaking (McAdam, Tarrow, & Tilly, 2001). For instance, studies have used the concept when considering the behavior of interest groups (Princen & Kerremans, 2008). These structures can both be exogenous, constraining the behavior of the interest groups (Cram, 2001), or endogenous, encouraging interest groups to participate in the political processes (Sheppard & MacMaster, 2004). The concept fits well into the resource exchange theoretical perspective on EU interest representation, as there is a level of interdependence between the institutions and the interest groups made evident in the structures (Greenwood, 2003).

2.2 Interest Groups vs. Business Lobbying

As the former part of the literature review has examined how lobbying differs within the institutional context, this part now turns to how lobbying efforts differ depending on the type of interest. This is relevant to examine, as the Commission has several different types of interests, and just as many ways of exerting lobbying. Hence, this builds the foundation for understanding what is relevant to consider when examining the lobbying efforts of Danish interests. In the early days of the study of EU lobbying,

most scholars wanted to map the European lobbying landscape because of the dramatic increase in lobbying activities in Brussels in the 1980s (Butt Philip, 1985). These studies generally relied on case studies on interest coalitions (Greenwood, Grote, & Ronit, 1992), corporate lobbying (Coen, 1998), or lobbying in different policy areas (Pedler & Van Schendelen, 1994). The focus on different actors in different policy domains increased during the 1990s, with several case studies of lobbying in the EU (Jordan, McLaughlin, & Maloney, 1993). These studies had different focuses such as lobbying strategies (Gardner, 1991) or national interest group lobbying (Van Schendelen, National Public and Private EC Lobbying, 1994). From the early 2000s until today, the study of EU lobbyism has increasingly focused on business lobbying (Bouwen, 2002; Woll, 2009; Bernhagen & Mitchell, 2009; Dür & González, 2012; Dellis & Sondermann, 2017).

One of the prime scholars within the study of corporate lobbying is Coen (2007; Coen & Richardson, 2009; Coen, 2010; Coen, Katsaitis & Vannoni, 2021), who has made extensive studies on how business lobbying in the EU has developed the last five decades. In the study by Coen, Katsaitis, & Vannoni (2021) it is argued that the study of corporate lobbying can be tracked to the establishment of the European Economic Community in 1958, whereas scholars have been increasingly interested in business activities since the 1960s (Coen et al., 2021). From the 1960s until the 1990s there was an incremental increase of business lobbying in the EU (Ibid.). However, as Streeck & Schmitter (1991) as well as Coen & Richardson (2009) argue, the amount of business activities in the EU rose immensely in the 1990s due to the adoption of the Single European Act of 1986, which implemented the co-decision procedure and extended qualified majority voting into economic policy areas, incentivizing companies to exert influence early in the policymaking process. Since then, a number of Treaties have been adopted, such as the Treaty of Amsterdam and the Lisbon Treaty, which according to several scholars (Katz & Wessels, 1999; Lehmann, 2002; Eising et al., 2015; Coen & Vannoni, 2020; Coen et al., 2021) enabled greater possibility of access for businesses. This is because MEPs were empowered in the policymaking process, thus, businesses began asserting influence through MEPs, and specific information from businesses became an increasingly treasured good in the EU institutions (Eisinger, Rasch, & Rozbicka, 2015).

In recent studies on business lobbying, Klüver, Braun, & Beyers (2015) have outlined a new conceptual framework that identifies the contextual nature of interest group politics in EU. They found that the institutional context affects how much influence interest groups have in EU especially depending on

informational resources (Bernhagen, Dür, & Marshall, 2015), the policy position of the majority of interest groups (Beyers, De Bruycker, & Baller, 2015), and national embeddedness of the interest group (Binderkrantz & Rasmussen, 2015). Hanegraaff and Poletti (2021) have in their recent study examined the role of firms in the EU lobbying efforts and found that a vast increase in business lobbying in the EU over the past ten years has increased the political role of firms in the EU political system. Literature that focuses on the different lobbying strategies used by businesses and organizations in the institutional context is limited.

The second part of this branch of literature has emphasized the study of interest groups and their characteristics as well as how to successfully lobby the EU institutions, especially depending on the different types of interest groups. For instance, Dür & Mateo (2013) found that the success of inside or outside lobbying primarily depends on the type of interest group. Bouwen (2002) instead found that the level of access and success of the lobbying efforts is co-dependent on whether the interest group is national, European, or a corporation. Conversely, Klüver (2012) has found that the success of lobbying efforts has little to do with the type of interest group. Dionigi (2017) uses another logic, arguing that interest groups should make use of both formal and informal lobbying to be successful in their lobbying efforts. This part of the literature generally focuses on interest groups on different levels, i.e., the national, supranational, and transnational (Woll, 2006). A large part of the literature focuses on EU governance and Europeanization as theoretical approaches, with one focal point: That EU lobbying must be understood in the context of the institutions that the interest group try to influence (Eising, 2007b). This unfolds in studies that examine the type of actors who are able to influence EU policymaking (Michalowitz, 2004), how the use of different channels of representation can increase the success of lobbying (Eising, 2004), and understanding where in the policy process that lobbying efforts will be of most success (Crombez, 2002; Beyers, 2004).

2.3 Danish Interest Lobbyism

As it is now evident that 1) there are large differences on how to successfully lobby different EU institutions and 2) the success of lobbyism by different types of interests depends on various means, the review now turns to the literature that focuses on lobbying by Danish interests. It quickly becomes clear that this part of the literature is limited. There are only a few case studies of lobbyism in a Danish context. For instance, Binderkrantz & Rasmussen (2015) have studied the difference between influence on the national and EU level in EU lobbying, finding that embeddedness is an asset within

domestic decision-making, but group resources are more important at the EU level. Further, comparative studies have been conducted using Danish and British interest groups to compare pluralist and corporatist contexts (Binderkrantz & Pedersen, 2019), finding that different interest groups gain influence through different measures of lobbying. Nonetheless, literature that focus on Danish interests in EU lobbying remains limited. Rather, most literature on the Danish context regards lobbying within the Danish Parliament (Helgelund & Mose, 2013; Pedersen, 2013) or how Danish interest groups access political systems in general (Binderkrantz, Fisker, & Pedersen, 2016).

This presents a gap in the literature. Lobbyism within EU institutions and lobbying strategies by different types of interests have been studied thoroughly, but the amount of research on Danish interests is small by comparison. Very little of the existing literature focuses on the lobbying efforts of Danish interests in EU institutions. Even less literature exists on the lobbying efforts by different types of Danish interest representation. Further, literature on how Danish interests try to assert influence on the agenda-setting phase of the EU legislation, i.e., the Commission, is nearly impossible to find. Hence, this thesis will attempt to address this empirical gap in the literature by conducting a case-study of the role of Danish interests and how they attempt to influence the Commission. This is done by analyzing their efforts to influence the revision of the two energy directives, REDII and EED. These will be presented in the background section. This leads to the research question of the thesis, which is:

What strategies did Danish lobbyists within the Danish energy industry use to influence the Renewable Energy Directive and the Directive on Energy Efficiency and were they successful in having an influential effect for the benefit of the interests of the Danish energy industry?

The research question is addressed by analyzing the positions of two Danish interest organizations, The Confederation of Danish Industry (DI) and Danish Energy (DE), and two Danish corporations, Danfoss and VELUX. This is done to identify their strategies for gaining access to and influencing the Commission. The positions of these Danish interests are compared to the positions of lobbyists of other Member States (MS) to lay out the context that the Danish interests had to work under, i.e., whether most interest representations from other MS had the same position on the proposals. The Commission has been chosen as the institutional focus of analysis, as it is the most influential EU institution due to its position in the agenda-setting phase of EU policymaking, making it the most likely access point for interests to influence the policymaking (Coen, 2007). It is worth noting that the latest

revision of the two legislative acts have not been adopted as official legislation by the Parliament and the Council. However, as I am merely looking at the proposals by the Commission, it is not relevant that the legislation has not been finalized. Rather, the object of the thesis is to evaluate the success of Danish interests in influencing the legislative proposals by the Commission.

3. Background

The focus of the thesis as well as the thesis' contribution to the existing literature have now been presented as the analysis of the role of Danish interests on the Commission's decision-making. This section will present the background for the chosen topic of interest and why it is relevant to examine the influence by Danish interests in the context of energy policies. This is done in two sub-sections that present the evolution of lobbying (3.1) and how to lobby the European Green Deal (3.2).

3.1 The Evolution of Lobbyism

For years, lobbying has played an increasingly large role in politics worldwide (Dionigi, 2017).

Numerous countries continue to discuss the importance of transparency and integrity within lobbying but emphasize that lobbying can be beneficial for all parties (Bitonti, 2017). Lobbyism carries the risk of inserting undue influence and misbalancing competition, but it can also provide policymakers with valuable information and considerations as well as help stakeholders gain access and influence policies (OECD, 2013). Thus, when lobbying efforts increase, lobbying is not per se a negative aspect that should be dismissed or considered with worry. Rather, lobbying should be embraced with caution as it is a crucial part of the democratic process, allowing representation of citizens or groups within society (Bitonti, 2017).

EU institutions do in fact embrace interest groups and consider their activities to be of great value (Coen, 2007). The institutional demand for interest groups has been facilitated by the increased access to the Commission and the Parliament. For instance, the Treaty of Lisbon implemented several reforms in the Treaty on the European Union (TEU) that emphasize open decision-making, where both citizens and representatives are encouraged to participate (TEU, 2009, article 10(3) & 11). However, lobbying has been part of EU policymaking ever since the 1980s (Coen, 2007). In the 1990s, interest group activities increased immensely due to the rising transfer of regulatory powers from the MS to EU institutions, the introduction of the Single Market, and the qualified majority voting that followed (European Parliament, 2022). In recent years, there has been an unprecedented expansion of lobbying

interests in the EU, where the EU institutions are in touch with thousands of lobbyists daily and more than 12,000 interest representatives are registered in the Transparency Register (European Parliament & European Commission, 2021).

Even though lobbyism has implemented itself as a substantial part of the EU system in the last four decades, it has a much more extensive history in the American political system, dating all the way back to the 19th century (Maskel, 2007). It is perceived as a vital part of the American political system and the right to lobby is explicitly mentioned in the 1st Amendment of the US Constitution (Weiser, 2021). Lobbyism is used by the US government to get a sense of the public's interests, and the population use it to lobby for specific legislation (Ibid.). This has led to a large increase in lobbyism in the US ever since the 1970s, both in terms of the number of lobbyists, and the size of lobbying budgets (Ranalli, D'Angelo, & King, 2018). Simultaneously, regulatory measures have been made frequently in the last 80 years, and the US was the first OECD country to implement regulations on lobbying (OECD, 2014). Regulation on lobbyism in the EU is less formal than in the US (Sqapi, 2015). However, the amount of regulation has risen in coherence with the increase in lobbyism. The first regulation on lobbyism within EU institutions was implemented in 1996 as a pass system, where lobbyists had to register when entering the Parliament (Lobby Europe, 2022). Since then, several initiatives have been made such as the European Transparency Initiative in 2005, the European Commission Register of Interest Representatives in 2008, and the Inter-Institutional Agreement of the Joint Transparency Register in 2011, which was amended in 2014 with more explicit rules on financial activities. In 2014, regulation on Director-Generals to publish meetings with lobbyists was adopted, a new proposal to make a mandatory register of lobbying efforts in the EU institutions was discussed in 2018, and in 2019 MEPs strengthened the Rules of Procedure requiring rapporteurs, shadow rapporteurs, and committee chairs to list lobby meetings (Ibid.).

3.2 Lobbying the European Green Deal

In 2019, the EU adopted the European Green Deal (EGD), which is a strategy to make a sustainable transition of the EU economy. In the deal, the EU has set several ambitious targets such as becoming the first climate neutral continent by 2050 (European Commission, 2019a). The EGD is the first ambitious climate deal in the EU (KPMG, 2022), and several types of interest groups have lobbied the EGD to influence the result. This is interesting to examine as the EGD covers multiple policy areas within the EU and will affect society, the labor market, and businesses in all MS. Further, the EU has

opened the scene for interest groups, as these changes in the regulation also mean that policymakers may lose support from voters (Politico, 2021). Thus, it is interesting to examine how much interest groups have been able to influence the policymaking.

The most influential and important aspect of the EGD is ensuring a clean energy transition (European Commission, 2019b). As production and energy use in the EU accounts for more than 75 percent of the overall greenhouse gas (GHG) emissions, it is crucial to increase the use of renewable and clean energy to reach the climate neutrality target. The three key principles for a clean energy transition in the energy package are to: 1) ensure a secure and affordable EU energy supply, 2) develop a fully integrated, interconnected, and digitalized EU energy market, and 3) prioritize energy efficiency, improve energy performance, and develop a power sector based primarily on renewable sources (Ibid.). To achieve these three principles, the Commission initiated a revision of energy policies including REDII and the EED as part of the "Clean energy for all Europeans"-package in 2020 (Ibid.). The EED is stated to be one of the key objectives of the package, because energy savings are the fastest way to reduce emissions in a cost-efficient way (Ibid.), while the REDII is considered to be one of the key environmental achievements of the EU (European Union, 2022b). These two Directives are thus two of the most influential parts of the package. Hence, the focus is on the influence asserted by Danish interests on the Commission before they adopted the final legislative proposals of both directives on July 14th, 2021 (European Commission, 2021a).

This scope is interesting due to several reasons. Denmark is, with its approximately 5.8 million citizens, within the group of small MS (By population, Denmark is the 11th smallest MS out of 27) (European Union, 2022c). Thus, in theory, Danish interests should have limited influence on EU legislation (Panke, 2008). However, as Denmark is ranked the best-performing MS in EU on reducing climate change on the Climate Change Performance Index (CCPI, 2022), it is interesting to study whether this ranking implicitly enables the Danish interests to gain additional influence. Furthermore, there is consensus among Danish interests: They want to be a part of the solution towards more sustainability (Danish Energy, 2020). This is an interesting factor when analyzing the position of Danish organizations on the two energy Directives, as the question is if their positions reflect this. Lastly, the focus on Danish interest organizations and businesses (Danish interest representation) was chosen because it is interesting to examine whether the Danish interest organizations have used different strategies than Danish businesses to lobby the two Directives and find whether one strategy has been more successful

than other strategies to achieve influence on policymaking. When taking the above into account, the thesis contributes to the field of study in a number of ways. There has, to my knowledge, not yet been a study on the influence of Danish interests regarding the EGD and more specifically REDII and EED. Further, most studies have analyzed only the influence of a specific type of lobbying actor, by looking at how different interest organizations or businesses lobby the policymaking (Dür et al., 2015; Ozer & Alakent, 2013). Thus, this thesis will contribute to the literature by performing an extensive analysis on the use of lobbying strategies across different Danish interests.

4. Theoretical Framework

This section presents the theoretical framework of the assignment, which consists of four parts. First, the Theory of Access will be presented as the theoretical approach used to explore what strategies interests can use to gain access to the policymaking in the Commission (4.1 and 4.2). Afterwards, various lobbying strategies are presented as the theoretical foundation for how interest representations gain influence in EU decision-making in the Commission, which is followed by a theoretical perspective on measures of lobbying actions by different types of interest representation (4.3). Lastly, the framework consists of how to lobby the Commission in its institutional context (4.4). All of this will be summed up in figure 4.3 on how the different components are used for analysis.

4.1 Theory of Access

One of the most established scholars within business lobbyism is Bouwen (e.g., 2002; 2004; 2009). He developed the theory of access, which has its foundation from the exchange theory and resource dependency theory, where the two underlying assumptions of the theory comes from. First, the theory assumes that interaction between organizations is examined as exchanges, which originates from exchange theory (Bouwen, 2002). The second assumption is that organizations are interdependent, because they need resources from each other to survive, and this originates from resource dependency theory (Ibid.). Combining these two assumptions, the theory of access views the relation between corporations and EU institutions as exchange relations between two groups of interdependent organizations. The theory also contains elements of the more traditional divide in EU politics between pluralism and corporatism (Greenwood & Ronit, 1994). The theory's emphasis on the importance of information and the range of groups is taken from pluralism, which is combined with corporatism's focus on resource exchange and compliance (Bouwen, 2002).

The central concept of the theory is access goods, which is defined as information that is crucial for the functioning of the EU institutions (Bouwen, 2004, p. 340). Hence, access goods contain a form of specified information or knowledge useful in the decision-making process. These goods are exchanged from the interest groups to the EU institution in return for access to the institution. The more the institution can use the knowledge, the more access the interest group can gain (Bouwen, 2002). The access goods are divided into three types: 1) Expert Knowledge (EK), 2) Information about the European Encompassing Interest (IEEI), and 3) Information about the Domestic Encompassing Interest (IDEI) (Ibid.). EK is the expertise and technical know-how within the field in the private sector. This kind of knowledge and information is vital in political institutions and for decision makers to develop effective policies because political systems in general do not have enough technical knowledge (ibid.) The need for EK in policymaking is, thus, acknowledged in the literature (e.g., Van Shcendelen, 1994; Buholzer, 1998). Individual companies, and in particular large companies, are more capable of providing EK than other types of interest representation, because of their Research & Development divisions (Bouwen, 2002). IEEI is the second kind of access good, which is the private sector's aggregation of EU interests about the specific policy problem (Bouwen, 2002). Lastly, the third group of access goods is information that the private sector has on DEI, i.e., in this thesis an aggregate of IDEI within Denmark with regards to how the energy directives should be addressed.

The concept of encompassing interests is an aggregation of individual interests (Bouwen, 2002, p. 370). Whether the interest of an interest group is encompassing depends on how it differs from interests of other interest groups, their kind of members, how representative the interest group is, and how legitimate it is in the public and among the public authority (Schmitter & Streeck, 1999). The common assumption and characteristic of all access goods is that information is the basic and most important resource for exchanges between business interests and political institutions (Bouwen, 2004), i.e., the Commission in this case. This part of the theoretical framework will be used to analyze the feedback submissions by the four Danish interest representation. Its primary applicability for this study is to use it to examine the type of access good that the Danish interests offer the Commission, in order to gain access to the policymaking process. The theoretical assumption is that representatives of business interests will primarily make use of EK, as the organizations also represent the interests of businesses and their EK.

4.2 Supply and Demand of Access Goods

While the theory of access provides a theoretical approach to find the use of access good by an interest representation, it cannot by itself explain why the Commission provides access to some interests and not to others, even if they have the same access good. Hence, there is a need for another layer concerning the supply and demand of the access good. The supply side of the theory consists of business organizations, companies, etc., who want to influence EU legislation according to their interests (ibid.). In this thesis, the supply side consists of Danish companies and business organizations. The demand side of access goods are EU institutions, where the thesis will examine the demand of access goods by the Commission. The level of demand and supply determines how much access business interests can gain within the EU institution. The highest degree of access is provided to business interests that can provide critical access goods both in terms of how critical the resource is for the organization to operate, but also how critical the resource is in the eye of the EU institution (Bouwen, 2002). Hence, the assumption is that if the Danish interests have a critical resource pertaining information on the energy sector, their ability to obtain access to the agenda-setting increases.

The supply of access goods depends on the organizational form, which further impacts the type of representation the interest engages in. There are three kinds of interest representation: collective bargaining, individual firm action, and third party-representation (Ibid.). The type of interest representation a company chooses to engage in depends on the size of the company, their economic strategy, and the domestic institutional environment (ibid.). Larger companies are more capable of individual firm action than small companies, because they have more resources for political action. The resources required for companies who want to do individual action are vast, because of the complex nature of the EU political system and the large need of resources to establish an office in Brussels that enables direct lobbying on the EU institutions (Hix, Noury, and Roland, 2006; Bouwen, 2002). Hence, smaller companies and actors are more reliant on collective bargaining than larger companies to gain access through interest representation, as it is less resource intensive (Bouwen, 2002). The last alternative is third party interest representation, which is less resource intensive than individual firm action, as the company will be represented in their interests, but can always withdraw.

The company's economic strategy is the second variable that factors in when companies decide on what kind of interest representation they wish to engage in, as different economic strategies call for

different political strategies. Large companies with multinational operations have an economic strategy that calls for direct contact with decision makers at EU level. Conversely, when the economic strategy is primarily based on national activities, there is not the same need for direct contact with policymakers, as they can get representation in the EU institution through memberships of the equivalent EU association (ibid.). Lastly, the organizational form of lobbying representation depends on the domestic institutional environment, where especially the level of state administrative autonomy and state control can decrease the incentives for EU level action. The relationship the company has with the national state can also impact the possibility of access at EU level through the Council, as more access is provided if the company has good relations with the government. Moreover, the domestic associational structure also has an impact on how the business interest decides to organize in interest representation, as if there is a tradition for strong national trade associations domestically, the business interest is more willing to organize in the same type of association at EU level (Ibid.). Lastly, the attitude towards lobbying at the national level can impact whether the company is incentivized to engage in interest representation at both national and EU level. This part of the theoretical framework will be applied to the second part of the qualitative analysis by examining the strategy of the Danish interests concerning their engagement in one or more types of interest representation, and whether the organizational form can explain the type of representation.

Moreover, the quantity, quality, type of access good, and the efficiency of the supply of the good are central aspects for companies to establish an exchange relationship with the EU institution. These aspects depend on whether there are several layers of organizational form, e.g., if the individual company is both a member of a national association and an EU association or if the Danish business organizations are members of European associations. Individual company representation has the advantage of being more efficient than other types of interest representation, as there is merely one layer (Bouwen, 2002). The complexity of the internal decision-making process of the organization affects the efficiency of the access good. Thus, a hierarchical company is more likely to be more efficient than a decentralized association (Bouwen, 2004). However, if the access good is of high quantity and quality and serves as an encompassing interest, the complexity of the internal decision-making process becomes less important. This is, because it is impossible to avoid a higher degree of complicated decision-making processes when the access good is of encompassing interest (Ibid.). This theoretical approach will be applied slightly differently than originally intended in the theory. As the examined interest representation consists of either companies or business organizations, the number

of layers is not as relevant as it would be if the analysis only consisted of companies. Hence, this theoretical approach is used as part of the theoretical framework that analyzes the amount and validity of the supply that the Danish interest offers the Commission.

While the four above mentioned components explain the supply-side of access, the demand of access goods by the Commission is another important aspect. The formal power of each institution and when in the decision-making process that they have legislative power has a large impact on the institutions' demands of access goods (Ibid.). The demand for access goods increases when the good helps the institution to fulfill their legislative role. As the Commission is the most supranational of the EU institutions in the decision-making process, it generally promotes common European interests and tries to uphold the significance of its own position in promoting these interests (Rometsch & Wessels, 1997). Conversely, the Commission is not as interested in IDEI, as it is more interested in promoting common European interests. Nonetheless, as the Commission is the agenda-setting EU institution, it is responsible for drafting legislative proposals, which requires a high amount of EK, especially within areas that entail very specific expertise. Hence, the critical resource for the legislative work in the Commission is expected to be EK. As the Commission has limited resources, it is dependent on external resources to get the right expertise in the agenda-setting phase (Ibid.).

Regarding the demand and supply side of access goods, the theoretical basis is, thus, that large Danish individual companies are more able to gain access to the Commission due to their capability of providing EK, followed by European associations due to their knowledge on the IEEIs. National associations have a rather low possibility of gaining access to the Commission, as its access good, IDEI, is not as important in the agenda-setting phase of the policy cycle. However, as the national associations in this thesis concern business organizations, these are assumed to attempt to offer EK as an access good. Figure 4.1 provides an overview of what access goods different interest representations provide, and what type of access good the Commission is interested in. Nonetheless, empirical evidence using Bouwen's theory of access has found that European associations are better at obtaining access to the Commission than individual firms, as the Commission's primary role is to get support on legislation from all MS to get it accepted (e.g. Bouwen, 2004). However, as this thesis examines the interest representation only of Danish business organizations and companies, whether European associations empirically have easier access to the Commission does not impact the analysis of how well Danish business interests gain influence on the Commission, as these two are not

compared. Rather, they are studied as a combination of influence if the Danish interest representations are members of European associations as well.

Figure 4.1 Rankings of the Best Provision of Access Goods by the Supply Side and Ranking of Critical Resource Dependencies in the European Commission

	Expert knowledge	Information on European Encompassing Interest	Information on Domestic Encompassing Interest
Individual Company	1 st	3 rd	2 nd
European Association	2 nd	1 st	3 rd
National Association	2 nd	3 rd	1 st
European Commission	1 st	2 nd	3 rd

Source: Bouwen, P. (2002). Corporate Lobbying in the European Union: The Logic of Access. *Journal of European Public Policy* 9:3. pp. 365-390.

4.3 Lobbying Strategies

The sub-sections above have provided theoretical arguments for the use of the Theory of Access and the supplements of supply and demand of access goods, which will be used to explain how business interests gain access to the EU institutions. However, while access is crucial to obtain influence, business interests do not gain influence merely because they have access to the policymaking (Klüver, 2013). The following introduction of lobbying strategies of interest representation is, thus, done to provide an approach that examines how Danish business interests strategize to influence the policymaking and whether the strategies differ on how much influence that can be exerted by using them.

Private interest groups can make use of different strategies to influence the policymaking in the EU. The two most prevalent ways are inside and outside lobbying. Inside lobbying is about gaining direct access to policymaking to influence from within. Information is vital in this type of lobbying, as the policymakers need external expertise on the policy issue due to their limited resources, time constraints, and lack of technical knowledge on the subject (Weiler & Brändli, 2015). As interest representations have vast knowledge on their area of activity, they can play a vital role in policymaking through insider lobbying (Dür & Mateo, 2013). Inside lobbying does not generate much public attention, because it is done within the policymaking institutions themselves, such as meetings with policymakers, being part of an expert panel in committees, online contact, etc. (De Bruycker & Beyers,

2018). Even though the relationship is beneficial for both parties, policymakers know that business interests provide them with information that is favorable for the goals of their interests. Hence, policymakers generally consult interests with opposing views and lobbying approaches (Beyers, 2004). Conversely, outside lobbying is not about gaining access. Rather, it is when interest representations go public to indirectly put pressure on policymakers through public attention, e.g., by mobilizing citizens, media campaigns, social media, etc. (Weiler & Brändli, 2015). Some interest groups use it as another measure to influence the policymaking process, as they know that policymakers want the view of business interests that can mobilize citizens (Ibid.). The purpose of outside lobbying is to influence policymaking by making the population aware of the policy issue. The higher the level of public support, the more likely the interest representation is to influence the legislative proposal, as policymakers risk electoral damage if they do not listen to voters (Ibid.).

Another way to distinguish lobbyism in the Commission is the use of formal and informal lobbying (Dionigi, 2017; Ydersbond, 2012). According to Ydersbond (2012), formal lobbying, i.e., institutionalized, is participation in expert committees with Directorates Generals or working groups, where informal, i.e., non-institutionalized, lobbying can be, e.g., media campaigns. Further, she argues that lobbyists can make use of both formal and informal meetings with policymakers within the Commission, either by the initiative of the interest group or Commissioner (Ibid.). Dionigi (2017) describes the two forms of lobbying with another focus. Formal lobbying is similar to inside lobbying in Dionigi's theoretical framework, where there is a resource exchange on information, which is evident through official documents, positions, reports, etc. Informal lobbying is defined as long-term lobbying, where the interest attempts to create a trustful relationship between it and members of the EU institutions (Ibid.). Most interest representations use both informal and formal lobbying, but the composition of the types of lobbying as well as the quantity and quality of resources that the interests can offer affect the influence that they can have on the policymaking process (Ibid.).

Understanding the different types of interest representation is crucial to recognize the type of lobbying strategy used. A typology of interest representation divides the types of interests into four categories: direct lobbying, political exchanges, contentious politics, and private interest government (Erne, 2011). These four categories are made of two dimensions consisting of the degree of autonomy relative to the political system and the degree of necessity of collective action (figure 4.2). The first category, direct lobbying, concerns interest groups that have personal access to the decision-makers.

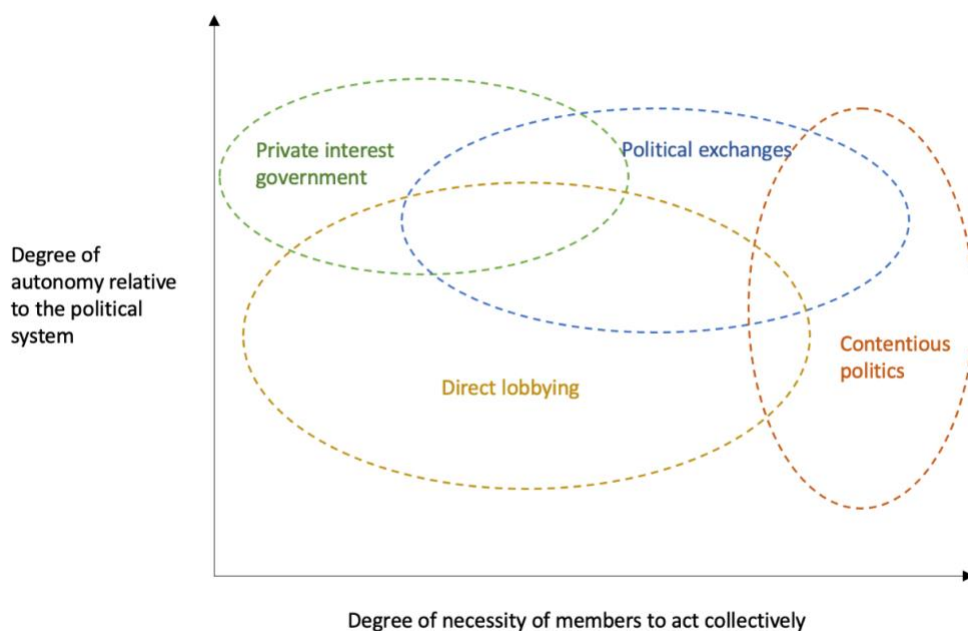
This type of lobbying is generally used by business organizations and at times labor unions and social groups (Ibid.). How successful the interests are at influencing the policymaking depend on their resources such as lobbying budget, their legitimacy, as well as their expertise in the field. The accessibility of decision-makers and the success of lobbying efforts also depends on how technical the issue at hand is.

The second category of action to influence policymaking is political exchange, which is when governments or the like exchange goods with unions or employers to obtain social content as well as EK. This type of lobbying action is primarily used by business organizations and trade unions. However, it can be argued that also corporate lobbying is part of political exchange, as companies exchange information crucial to the decision-making process to gain access to and influence the political process (Erne, 2011; Bouwen, 2002). The third category of lobbying action is contentious politics. This category is similar to outside lobbying, as interest organizations try to influence policymaking indirectly by organizing social movements such as strikes to show and influence the public opinion on a particular issue. This is done to get institutions to make a compromise in the legislature. Those engaging in contentious politics are organizations that have a high level of collective action such as trade unions (Erne, 2011). The last category of action is called private interest government, which is when the state delegates some of its authority to the relevant interest groups providing them the power to make binding decisions. This type of action is prevalent within, e.g., the agricultural sector, where self-governing producer associations self-police the sector and its production, distribution of goods, etc. (Ibid.).

In this thesis, the categories of interest in terms of how interests influence the decision-making are direct lobbying and to some extent political exchange, as these are the primary strategies that the Danish interest groups and corporations are expected to make use of when trying to influence the two energy directives. However, the means of formal and informal lobbying will also be examined, as some of the Danish interests have direct or indirect elements of some of the other types of lobbying efforts, e.g., outside lobbying. The primary focus will by nature of the data be on the formal parts of the lobbying as it is more tangible, where the means of informal lobbying is based on the conducted interviews as well as interpretations of the collected data. This part of the theoretical framework will be applied to the latter section of the directed qualitative content analysis (DQLCA) that examines the

parts of the Danish interests' lobbying strategies that cannot be adequately explained based on their feedback submissions.

Figure 4.2 Measures of actions of interest groups



Source: Erne, R. (2011). Interest Associations. In D. Caramani, *Comparative Politics 2nd edition* (p. 267). Oxford : Oxford University Press.

4.4 Lobbying Context of the Commission

The basic underlying assumption is that all actions by the Commission are done to secure the survival of the institution (Klüver, 2013). Consequently, the Commission's goal is to adopt legislative proposals that successfully pass the legislative process. To obtain this goal, the Commission needs information, economic power, and citizen support (Ibid.). Hence, whether interests can influence EU policymaking depends on their capability of providing these access goods to the Commission as well as the demand of the Commission, which is conditioned upon the nature of the policy issue at hand. As energy policies tend to be highly technical (Jefferson, 2000), the Commission's demand of access goods will, ceteris paribus, be higher than in less complex policy areas, providing easier access for the Danish interests. In their efforts of lobbying the Commission, interest representation has the benefit of being part of the early stage of the policymaking process, i.e., the agenda-setting phase. This increases the possibility of influencing the policymaking, as interests influence the choice of problems to address and measures to make (Farrand, 2015). Moreover, later on in the policymaking process, the interest groups will merely

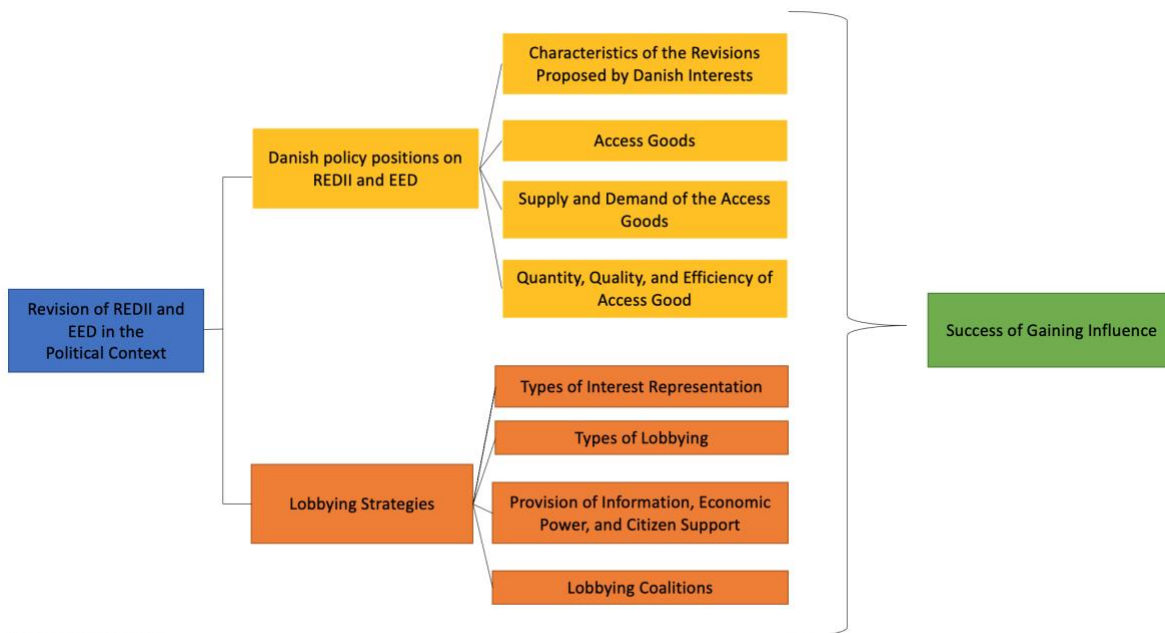
have to support and defend the legislative proposal if they have obtained influence in the agenda-setting phase, instead of trying to change parts of the legislation in the Parliament or the Council, which can prove more difficult than implementing it in the proposal in the first place (Mack, 2005). This means that as a legislative proposal progresses to later stages of the policymaking process, it becomes more frozen, i.e., difficult to change (Ibid.).

As the Commission has a rather limited number of administrative staff (Bouwen, 2009), the Commission is reliant on consultations with interest representations to get information on the policy issue, and ultimately, fulfill their institutional role. Generally, the Commission takes a few years to adopt the final draft of the legislative proposal, hence, the interest groups have a good amount of time to bring their knowledge to the Commission to exert influence in the content of the legislative proposal (Klüver, 2013). The theoretical argument is that due to policymakers constantly being confronted with interests, the success of their lobbying efforts will depend on the aggregated information supply, the economic power of the interest representation, and whether the issue is supported among the population. As the lobbying efforts of interest representation take place in a complex political environment within the EU institutions, the theoretical framework consists of the context in which interests and the Commission interact. This is, e.g., dependent on the complexity of the specific policy issue, which also affects the environment that the interest group is in and the possibility of influence. The more complex, technical, and far-reaching the policy issue is, the higher demand the Commission has for external EK, and it will therefore be correspondingly more willing to do resource exchanges with policy groups (Klüver, 2013).

Lastly, the institutional context should be considered when examining the Danish interests' ability to influence policymaking. This involves an understanding of overall lobbying efforts, as several interest groups try to lobby the Commission simultaneously (Klüver, 2013). The bigger lobbying coalition that the interest representation is part of, the greater chance of influence (Ibid.). By lobbying coalition, I do not mean that the interests form official alliances or coordinate their lobbying strategies. Rather, the concept contains all interest groups and companies that lobby for the same policy goal and consequently try to influence the policymakers towards a common direction. Thus, the theoretical argument is that issue-specific lobbying coalitions are more likely to influence policymaking depending on their provision of information, economic power, and overall citizen support (Ibid.).

All the above-mentioned aspects will be part of the analyses as they are implemented in the coding scheme of the DQLCA explained in section 5. Figure 4.3 provides an overview of how the different components of the theoretical framework are applied to find the Danish interests' strategies to gain influence on the final legislative proposals presented by the Commission. Hence, the figure shows the four components that are analyzed in the feedback submissions by the Danish interests and the four components that are used to analyze the overall lobbying strategies of the Danish interests. This will lead to the results on what strategies they used to obtain influence on the two directives and whether these strategies allowed the desired influence on the final proposals. Hence, this thesis additionally contributes to the existing literature by developing a new theoretical framework that is more multi-dimensional by both including Bouwen's theory of access and several components concerning lobbying strategies to cover both the dimension of access but also the dimension of asserting influence if access is provided.

Figure 4.3 Components Applied to Examine the Strategies by Danish Interests to Gain Influence



Source: Own creation.

5. Methodology

This section presents the methodological framework of the thesis. The section will start out by introducing the research design regarding the use of methods (5.1). Next, the philosophy of science position is introduced, which lays the foundation for the use of methods in this thesis (5.2). Thirdly, the case-study method is presented (5.3), which is followed by an introduction of the data collection (3.4). Thereafter, the operationalization (5.5) is presented, and the section ends with a justification of the delimitation of the thesis (5.6).

5.1 Research Design

The methodological approach of this thesis is mixed method, i.e., the analysis will contain both an element of quantitative and qualitative methods. The former consists of a quantitative content analysis of all submissions to the early feedback consultation on both the revision of REDII and EED by all countries and interests. This part of the analysis will be conducted to quantify how many interests submitted a position to the directives and whether these positions were similar or dissimilar to the positions of Danish interests as well as the general support of the revisions. This will also indicate whether Danish interests were part of lobbying coalitions by having a similar opinion as other interests on the revisions (Klüver, 2013). The quantitative method will be done by inserting the interests' positions in the computer program "Wordfish".

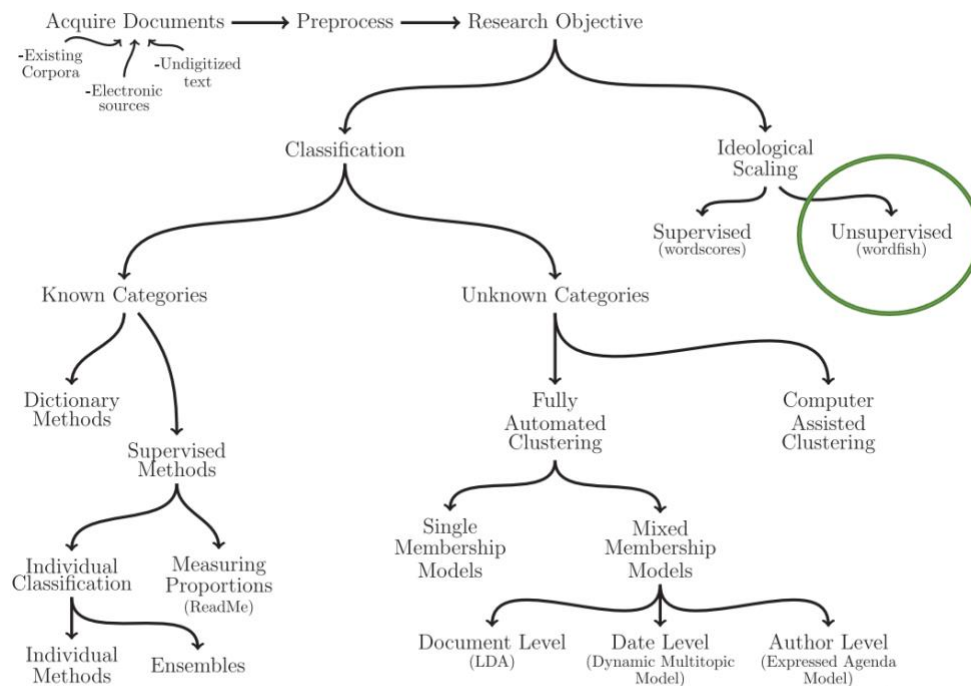
Wordfish is the most recent method of digital quantitative text analysis (Proksch & Slapin, 2009). It is a statistical scaling model, which helps estimate policy positions of texts based on a predefined policy dimension. This is done by extracting the relative word frequencies in texts based on the underlying assumption that words are distributed according to a Poisson distribution (Ibid.; Klüver, 2013, p. 70). The Poisson distribution is similar to natural language due to a vastly skewed distribution of word usage, and it used it to show how many times an event is likely to occur within a specified period (Proksch & Slapin, 2009). In this thesis, the distribution is used to examine how many times a specific word is used in a document relative to other words and the length of the document. The Poisson distribution has one parameter, λ , which is a measure for both the mean and the variance at the same time. The model that Wordfish uses to estimate the policy positions in texts is:

$$y_{ij} \sim \text{Poisson}(\lambda_{ij})$$
$$\lambda_{ij} = \exp(\alpha_i + \psi_j + \beta_j * \omega_i)$$

Here, y_{ij} is the count of the word (j) in a given text (i). α_i is a set of text effects controlling for the length of the measured documents. ψ_j is a set of word fixed effects, which control for some words being used more frequently than other words in a text such as articles and prepositions. β_j is an estimate for how important a word is and how much it should weigh when capturing the policy position of the text. Lastly, ω_i is an estimate for an actor's (i) policy position. The measure of λ_{ij} (i.e., the righthand side of the equation) is estimated based on an expectation maximization algorithm, which makes it possible to estimate the policy position even though it is not a directly observable variable (Proksch & Slapin, 2009). All of this is part of the Wordfish algorithm, which means that the Wordfish software is downloaded into a program and does the calculation.

The model itself has several steps. It sets the first text effect, i.e., α_1 and the mean of all policy positions to zero, while setting the standard deviation to one, i.e., the standard normal distribution. The confidence intervals of the policy position estimates are found by using a parametric bootstrap, which implies that the confidence intervals will shrink with the increase of the number of unique words (Klüver, 2013, p. 70). This happens because every unique word that is observed is treated as an independent observation, which means that the more unique words there are in the documents, the more data is obtained for the estimate of the policy positions, i.e., the estimates will be of higher confidence (Proksch & Slapin, 2009). When conducting an analysis using Wordfish, there are three assumptions to consider. First, the model assumes that the relative frequency of words used within and across documents reflects the policy positions they entail. The second assumption is that the meaning of all words is the same within and across all documents. The third assumption is that the policy position is estimated based on a single dimension, hence only those sections within a document that relate to the specific issue should be included in the analysis conducted in Wordfish (Ibid.). The validity of these assumptions is tested in the analysis (Grimmer & Stewart, 2013).

Figure 5.1 Placement of Wordfish in Text as Data Methods



Source: Grimmer, J. & Stewart, B.M. (2013). Text as Data: The Promise and Pitfalls of Automatic Content Analysis Methods for Political Texts. *Political Analysis* (2013). pp. 1-3.

The second part of the analysis is qualitative and consists of a DQLCA (Hsieh & Shannon, 2005). As DQLCA is deductive in nature, it uses theory as part of the coding, hence there is a strong connection to theoretical categories from the start. This means that the DQLCA is based on the theoretical framework, which will enable an in-depth analysis of the content of the Danish feedback submissions. Thereby, the DQLCA is used to evaluate specific patterns based on theoretical codes both within and across the feedback provided by the Danish interests. A DQLCA is more structured than a conventional content analysis, as the theoretical framework helps identify coding categories as well as the operational definitions of the categories (Ibid.). The coding strategy of this study is the second strategy proposed by Hsieh and Shannon (2005, p. 1282) which is to code with predetermined codes based on the theoretical framework. This is done by coding the feedback submissions, where relevant text to the initial codes is highlighted and coded accordingly. If some of the data cannot be coded, it will be analyzed to determine whether they represent a new category, belong to a subcategory of an existing code, or should be disregarded. The analyzed patterns are divided into the codes presented in figure 5.2.

Figure 5.2 Codebook

Code Definition	Explanation
Characteristics of the Danish Policy Positions	Whether the Danish interests recommend a revision, if the recommendations are specific and a certain topic or article, if the recommendation is more general in character, and what policy option they indirectly recommend.
Access Goods	The access goods the Danish interests offer the Commission.
Supply and Demand of Access Goods	Whether the Danish interests deliver a critical resource and if the supply fits the demand.
Quantity, Quality, and Efficiency of the Access Good	Whether the quantity, quality, and efficiency that the Danish interests can provide fit the demand of the Commission and help fulfill their institutional role.
Types of Interest Representation	What interest representation the Danish interests use and whether the type of interest representation depends on the organizational form.
Types of Lobbying	Whether the Danish interests primarily make use of direct lobbying and political exchanged as assumed in the theoretical framework.
Provision of Information, Economic Power, and Citizen Support	Whether the Danish interests provide information, economic power, and citizen support to the Commission.
Lobbying Coalitions	Whether the Danish interests are a part of a large lobbying coalition.

Source: Own creation inspired by the Directed Content Analysis invented by Hsieh, H.F. & Shannon, S.E. (2005). Three Approaches to Qualitative Content Analysis. *Qualitative Health Research* 15:9. pp. 1.277-1.288.

This codebook is used in the DQLCA to support or challenge the relevance of the theoretical framework regarding the research question. The DQLCA will first be conducted on the consultation answers by the relevant Danish interests on REDII and EED. This will be followed by an examination of the lobbying strategies of the Danish interest groups and whether the theoretical expectations are confirmed, as presented in the codebook above. Lastly, the results on the DQLCA will be compared to the Commissions' final legislative proposals on REDII and EED as well as a brief examination of the feedback provided by the interests after the adoption of the directives. All of which are used to conclude upon whether the Danish interest groups and companies were successful in influencing the final proposal.

5.2 Philosophy of Science

In the study of social phenomena, different levels of abstractions can be applied. The type of abstraction affects how the social phenomenon is perceived and the use of. This thesis will use critical realism as defined by Sayer (2000) as its philosophy of science position in order to explain the influence by Danish interests on the two energy directives. A central part of critical realism is the notion of the intransitive, i.e., the real world and all phenomena within it, and the transitive dimension, i.e., the knowledge of the observer at any given point in time (Ibid.). These dimensions are independent of one another, hence a change in one dimension does not necessarily mean a change in the other. In this thesis, observations and knowledge can be obtained on how successful Danish interests are at asserting influence on the Commission, i.e., the transitive dimension, but there will also be other phenomena and mechanisms happening at the same time in the intransitive dimension that impact the findings, but that we do not have knowledge of.

Ontology within critical realism is different from other philosophy of science positions, as it covers both the social and natural science and acknowledges the existence of an external reality independent from our knowledge of it (Sayer, 2000). The ontology further states that reality consists of complex overlapping layers, where each layer has its own distinct features and can be ascribed to three different domains: the empirical domain, i.e., the experiences and observations regarding an event; the actual domain, i.e., all events and phenomena that happens; and the real domain, i.e., the deep domain that regards structures and mechanisms within reality itself. In this line of thought, reality is an open system where similar causal powers can lead to very dissimilar outcomes depending on their context and vice versa (Ibid., p. 15). This aspect is applicable when analyzing the success of influence of Danish interests on the energy directives, as they all potentially have the same causal powers, but the amount of influence can depend on the context.

Epistemologically, critical realism argues that knowledge is not linear but accumulative, where the object of knowledge changes through time. The epistemological argument emphasizes the importance of knowledge production, where the social process of the produced knowledge is made up of existing knowledge and theories. For instance, interests want to acquire knowledge on the green transition, because the object of society in these years is to combat the challenge of climate change. Lastly, the critical realist philosophy of science position generally rejects the model of regular successions, i.e., that causal inferences are based on the analysis of regularities (Ibid.). Rather, identifying causal

mechanisms provide the explanation for how they work when activated and when taking the context into account. However, as structures and mechanisms are difficult to observe, it is rather the effects of the mechanisms that can be observed and used as an explanation for why the event has happened. This is a suitable approach in the analysis of the influence of Danish interests, as the context and knowledge of the interest representations is considered when measuring the success of influence through a deductive approach from the theoretical framework.

5.3 Case-Study Method

The purpose of the empirical investigation presented in this thesis is to examine the case of influence of Danish interests on REDII and EED through the components of the theoretical framework. Hence, the analysis will be based on the case-study method applied specifically to the case of Danish interest representation by examining the causal mechanisms of the theoretical framework that impacts how the Danish interests function in the real world. The purpose of the case-study is to obtain an in-depth understanding of a specific case in a specific time and activity through the analysis of different forms of information and data collection (Creswell, 2014). However, as a central part of the case-study method is to conduct a selection of the specific case, there is a need to specify the chosen case and how it represents the population.

There are several known strategies for case selection. Gerring (2012), distinguishes between three types of strategies for case selection: purposive, i.e., selection based on desirable features; random, i.e., drawn from a random population; or stratified random sampling, i.e., where several potential cases are then divided into different sections and afterwards the cases are drawn at random from each section. The strategy of case selection in this thesis has been purposive, as the examined interests have been purposefully selected based on specific features of 1) being Danish, 2) having responded both on the early feedback and to the open consultation of one of the directives, and 3) at least one type of feedback on the other directive. This leads to the case study consisting of four Danish interest representations that fulfill these criteria, which are 1) Danfoss and 2) DI, which are examined on both proposals, 3) DE that is examined on REDII, and 4) VELUX that is examined on EED. Hence, these interest representations will represent the imposed Danish influence on the Commission. The case-study method enables a detailed examination of understanding the context and mechanisms for whether these Danish interests were successful in influencing the final legislative proposals.

5.4 Data Collection

Considering the means of data collection, the forthcoming analysis relies on both primary and secondary data. The primary data consists of exploratory interviews, where the secondary data consists of: 1) documents from the EU on all interests' contributions to the consultative phases of both directives, 2) feedback from interests after the Commission presented the final legislative proposals, 3) public documents and database information of the Danish interest organizations and companies, 4) written documentation from the websites of the Danish interests relevant to this specific case study, and 5) databases such as the EU Transparency Register, EUR-Lex, and Transparency International that provide information on the lobbying strategies. As the secondary data will be processed and analyzed, some of it will turn into new primary data. For instance, the Wordfish applied to all policy positions brings out new data that can be used in future studies. Further, the thesis will rely on material from within the EU on the initial consultation proposal for the revision of the energy directives and the adopted final proposals on both directives to analyze whether Danish interests were able to influence how the directives turned out, etc.

The primary data has been collected through semi-structured individual interviews. The interview guide approach (Patton, 1990), i.e., the semi-structured approach (Burns, 1999), makes use of specified topics and questions but also enables a rewording of the sequence and the questions according to what fits the specific situation. This makes the interview more conversational, but still systematic in a way where the collected data can later be compared and contrasted (Fraenkel & Wallen, 2003). This method allows a focus on specific themes and predetermined questions for the interviewee to answer, but also allows the interviewer to explore other areas of the themes than initially intended, providing the opportunity to explore topics relevant to the particular interviewee (Leech, 2003). These predetermined questions have been designed based on the theoretical framework. Hence, all questions asked to the interviewees are asked within five predetermined themes: 1) Context and knowledge on EU affairs, 2) Process Tracing, 3) Access Goods, 4) Lobbying Strategies, 5) Lobbying Success (an interview guide is presented in appendix A).

The initial plan was to conduct interviews on all Danish organizations and Danish companies that either provided feedback on both REDII and EED or provided different types of feedback on either of the directives (cf. appendix B for an overview of all Danish feedback). However, as this has not been possible due to the representatives of the companies and organizations being unavailable, the

conducted interviews are a combination of Danish companies and organizations that have provided feedback to the legislative proposals on the revision of the REDII and the EED as well as other interests or experts on the area (Meuser & Nagel, 2009). In total, five interviews have been conducted with the following experts:

Interviewees	Title
Maja Kluger Dionigi	Expert on lobbying in EU and Senior Policy Adviser of European Affairs at Confederation of Danish Employers
Anne Birk Mortensen	Policy Adviser on EU affairs, Danish Chamber of Commerce
Thomas Martinussen	Senior Vice President and Head of Legal and Corporate affairs, Clipper Bulk
Lars Olsen Hasselager	Head of Climate, Danish Shipping
Andreas Brunsgaard	Senior Adviser for European Affairs, Confederation of Danish Industry

All of the interviews have been conducted as exploratory interviews (Bogner & Menz, 2009), i.e., as part of the collection of primary data that supports or challenges the arguments and findings of the content analysis of the Danish feedback to the Commission (Hose, 2017).

The use of both primary and secondary data as well as the use of mixed methods impacts the validity and reliability of the findings. This is because different types of data collection as well as obtaining data through different sources augment the validity and reliability of the data as well as how this data is interpreted in the analysis (Zohrabi, 2013). As validity concerns whether the research is believable and evaluates what it is supposed to (Ibid., p. 258), the use of different types of methods and data increases the validity if the findings are coherent and the data supports each other. Especially when both the quantitative and qualitative methods provide similar findings on the possibility of asserting influence on the policymaking in the Commission, the internal validity is increased through triangulation (Bryman, 2016). Triangulation ensures that the results are pressure tested by applying mixed methods to the same data, and if they get the same results, the findings are assumed to be credible and valid. To decrease bias in the study, I have been critical of all used sources to ensure as much internal validity as possible (Ibid.).

Additionally, applying both quantitative and qualitative methods, i.e., text analysis of political positions and qualitative content analysis of the consultation and feedback submissions increases the external validity. The external validity is augmented if the research is generalizable to other contexts and subjects (Zohrabi, 2013). Even though this study is based on a case-study method of Danish interests' influence on REDII and EED, the external validity will increase if the findings can be applied to another context. This study argues that the external validity is improved by use of the written documentation. As the EU is transparent in their policymaking, the same research can be applied on other areas of research, e.g., on another policy area such as the agricultural area or on other subjects, e.g., business interests from another MS.

Lastly, the use of mixed methods impacts the reliability of the study and findings (Bryman, 2016). The internal reliability is on one hand augmented, because the methods complement each other, the theoretical assumptions have been defined and quantified, and the written data has been mechanically recorded, hence it will be the same for all researchers. On the other hand, the internal reliability is decreased as this thesis has merely one researcher (Ibid.). However, as this is kept in mind, the research and data have been discussed with the supervisor and the interviewees have been presented with the result of the data collection. Regarding the external reliability, the fact that it was not possible to obtain interviews with all the interest representation and companies, *ceteris paribus*, has a negative impact on the external reliability, as the interviews may have provided data that could have supported other arguments. Nonetheless, by conducting interviews on several kinds of actors, and if these views generally support the findings of the secondary data, the external reliability increases, because the results would be similar if replicating the study (Ibid.).

5.5 Operationalization

Evaluating the success of influence by Danish interest representations requires an operationalization of the theoretical framework (Roskam, 1989). The theory of access was originally tested on legislative lobbying in the European financial sector, where Bouwen conducted a series of interviews with policymakers (Bouwen, 2002). In this thesis, the theory will rather be operationalized on gaining access to the policymakers in the Commission by interests asserting their knowledge in the agenda-setting phase of the policy cycle and consequently trying to impact the energy directives' final legislative proposals. Furthermore, while the theory is intended to examine the access for business interests, i.e.,

where the focus is on the individual business lobbying by themselves or through collective action, this thesis characterizes business interests as either 1) an individual company, where the focus is on its individual lobbying activities, 2) the lobbying activities of a lobbying coalition, where the individual companies are firstly viewed separately and then as a coalition with the same intent of how to influence the policymaking, or 3) an interest organization or third-party representation, where the individual company is not examined but rather all the companies represented by the organization as a whole. It should be noted that some of the consultation and feedback submissions were provided by individual Danish citizens. These will not be part of the analysis, as they do not represent business interests of Danish actors.

In order to examine whether Danish interests were able to exert influence by offering access goods, the concept of "access goods" needs to be operationalized. In this thesis, an access good is characterized as the knowledge and expertise that the organization or company provides in their consultation or feedback submission (Bouwen, 2002). This knowledge is either 1) technical, 2) geographically specific, 3) industry-specific, or 4) specified to a particular aspect of the proposal. The same operationalization of the concept of influence must be performed to present a measurement of influence and what this measurement contains (Dionigi, 2017). Influence by Danish interests is operationalized by conducting the DQLCA of their policy positions from the interest group consultation submissions and feedback, which is followed by examining the other elements of their lobbying strategies presented in the codebook of the DQLCA, which will lastly be compared with the Commission's final legislative draft and whether they have implemented the recommendations of the Danish interests. This DQLCA will make it possible to draw a conclusion on whether the Danish interest groups and companies asserted influence on the decision-making in the Commission. Lastly, the success of the lobbying efforts by Danish interests is operationalized with inspiration from Dür and Marshall (2014), and is characterized by comparing the actor's recommendations in their position with the actual outcome of the decision-making process present in the final legislative proposals on the two energy directives.

5.6 Delimitation

Delimitation has been a crucial part of finding the final scope of the thesis and the selection of the case study to obtain a consistent and focused analysis (Bryman, 2016). Firstly, the analysis of the EGD has been chosen, as it is one of the most ambitious deals that the EU has ever made and is globally among

the most ambitious action plans for combatting climate change (European Commission, 2022a). However, as the EGD consists of a comprehensive action plan of numerous policies, revisions, legislation, etc. (Ibid.), it would have been infeasible to examine the influence of lobbyism within all aspects of the Deal. Hence, the focus has been delimited firstly to the energy area of the Deal, as it covers 75 percent of the total GHG emissions in the EU area, and therefore, is argued to be the most important area of the EGD (Ibid.). The scope of focus has been further narrowed to two specific directives within the energy policy area in the EGD. As mentioned in the introductory part, the thesis has delimited the scope to REDII and EED, as these are the most influential within the energy policy area, as energy savings is the fastest way to reduce emissions, i.e., reach the ultimate objective of becoming emission neutral, and the transition away from highly emission-heavy fuel relies on the use of renewable energy (European Commission, 2019a; European Union, 2022). By narrowing the focus onto two specified directives it is possible to go into greater depth with the lobbying efforts and potential influence on the legislative outcomes of the Directives.

Further, another delimitation has been conducted by making a case study on the success of Danish lobbying efforts in the Commission. Rather than conducting a superficial content analysis on the position of all MS' interest representations on REDII and EED, this thesis seeks to make an in-depth analysis by focusing on the influence of Danish interests (Bryman, 2016). However, the countries will be analyzed overall to identify the context that the Danish interests have operated in when trying to influence the final legislative proposals (Klüver, 2013). Lastly, analyzing the success of Danish interests in obtaining influence on REDII and EED has been limited to an analysis of their lobbying efforts on the Commission. As influence can be asserted by interest groups and companies throughout all the EU decision-making process and on different EU institutions (Coen & Richardson, 2009), the scope has been delimited to lobbying efforts on the Commission. The line of reasoning for limiting the focus to the Commission is based on the theoretical argument presented in the section of the theoretical framework that business interests have the greatest opportunity to assert influence on the decision-making in the agenda-setting phase due to their EK (Bouwen, 2002).

6. Analyses

Up until now, the thesis has presented relevant existing literature, the background on the topic of interest, the theoretical framework, and its methodical choices. The thesis now turns to the two analyses. The section starts with an examination of the initial communication by the Commission on both REDII and EED to assess the foundation that the interest representations submitted their positions on (6.1). This is followed by the first analysis, which is quantitative and will examine the policy positions of the feedback provided by all countries and interests on REDII and EED through the Wordfish method (6.2). The second analysis is qualitative and consists of the DQLCA conducted on the case-study. This part will examine the position of Danish interests on both directives, the aspects of their lobbying strategies according to the codebook, what they recommend changing in the final legislative proposal (6.3), and whether the Danish interests succeeded in getting them implemented (6.4).

6.1 Inception Impact Assessments of the Renewable Energy Directive II and the Energy Efficiency Directive

In August 2020, the Commission initiated a review of REDII with the objective of reducing EU's GHG emissions up to 55 percent by 2050 (European Commission, 2022b). The potential revision of the directive would help reach this target by assessing how much EU renewable energy rules could contribute to a higher EU climate ambition and hasten the green transition through a more integrated energy system (European Commission, 2020a). This led to the Commission presenting a roadmap to gain insight into the opinions of interests on how extensive this revision should be. This was done through an open feedback period, i.e., "have your say", where actors could submit their positions, which was complemented by an Inception Impact Assessment (IIA) published on August 3rd, 2020 (European Commission, 2020b). The IIA provided information on the context, the problem to be solved, possible policy options for a revision, and expected impacts of the review, so the interests had an indication of what issues their positions should confront (European Commission, 2022c).

As the IIA is not a guarantee for a revision or new legislation, but rather conducted to get a sense of stakeholders' positions, the assessment is an opportunity for actors to show their interests in the matter, whether the revision should be followed through, whether a potential revision should contain other issues to solve, etc. The initiative for this IIA was whether to conduct a revision of REDII from

2018 based on the targets in the EGD. The underlying problem the Commission wanted to tackle with this revision was to make energy more affordable and cost-competitive compared to fossil fuels and increase the use and variety of renewable energy sources as well as the contribution by all sectors to fully decarbonize, especially in other sectors than the electricity sector (Ibid.). All of which to reach the target of making Europe the first climate neutral continent in the world by 2050 (Ibid.). They proposed five options on how to implement the revisions: 1) No policy change and REDII stays as it is in the 2018 version, 2) use of non-regulatory measures such as information campaigns, 3) raise the ambition level of the directive in line with the 2030 Climate Target Plan, 4) amend REDII into legal measures, and 5) a combination of the three latter options (Ibid.).

The revision of EED also had an IIA. The initiative of this assessment was to review the directive from 2012 (which was also revised to some extent in 2018) in line with reaching the targets of the EGD and increase energy efficiency by at least 32.5 percent in 2030 (European Commission, 2019c). The most prevalent part of the initiative is to reach the guiding principle "Energy Efficiency First", which is one of the key means to decarbonize the whole energy system by 2050 (European Commission, 2020c). The idea of the principle is treating energy efficiency as an energy source in itself, which can be invested in on the same terms as all other renewable energy but is more cost efficient and less complex (European Commission, 2020d). Where the Commission presented five possible policy options in the revision of REDII, three options were presented in EED. These options were 1) No policy change, 2) non-regulatory measures, and 3) amend EED into legal measures.

6.2 Analysis on the Political Context

Having examined the initial communication of the Commission, the thesis now turns to the political context. The analysis of the political context is highly relevant, as it has an impact on the final influence that Danish interests could obtain on the directives. This is because if Danish interests were part of larger lobbying coalitions and the overall opinions were homogenous with the Danish opinions, it would, *ceteris paribus*, be easier for Danish interests to get their recommendations through, because their lobbying coalition would not oppose to it (Dionigi, Appendix I; Mortensen, Appendix J; Klüver, 2013). Hence, the following analysis will examine the submitted political position of all interests on REDII and EED by using Wordfish. The idea of conducting a computer-based text analysis is to estimate the policy positions of all actors and compare them to one another (Klüver, 2013).

Conducting the analysis of the documents by using Wordfish requires a few steps (Slapin & Proksch, 2008). These steps apply to both the analysis of REDII and EED. First, the policy dimension is found. As the analysis is conducted to examine the political context, the dimension consists of the positions of interests on both REDII and EED. This is done with a single policy dimension, where the interests that have provided feedback to the Commission are measured by on the one end of the continuum wanting the Commission to be very ambitious in the final legislative proposal and on the opposite end wanting the Commission to revise the two directives as little as possible. This means that the middle of the policy dimension is wanting the Commission to do some revision but not be all too ambitious. It is expected that the initial communication from the Commission is somewhere around the middle, both due to the findings of other empirical studies (e.g. Klüver, 2013) and due to the underlying mechanism of the Commission having to subconsciously consider the potential positions of the Parliament and Council, as found in other empirical studies (Coen & Richardson, 2009).

The next step is to define two documents that represent two opposing positions which Wordfish can use to estimate the policy positions on both ends of the dimension (Grimmer & Stewart, 2013). These documents are presented with the analysis of each directive. Thirdly, all documents are manually converted from pdf files or text submitted directly to the Commission into txt files and simultaneously rinsed for irrelevant text passages that do not refer to the revision of the directives. This also includes descriptions and names of the interest groups, footnotes, and all other parts that do not belong to the main body of the text. These are then compiled into seven categories concerning the types of interest groups, which are 1) Company/Business Organization, 2) Business Association, 3) Non-Governmental Organization, 4) Environmental Organization, 5) Public Authority, 6) Academic/Research Institution, and 7) Other. These groupings are based on the Commission's groupings (European Commission, 2020a). The original groups in the data also included EU and non-EU citizens. However, these have been removed from the dataset, as it is only the opinions of other interest representations that impact the Danish interests.

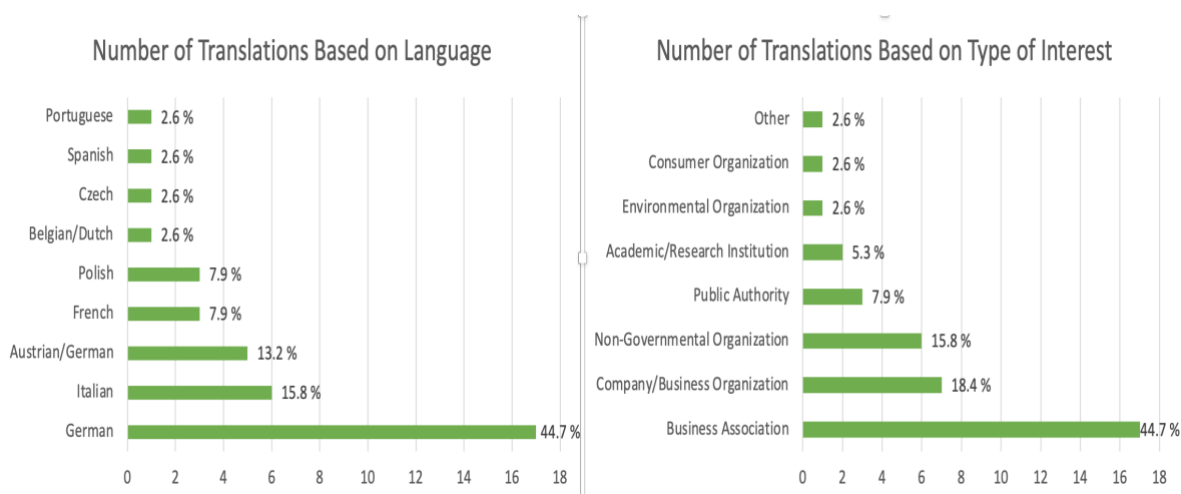
Next, as recommended by Proksch and Slapin (2008), the data is cleaned and preprocessed to find the essence of the documents. This entails removing stop words, i.e., commonly used words that do not contribute to the analysis, removing symbols, URLs, separators, and numbers. Further, all words are transformed into lowercase and stemmed, so words of different conjugates are all reduced to their roots. Then the word frequency matrix is produced as the input that Wordfish uses to analyze and

estimate the policy positions of the documents. The last step in the preprocessing is removing rare words that is only mentioned in very few documents by applying the command "sparsity". All of this is done using a TM Package in RStudio, which Wordfish is implemented into via Quanteda and finally run. For the sake of reliability, the documents have been divided into the groups they are placed in by the Commission (European Commission, 2020a; 2020b) The only exception is DI, as they have been placed in two groups respectively Company/Business Organization in the feedback to REDII and the group Business Association in the feedback to EED. To ensure consistency, DI has been placed in the former group in both feedbacks, as the same type of interest group generally has been placed in this group as well (Appendix C & D). It is worth mentioning that there, to my knowledge, have not been any empirical studies on policy positions within a sustainable agenda in EU using Wordfish except for Klüver's study (2013).

6.2.1 Quantitative Text Analysis of the Renewable Energy Directive II

A few final steps and notices specifically for the analysis of REDII needs to be addressed to obtain the Wordfish output. As Wordfish can only be used on one language at the time, all submissions made in other languages have been translated into English. Even though this creates a risk of changing the meaning of some sentences, it is more valuable to include them and risk some sentences being lost in translation, than not having the positions included in the data (de Vries, et al., 2018). Especially, as 44.7 percent of translated documents are either of the same type of interest (Business Associations) or of the same language (German). Hence, the reliability of especially the documents from business associations would be worsened (figure 6.1). Further, all documents registered as anonymous have been carefully assessed and divided into a proper category. However, most of the anonymous responses have been submitted by individual citizens and are therefore not part of the examined population. Lastly, if different interest representations have submitted the same attachment or if an interest group accidentally has uploaded their position more than once, only one has been compiled in the data.

Figure 6.1 Number of Translations Based on Language and Type of Interest on REDII



This preprocessing has resulted in 317 documents submitted to the early feedback consultation including IIA and the final legislative act (figure 6.2). As there was only submitted one response by respectively a consumer organization and trade union, these have been placed within the group of "Other". This type of interest also includes European interest groups, national working groups, and taskforces. All this data is what the corpus consists of when running Wordfish. The final step is to find and implement the two opposing documents. The document that is implemented as the positive one, i.e., one that requires the Commission to be more ambitious is from Recoup Energy Solutions Ltd, which is a company that provides wastewater heat recovery solutions (Recoup, 2022). The document implemented as the measure for the other end of the continuum, i.e., wanting REDII revised as little as possible, is from The Swedish Petroleum and Biofuels Institute, which is a business association for Swedish oil companies (SPBI, 2022). These documents have been chosen based on an initial analysis of the positions of all interests (Appendix G).

Figure 6.2 Overview of Early Feedback Submissions to REDII

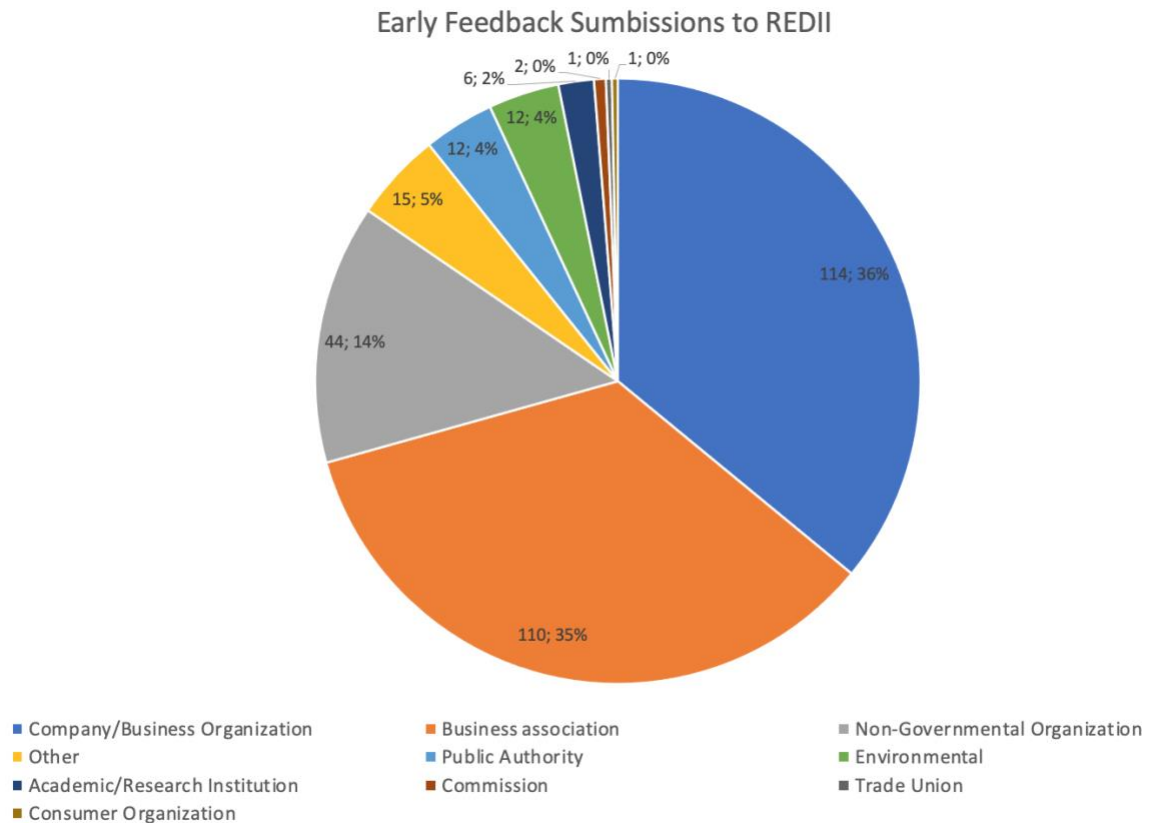
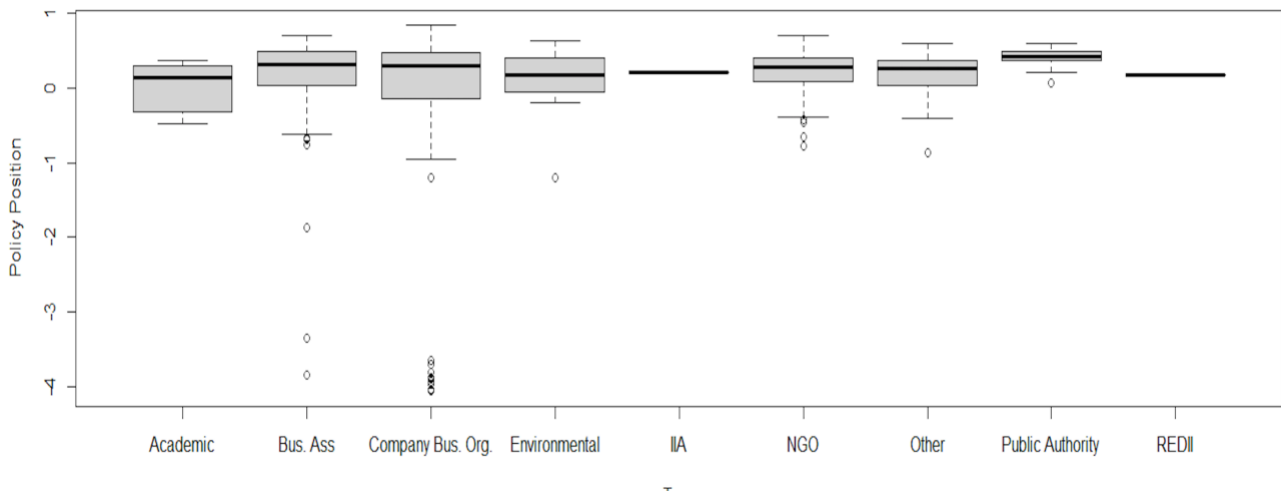


Figure 6.3 is the result of the estimated policy positions obtained by Wordfish. The boxplot shows the placement of the seven groups, the initial IIA, and the final legislative proposal by the Commission (REDII) relative to one another. All the policy positions are within -1.4 (wanting little to no revision) and 0.49 (wanting an ambitious revision). Examining the categories individually, they all have a positive median, and all but company/business organization have a positive mean (Appendix F). The company/business organization category is also the one with the widest interquartile spread, as the lower quartile is -0.14 and the upper quartile is 0.47. As they represent the interests of businesses on both sides of the continuum, it makes sense that they have the widest estimated policy positions, as some businesses will experience a higher demand for their services if the renewable energy targets increase, while others would be impacted negatively by renewable energy targets and decarbonization regulation. This is congruent with similar studies that have also found that policy positions display the consequences the legislation may have on the company's business activities (e.g. Klüver, 2013). However, on average, all interests support an ambitious revision of REDII. Especially considering that the average policy position of companies and business organizations is 0.31, whereas the initial communication from the Commission (IIA) is at 0.22.

Overall, the policy positions of all the types of interest groups are not that far away from each other. This indicates that there are some underlying mechanisms and norms in many European societies, where renewable energy and the green transition are viewed positively and of importance across political divisions (Youngs, 2021). This mechanism causes all interest groups to take some sort of positive stand on the topic both because it increases their ability to influence the final legislative proposal but also because it increases the legitimacy of their organization (Li, et al., 2016). The latter is because the Commission would never make the proposal too beneficial for companies benefitting from fossil fuels, as the Commission needs to always keep the EEI in mind to ensure that the legislation will be implemented later in the policymaking process (Ibid). Hence, this underlying mechanism pulls the interest representations as well as decision-makers into a more sustainable mindset, even if the primary activities of a specific business interest go against the green transition, such as using or producing fossil fuels. For instance, the combined airline company, Air France/KLM, has provided a position on the revision of REDII. While one might expect that their position would be rather negative and wanting as little revision as possible, their estimated policy position is positive at 0.09, i.e., confirming the underlying mechanism.

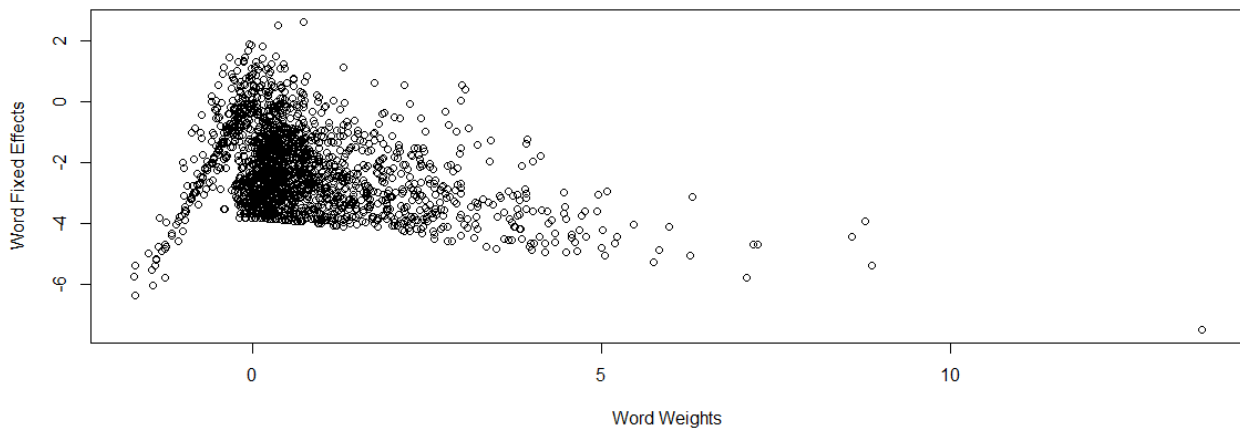
Interestingly, when comparing IIA and the final legislative proposal, REDII, there is a slight movement towards less ambition. As IIA's policy position is 0.22, the final REDII proposal has an estimated policy position of 0.18. This result is statistically significant, as the confidence intervals of the two policy positions do not overlap (appendix F). This suggests that while the final legislation does have a policy position with a higher level of ambition, the Commission must have been somewhat influenced by those that wanted less revision or influenced by the mechanism of having to take the EP and the Council into account. However, the Commission has evidently also been influenced by those wanting a higher level of ambition, or else they would not have a positive policy position.

Figure 6.3 Estimated Policy Positions on REDII



To ensure validity of the results, I made some random samples on some of the documents by carefully reading them and evaluating whether their places on the continuum made sense. This was done to ensure what Grimmer & Stewart (2013) refer to as “ideological dominance”, where the documents need to have a certain primary variation in the language or else the results are non-reliable (Ibid., p. 27). The samples validate that the intended dimension has been identified in most cases. Additionally, I tested the word parameters. As Wordfish estimates the policy positions based on the relative frequency of a single word, the positions are estimated by drawing on the weight of the used words, i.e., the parameter: β . This means that when the word weight is high, the word is relatively more important to how the estimate of the policy position turns out. On the other end of the word parameter are the word fixed effects. These, conversely, capture how much a word is used compared to other words, which is measured by the parameter: ψ . I.e., when words have a high fixed effect, it should not be part of the estimation because all the actors use them frequently. On the other hand, if a word has a low fixed effect, i.e., is not mentioned frequently, then it should be weighted more as it probably has a more relevant meaning. This means that the words that are used to estimate the policy positions of the documents are expectation to be of low word fixed effects and of high either positive or negative word weights (Klüver, 2013). Figure 6.4 confirms this expectation, as it has an “Eiffel Tower of Words” (Slapin & Proksch, 2008, p. 715), which is placed around a word weight of zero, meaning that words with high word fixed effects have a low word weight and vice versa.

Figure 6.4 Word Weights vs. Word Fixed Effects on REDII



Words with low word weight but high fixed effects are, e.g., “energy”, “eu”, and “emiss” in their stemmed version. This means that these are words are used a lot by the 317 documents but do not have a word weight, which makes sense, as these are common words to use in this context. In contrast, stems with high negative or positive word weights have very low word fixed effects. On the end of the scale where those wanting an ambitious revision are placed, stems such as “hot”, “pump”, and “cogener” have a high positive political connotation, which makes sense as these interests advocate for higher targets. On the other end of the scale are instead words like “unsound”, “industry-driven”, and “discontinuu” that have a negative connotation. Hence, this analysis of word weights and word fixed effects confirms the reliability of the results and that Wordfish has captured the correct ends of the policy space. Figure 6.5 shows an overview of the top words.

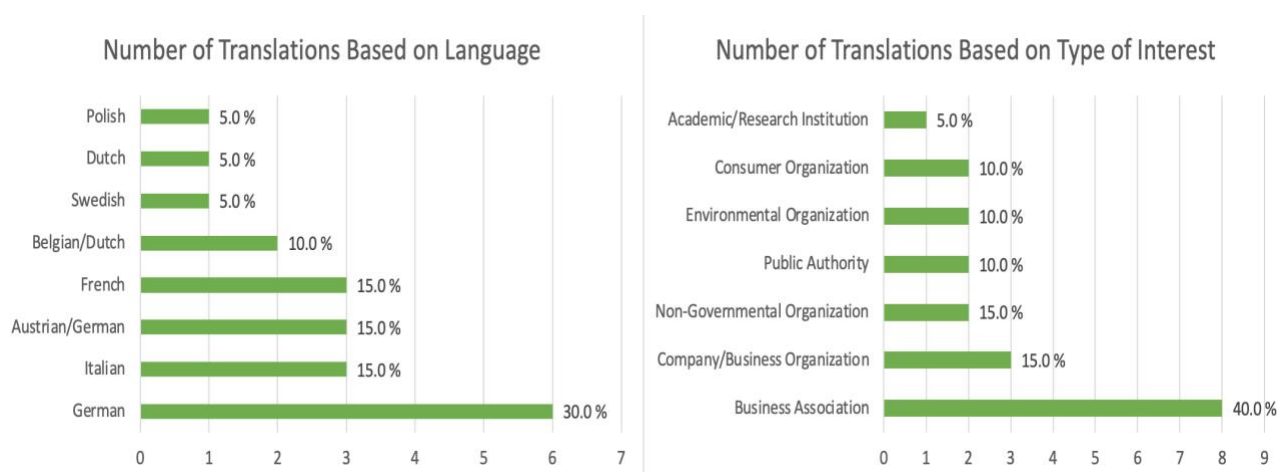
Figure 6.5 Top Word Weights and Word Fixed Effects on REDII

Top Word Weights: Ambitious	Top Word Weights: Cautious	Top Words of Highest Fixed Effects
hot	unsound	energy
water	anti-fraud	renew
twh	industry-driven	fuel
kwh	pan-eu	eu
cogener	discontinuu	use
renov	reintroduc	target
decentralis	flaw	sector
pump	last-minut	emiss
geo-therm	soft	direct
reus	complic	sustain

6.2.2 Quantitative Text Analysis of the Energy Efficiency Directive

Following the analysis of the policy positions of the feedback provided by interest representations on REDII, the same steps are repeated with the feedback on EED. 20 feedback responses were translated as they were submitted in other languages than English. Figure 6.6 provides an overview of the translated documents, which also had a majority of submissions in German (30 percent) and from business associations (40 percent). Once again, all anonymous documents were divided into a proper category, where most of these were from individuals and therefore rejected. Those few groups that had submitted identical responses have only been compiled into the data once.

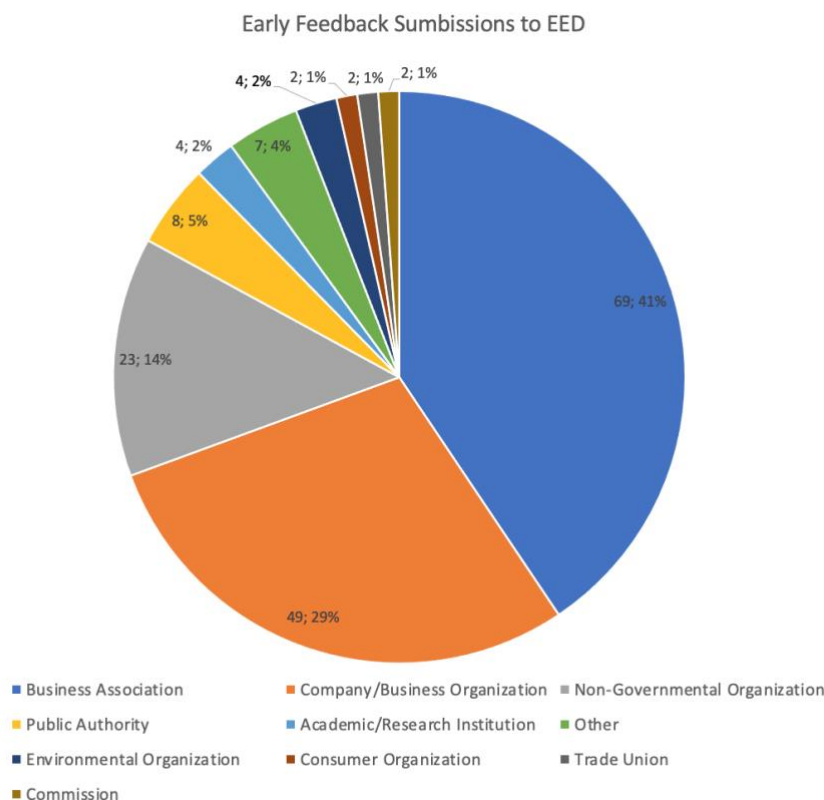
Figure 6.6 Number of Translations Based on Language and Type of Interest on EED



After cleaning all the documents, transforming, and compiling them into the right categories, the final number of feedback submissions came up to 167. This includes the initial communication by the Commission (IIA) and the final legislative proposal on the directive (EED). The submissions were compiled into the same categories as those examined in REDII as presented in figure 6.7. As there were only two submissions by consumer organizations and trade unions, respectively, these are compiled within the Other category, which consists of the same types of interest representation as on REDII such as working groups, taskforces, and European alliances. Lastly, the two opposing documents are implemented in Wordfish as a guide for what the two ends of the continuum represent. The positive end of the continuum, which represents those wanting to revise EED by implementing more ambitious targets, is Eurelectric, a business association with members within the electricity industry all over Europe (Eurelectric, 2022). On the other end of the continuum, which represents those interests that

want to revise EED as little as possible, the study used the policy position of Eurofuel, a business association, whose members are within the heating oil industry (Eurofuel, 2022). These two opposing policy positions have been found by first reading some random documents and evaluating these policy positions, followed by an initial Wordfish of all 167 documents. Then I analyzed the placement of these documents. If there were documents that had a stronger policy position towards one end of the continuum, not including outliers, they were selected instead.

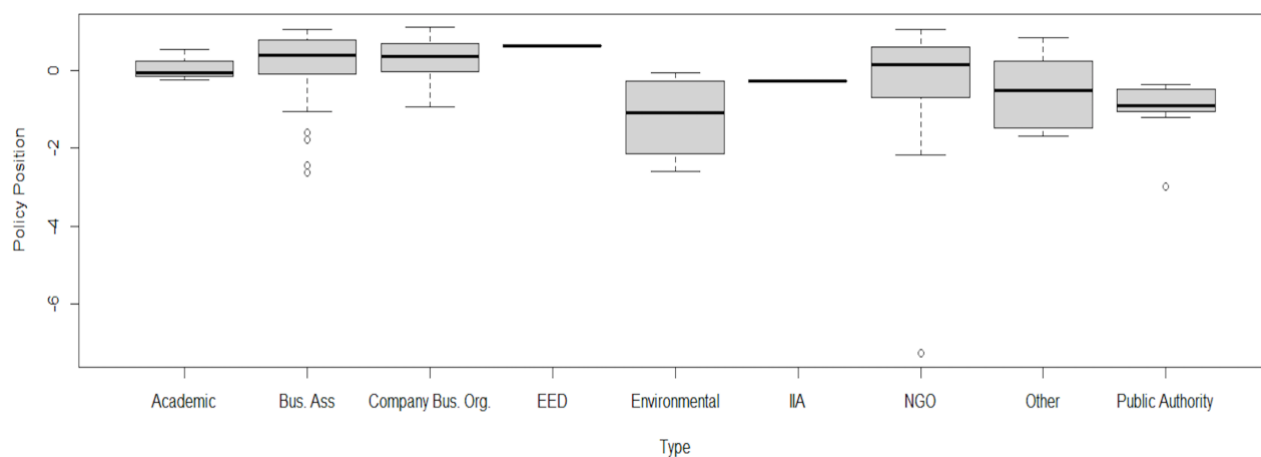
Figure 6.7 Overview of Early Feedback Submissions to EED



The results of the estimated policy positions obtained through Wordfish are presented in figure 6.8. The policy positions are placed around the middle of the continuum on average and are therefore relatively similar. The types of interest representation that have a positive median are business association, company/business organization, and NGO while those with a negative median are academic/research institution, environmental organization, public authority, and other. All groups with respectively a positive and negative median likewise have a respectively positive or negative mean. The only difference are NGOs and academic/research institutions, which have switched positions. Overall, the groups have an interquartile range of -1.9 and 0.76 (Appendix F).

The types of interest representation with most relevance for the Danish representation are other companies, business organizations, and business associations. Both groups have a positive aggregated policy position of respectively 0.36 and 0.39 and a first quartile that is negative. This means that these groups consist of both interests advocating for an ambitious revision and interests advocating for a cautious revision. This is the same result as in REDII, which makes sense as these two groups both have the highest number of samples and that the groups consist of both ends of the scale, i.e., business interests that live off fossil fuels and business interests that live off energy efficiency solutions. For instance, in one end we have the French oil company, Total, which has a policy position of -0.14. As this company's primary business activities are within the oil industry, it makes sense that they advocate for little revision, as an increase in renewable energy targets will be negative for their business, just like in Klüver's empirical study (2013). On the other end of the scale is the company, Schneider Electric, which has a policy position of 0.83. As their primary activity is to develop energy efficient technology for renewable energy infrastructure, it is in their interest to implement ambitious energy efficiency targets as their business would thrive on it.

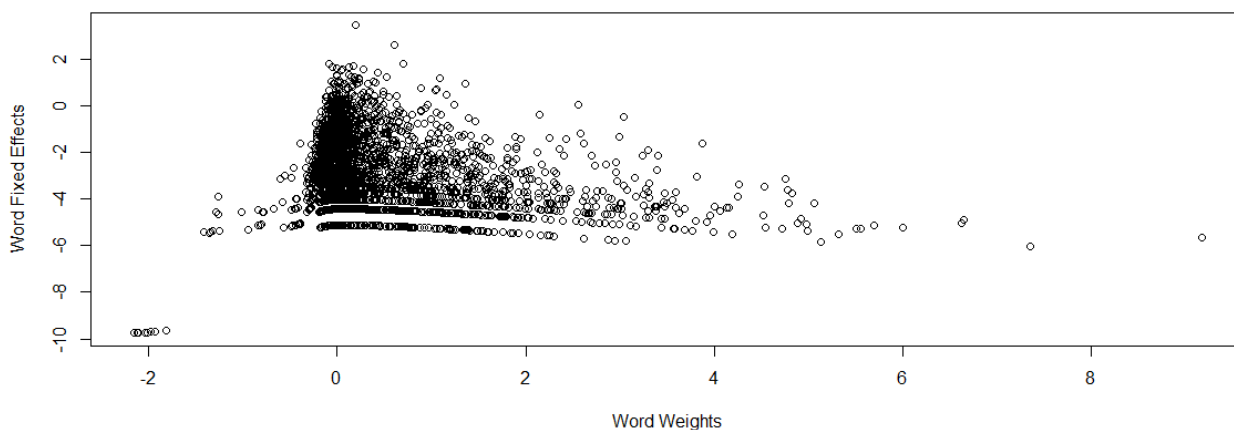
Figure 6.8 Estimated Policy Positions on EED



Turning to the policy positions of IIA and the final legislative proposal (EED), it is evident that interest representations managed to turn the final proposal more ambitious than what was initially proposed. As IIA has a policy position of -0.27, and the final legislative proposal has a policy position of 0.62, the most ambitious interest representations have been more successful in influencing the policymaking

than those wanting little to no revision. As the two policy positions do not have overlapping confidence intervals, the result is statistically significant (Appendix F). This indicates that business associations, companies/business organizations, and NGOs on average have been better at asserting influence on the Commission than the other types of representation. Further, it suggests that those in the third quartile generally have been better at asserting influence (Ibid.). This is in line with the underlying philosophy that there are causal structures and mechanisms at play, and especially in this case where the Commission wants the European population to view the institution as legitimate. They attempt to legitimize the Commission by making proposals that are later accepted in the Parliament and the Council relying on the political context and the public's view on the issue (Appendix I). Hence, as Europeans are interested in the green transition (Youngs, 2021), the proposal needs to reflect this or else the Commission would lose its legitimacy.

Figure 6.9 Word Weights vs. Word Fixed Effects on EED



Further, the validity of the Wordfish results is once again examined. Both by reading random samples of the documents and evaluating whether the estimated policy position makes sense (Grimmer & Stewart, 2013) but also the word parameters, and by comparing the word weights against the word fixed effects to ensure that the policy positions have been estimated based on the relevant words. As mentioned above, the assumption is that for the results to be valid, they should have a low word fixed effect and a high positive or negative word weight. Figure 6.9 confirms this expectation, as it also is an “Eiffel Tower of Words”. Examples of words with high word fixed effects but low word weights are “energy”, “EU”, and “climat”, which are used very frequently in the documents. This makes sense, as

all policy positions will have a focus on all three words due to the issue at hand. Hence, it should not discriminate between policy positions. Regarding stems with high positive word weights and low word fixed effects, i.e., those advocating for an ambitious revision are, e.g., “recharg”, “omit”, and “heat-pump”. Lastly, the stems with a high negative word weights and low word fixed effects, i.e., those advocating for little revision are, e.g., “judgement”, “illeg”, and “loser” (figure 6.10). This once again confirms the validity of the obtained results, as it makes sense that those advocating for more ambitious energy efficiency targets would emphasize it can be done, e.g., by using heat-pumps, where the other end of the scale uses more negative words to emphasize their point for why an ambitious revision should not be performed.

Figure 6.10 Top Words Weights and Word Fixed Effects for EED

Top Word Weights: Ambitious	Top Word Weights: Cautious	Top Word Fixed Effects
recharg	judgement	energy
omit	democra	effici
gni	farm	heat
heat-pump	autonom	build
electri	illeg	direct
priorit	licens	measur
heater	loser	state
hybrid	mistak	member
solarpow	mispercept	target
hybrid	un-treati	climat

The quantitative analysis of REDII and EED have some common findings. First, the medians of the groups are generally not distant from one another. Secondly, even though one would expect that the groups company/business organizations and business association would be the most cautious groups on revising the directives, the analyses have found that they generally are positive towards some form of revision. Further, the outliers of both directives have negative policy positions indicating that some interests are more interested in only advocating for their cause than trying to gain legitimacy of their interest. Moreover, the analyzed area, i.e., transitioning energy towards sustainability, is part of a discussion that has been going on for the past number of years, and which the EGD is a result of (European Commission, 2019b). This has created underlying mechanisms that slowly have been developed as more and more Europeans consider climate change to be the most serious problem worldwide (European Commission, 2021c). This means that the view of citizens, i.e., the independent

variable, indirectly impact how e.g., companies and business associations i.e., the dependent variable, act and obtain knowledge (Beach & Pedersen, 2013). This is because if the interests do not have the relevant knowledge and information that the Commission requires, they will not be able to access the policymaking process nor exert influence on the legislative proposal. Overall, the political environment is more supportive of an ambitious revision of the directive than vice versa. Hence, it is expected that Danish interest representation that is supportive of an ambitious revision will have a greater possibility of influencing the final proposals than one that supports a cautious revision, due to the lobbying coalitions.

6.3 Danish Interest Representation

Based on the previous analysis, it is evident that the context the Danish interests were a part of was mostly positive towards revising both directives. The following qualitative analysis will assess the Danish interests' positions. This sub-section starts out by conducting a DQLCA of the Danish interest representations' consultation and early feedback submissions to the Commission as explained in the methodology section (section 5). The chapters of this analysis will first analyze the Danish submissions to the feedback periods on REDII with a greater focus on the qualitative response as this provides more specific recommendations only made by that specific interest, thus enabling a more concise analysis of the ultimate influence (6.3.1). Afterwards, the same analysis will be conducted on the revision of the EED (6.3.2). This will be followed by an analysis of the lobbying strategies of the different types of Danish interest representation and whether they are in line with the theoretical expectations presented in the DQLCA codebook (6.3.3). Lastly, the analysis will compare the findings in the codebook of the DQLCA with the final adopted legislative proposals, and briefly examine any feedback provided by Danish interest after the final adoption to find whether Danish interests were able to influence the two directives (6.4).

6.3.1 The Renewable Energy Directive II

A total of 374 provided feedback to the early consultation on REDII. Of these, six were Danish interest organizations or companies (European Commission, 2020a). All the early Danish feedback submissions were between one and five pages in length. The open consultation on the revision of REDII was held from November 17th, 2020, until February 9th, 2021. This resulted in a total of 39,046 responses to the consultation. Of these, 38,400 (98.4 percent) were feedback from EU citizens. This consultation was structured around specific topics of the legislation (European Commission, 2021a). The questionnaire

that the Commission sent out contained 58 questions and more than 100 sub-questions or statements to evaluate (Ibid.) The questions were divided into three overall parts consisting of 1) General questions, 2) Technical questions on Transversal Energy System Integration Enablers, and 3) Technical questions on specific sectors (Desplechin, 2020). In the consultation part, out of a total of 638 feedback responses, 16 Danish companies or interest organizations contributed. Of these, three fit the criteria presented in section 5— Danfoss, DE, and DI (Ibid.)

Hence, the following analysis will examine the Danish interests' policy positions, access goods, supply and demand of access goods, and quantity, quality, and efficiency of the access goods concerning the first four questions of the DQLCA. The Directorate-General (DG) on the revision of REDII was DG ENER where Kadri Simson is the leading commissioner and the one that had the responsibility of the final adoption of the proposal (EUR-Lex, 2021). The Director General within the DG is Ditte Juul Jørgensen (DG ENER, 2022). Regarding the expertise of DG ENER within the green transition and energy system integration (unit 1), they have four subcategories consisting of 1) Renewables and energy systems, 2) Decarbonization and sustainability of energy sources, 3) Internal Energy Market, and 4) Infrastructure and Regional Cooperation (Ibid.). As there are only a few employees in each of these four categories, the level of technical and specified knowledge is, *ceteris paribus*, smaller than for a large company or business organization. Hence, the Commission's demand on access goods on especially EK is high, as the energy policy area is complex (Jefferson, 2000).

6.3.1.1 Danfoss

Danfoss is a multinational company based in Denmark. It has more than 40,000 employees worldwide and operates in more than 100 countries. Its primary focus is on climate and energy efficient solutions, developing energy efficient technologies both addressed to the consumer market and business market (Danfoss, 2022). Both of Danfoss' feedback submissions support an ambitious revision of REDII (Danfoss, 2020; European Commission, 2020). They argue that to reach the increased climate ambition, the share of renewables in the energy mix must increase (Ibid.). They provide specific recommendations on how to increase the share of renewables, as they recommend increasing the binding target for renewable energy from 32 percent to 40 percent (Danfoss, 2020; Directive (EU) 2018/2001, 2018, article 3), updating the current target of 14 percent for renewables in transport to 24 percent (Ibid., article 25), and counting the use of waste heat as a renewable (Ibid., article 23). Further, they recommend increasing the targets for use of renewables in the heating and cooling,

industry, and transport sectors, for instance through sector integration, and ensuring recovery of waste heat up to 800 TWh through a more efficient and circular energy system (Ibid.). The quantitative analysis finds that Danfoss has a policy position of 0.45. This is in line with these findings, as Danfoss supports an ambitious revision of REDII with a specified scope. This confirms that Danfoss has a position in the ambitious group of interests as presented in the quantitative analysis.

The specificity of their policy position suggests that their access good is EK. For instance, their understanding of industrial waste heat and the arguments to make buildings more energy efficient, because buildings today consume 40 percent of all energy consumed in Europe show that they have great insight in the technical side of the renewable energy area. This is undoubtedly a critical resource for the Commission, as such niche areas are not part of the knowledge, they have within DG ENER (DG ENER, 2022). Hence, Danfoss' high-level business activities have led them to a high provision of high quantity, quality, and efficiency of the access good, since Danfoss can provide the knowledge directly to the Commission. Hence, Danfoss' supply of the access good fits the demand of the Commission. Consequently, Danfoss' recommendations will be beneficial for their business activities. As they are manufactures of technologies that create renewable energy, an increase in binding targets for renewable energy in all sectors in all MS would increase the demand for their products and technologies according to Brunsgaard (Appendix M). This is in congruence with other empirical studies in the literature on lobbying for the benefit of business activities (e.g. Kinderman, 2015). Overall, the findings indicate that Danfoss is in favor of option 3 and 4, as they require a higher level of ambition as well as to amend REDII with regulatory measures within several sectors.

6.3.1.2 Danish Energy

DE, which today is part of Green Power Denmark, is a business organization with around 1,500 members throughout the green energy value chain. The organization represents all sorts of companies, owners, and developers within renewable energy and electricity (Green Power Denmark, 2022). DE supports and has specific recommendations for an ambitious revision of REDII (Danish Energy, 2020). They recommend increasing all renewable energy targets to at least 40 percent in line with the 2030 Climate Target Plan just like Danfoss recommends (Ibid.; Danfoss, 2020). They recommend a more interconnected energy system through targets on renewables in sectors that are not included in the emission trading system (ETS) such as the transport and industry sector, increasing the target for renewable energy in the transport sector to at least 24 percent in line with Danfoss,

raising the 1.3 percentage points annual increase of renewable energy in the heating and cooling sector, increasing the amount of renewable energy in “efficient” district heating and cooling (article 2), revising the definitions of different types of renewable energy, including renewable hydrogen, and developing a European system of certification for renewable and low-carbon fuels (Ibid.). The quantitative analysis estimates DE’s policy position to be 0.39, which places DE in a similar position as Danfoss and within the highly ambitious group of interests.

The analysis of the feedback submissions finds that DE’s access good also is EK, as they have a lot of technical knowledge on the use of renewables in electrification. This is evident, as they have information on e.g., the decline in cost of solar modules in Europe and the levelized cost of energy for offshore wind project (Danish Energy, 2020). Further, they also demonstrate that they understand the Commission’s Climate Target Plan, as they make several references to it to emphasize their own statements. Whether DE presents a critical resource and meets the demand of the Commission is debatable. On one hand, they have a lot of knowledge within electricity and can offer the Commission high quantity and quality of the access goods due to the extent of members they have that all have knowledge on this area. On the other hand, this knowledge is not unique considering the many power companies and bigger energy associations that has a lot of the same knowledge as DE. The efficiency of their access good is lower than for a company, because they need to consult with their members first. However, DE’s access good also entails output legitimacy as they have hundreds of members within the energy industry, which improves their critical resource to the Commission by offering some parts EK and some parts legitimacy, which is in line with e.g. Bouwen’s empirical study of legitimacy input and output in the Commission (2006). The feedback submissions suggest that DE is in favor of revising REDII through policy options 3 and 4, as they respectively argue for higher levels of ambitions on the share of renewable energy and that they want to amend article 2 by making stricter requirements for efficient district heating and cooling.

6.3.1.3 Confederation of Danish Industry

DI is a business and employer’s organization that represents 19,000 companies in Denmark. Their aim is to provide good corporate conditions for their members, and simultaneously advocate for an accelerated green transition ensuring a wealthy and competitive society (DI, 2022). DI supports a revision of REDII. However, opposite of Danfoss and DE, DI does not provide input to the revision other than recommending revising the biomass sustainability criteria of article 29 (DI, 2020). Their position in

the questionnaire correlates with the early feedback, as they support an ambitious revision within the buildings and transport sector but through cost-effective measures that do not impact industry, and they support the promotion of low carbon fuel, as opposed to the other Danish interests (DI, 2020; Danfoss, 2020; Danish Energy, 2020). The quantitative analysis estimates DI' policy position to be - 0.07. This correlates with the apparent difference from the other Danish interests and indicates that DI is less ambitious than anticipated. This presents an underlying mechanism of being reliant on the support from their members. As DI is subjected to the opinions of their members and represent companies in a variety of industries, they are not able to be as ambitious as DE and Danfoss, who will only benefit from higher renewable energy targets (Brunsgaard, Appendix M).

From the feedback submissions, DI does not make it clear to the Commission what their access good is. It is evident that they do have some EK on the field or else they would not have an opinion on some specific aspects of the directive, but this does not present a critical resource to the Commission. However, as DI is an umbrella organization with members from all over the Danish industry (DI, 2022), this lack of EK can be explained by their offering of legitimacy to the Commission which DI has as an organization with broad representation (Bouwen, 2006). Hence, DI may not be technical experts on the policy issue nor be able to offer a lot of EK, but they can provide a high quality and quantity of legitimacy efficiently. This is both a critical resource of the Commission as well as an access good of high demand, as found in other studies (e.g. Klüver, 2013; Bouwen, 2006), the Commission needs legitimacy to pass the legislation. However, some parts of the lobbying literature debunk this argument and have found that the Commission is biased towards specific interests and against diffused interests (Vikberg, 2019).

Figure 6.11 Results of the DQLCA on the Danish Interest's Feedback Submissions on REDII

Code Definition	Explanation	Danfoss	Danish Energy	DI
Characteristics of the Danish Policy Positions	<i>Whether the Danish interests recommends a revision, if the recommendation are specific and a certain topic or article, if the recommendation is more general in character, and what policy option they indirectly recommend.</i>	<ul style="list-style-type: none"> - Supports an ambitious revision - Specific recommendations on topics, sectors, and articles - In favor of policy option 2, 3, and 4 	<ul style="list-style-type: none"> - Supports an ambitious revision - Specific recommendations on topics, sectors, and articles - In favor of option 4 	<ul style="list-style-type: none"> - Supports a revision but not too ambitious - Only one specific recommendation on an article - In favor of option 4
Access Goods	<i>The access goods the Danish Interests offer the Commission.</i>	Expert knowledge	Expert knowledge/Somewhat legitimacy	Expert knowledge/Legitimacy
Supply and Demand of Access Goods	<i>Whether the Danish interest delivers a critical resource and if the supply fits the demand.</i>	<ul style="list-style-type: none"> - Critical resource by offering niche, technical knowledge - Supply fits the specific demand 	<ul style="list-style-type: none"> - Debatable whether they offer a critical resource to the Commission - Supply does not entirely fit the demand 	<ul style="list-style-type: none"> - Provides a critical resource to the Commission - Supply fits the demand of the Commission
Quantity, Quality, and Efficiency of the Access Good	<i>Whether the quantity, quality, and efficiency that the interest representation can provide fit the demand of the Commission and help fulfill their institutional role.</i>	<ul style="list-style-type: none"> - Offers high quantity, quality, and efficiency of their access good - Can help the Commission fulfil their institutional role 	<ul style="list-style-type: none"> - Offers high quantity and quality access good due to their members but no efficiency due to the extra layer of the representation - Can to some extent help the Commission fulfill their role 	<ul style="list-style-type: none"> - Offers high quantity, quality, and efficiency of legitimacy - Can help the Commission fulfill their institutional role

Shortly summarizing the findings of figure 6.11, it is evident that all the Danish interests to a smaller or larger extent have an access good to offer the Commission. Even though Danfoss and DE have a similar provision of access goods concerning all four components, Danfoss is better at providing a critical resource and offers a high supply of EK that is also of high quantity, quality, and efficiency. DE offers a critical resource, but the provision may not fit the demand, as other energy producers have first-hand EK at a higher scale. However, as they have 1,500 members only in the energy sector, they can provide an access good of both EK and legitimacy within that specific sector, which can increase their possibility for access. Lastly, DI positions itself differently from Danfoss and DE, as they in their provision of legitimacy are not as interested in supporting a too ambitious revision, because it will not be beneficial for all their members. All of this is in line with other empirical studies in the literature (Bouwen, 2006; Klüver, 2013; Kinderman, 2015).

6.3.2 The Energy Efficiency Directive

From the above sub-sections and the summary provided in figure 6.11, it is evident that Danish interests on REDII have similar positions on the revision but different strategies for gaining access to the Commission. This sub-section will conduct the same analysis, but this time on the Danish feedback on EED. The early feedback period for EED was also from August 3rd, 2020, until September 21st, 2020. In total, there were 189 responses to the revision of EED. Of these responses, six were from Danish interests. All feedback answers provided by Danish interests were between one and three pages in length. The consultative questionnaire on EED consisted of 61 questions and 174 sub-questions and were hence more comprehensible than the questionnaire of REDII. Conversely, only 344 interests answered the consultative questionnaire. The questionnaire consisted of two overall parts: 1) Questions of general nature and 2) Technical questions on specific articles of EED (CEER, 2021). The open consultation period was from November 17th, 2020, until February 9th, 2021. A total of nine Danish interests provided responses to the questionnaire. Those Danish interests that fulfilled the set criteria are 1) Danfoss, 2) DI, and 3) VELUX, and these will be examined.

The drafting and adoption of the revised proposal for EED was also conducted in DG ENER with Kadri Simson as the leading person. Reviewing the DG's expertise within energy efficiency (unit 3), they have five categories consisting of 1) Consumers, local initiatives, and just transition, 2) Energy efficiency, 3) Buildings and Products, 4) Energy security and safety, and 5) Innovation, research, digitalization, and competitiveness. All categories have few employees. This implies that the DG needs a lot of external expertise, especially considering that energy efficiency is a highly technical area (Hasselager, appendix L). Hence, the demand of the Commission on access goods is high.

6.3.2.1 Danfoss

Like their response to REDII, Danfoss supports an ambitious revision of EED to align with the EU's commitment of climate neutrality by 2050 (Danfoss, 2020). Danfoss emphasizes the importance of energy efficiency in the green transition and that it should be part of all EU energy and climate policies. Danfoss recommends binding and mandatory targets to get all actors and MS involved in energy efficiency and to secure energy efficiency across all sectors (Ibid.). Further, they propose ten specific recommendations on how the Commission should revise EED, such as increasing the energy efficiency target to 40 percent and make clear and aligned performance levels for energy efficient buildings across EU (Ibid.). Of all the feedback submissions by Danish interests on REDII and EED, this is the most

extensive. In total, they recommend amending seven articles (article 5, 6, 7, 9, 14, 16, and 17), all relating to issues that they can provide technical information on or are beneficial for their business activities (Ibid., European Commission, 2020). The quantitative analysis estimates Danfoss' policy position to be 0.7, which supports the findings of this analysis. This can be explained by the simple mechanism that if Danfoss gets the Commission to increase the energy efficiency target, the causal effect will be a future increase in their business activities, since their products concern energy efficiency, as the causal mechanism at play here is that ambitious targets will benefit some interests and disadvantage others (Beach & Pedersen, 2013).

Danfoss' access good is a high level of EK, even more so than their display of EK in REDII. This EK consists both of their technical knowhow, but also the specialized knowledge on the area of energy efficiency, which they have obtained as one of the global frontrunners of developing technologies to support energy efficiency (Danfoss, 2022). Since they have operations and factories all around Europe, they can provide the Commission with unique knowledge on how energy efficiency solutions can be implemented in all MS through their infrastructure. This presents a great critical resource for the Commission, as Danfoss can both specifically point out what needs to be changed to reach the 40 percent-target and how to do it, which indirectly represents IEEI as well. The high number of specific recommendations suggest that Danfoss offers the Commission high quantity and quality of their access good, and since they advocate for themselves, the access good is also easily accessible and efficient. Further, the high demand on knowledge puts Danfoss in a strong bargaining position to obtain influence on the legislative proposal. As Danfoss offers more knowledge on the area than is possible in less technical areas, and because the supply is not as extensive as on REDII, the Commission's demand is high. Further, as Danfoss is a global market-leader within energy efficient technology (Unitech International, 2022), the Commission is more willing to take their opinion into account as Coen (2007) has found in his empirical study. This increases Danfoss' bargaining power further. Moreover, if Danfoss is successful in making the final proposal of EED more ambitious, they will, *ceteris paribus*, have an advantage on the market and their business will expand, because their products contribute to a more efficient use of energy of heating and cooling of buildings (Danfoss, 2022). These findings suggest that Danfoss is in favor of implementing option 2, i.e., non-regulatory measures through information campaigns and option 3, i.e., a revision of EED.

6.3.2.2 Confederation of Danish Industry

DI's position in their feedback submissions on EED is shorter than the responses by other Danish interest representations, but more extensive than their responses to REDII. They support an ambitious revision of EED to reach climate neutrality by 2050 (DI, 2020). DI's recommendations are of a general nature such as an increase in deployment of energy efficiency solutions, an increase in electrification, and integration into more sectors (Ibid.). DI does have a few specific recommendations, as they advocate for an increased ambition of at least 55 percent use of renewable energy, by means of energy efficiency such as increased electrification and higher targets in more sectors, making ETS a key player for more ambitious climate targets by, e.g., including the transport sector and buildings, and further amending article 4 on how to calculate energy efficiency (Ibid., Brunsgaard, Appendix M). In the current EED, increasing energy consumption is considered negative no matter if the energy consumption increases due to the production of renewable energy source or fuel, which they want to change by making the legislation more flexible (Brunsgaard, Appendix M). The same observations are made in the questionnaire, where all revisions are under the condition of cost-effective measures and that they should not limit industrial production (European Commission, 2021d). The quantitative analysis estimates that DI's policy position is -0.22, which is in congruence with the lack of specificity in their feedback submissions. However, this lack of specificity may also be because part of DI's strategy is to be compromise seeking and not make too ambitious recommendations, as they risk not gaining influence (Dionigi, Appendix I). It further indicates an underlying mechanism that as umbrella organizations need the acceptance of members in various sectors, the level of ambition needs to be adjusted accordingly. This is confirmed in the interview with Brunsgaard (Appendix M), but difficult to find in the lobbying literature.

Once again, DI's access good is a combination of primarily legitimacy and secondary EK. The EK is, e.g., evident in their attached report, which identifies recommendations on the potentials of energy efficiency, as well as their great knowledge on the interconnectedness of different directives and legislation such as the interplay between EU ETS, EED, and REDII as key priorities in the green transition of EU. This is also confirmed in the interview with Brunsgaard (Appendix M), as he emphasizes that their technical knowledge and knowhow within the green transition was the most important aspect to gain access to the Commission, even though the Commission itself has a lot of technical knowledge. DI does present a stronger critical resource to the Commission on EED than REDII, as their level of EK is higher at this directive and they offer the same amount of legitimacy,

which meets the diverse demand of the Commission. Hence, especially the efficiency and quality of their access is high, where the quantity is debatable. The above suggests that DI prefers policy option 3 on amending and making EED more ambitious. Further, DI recommends policy option 2 on a revision of the part of EED related to finance, guidance, and training.

6.3.2.3 VELUX

The last Danish interest representation of relevance on EED is VELUX. VELUX is a multinational company with presence in over 40 countries and more than 10,000 employees worldwide. VELUX produces windows with high energy efficiency, which improve the indoor climate. They have increased their product portfolio to include projects with sustainable and healthy buildings (VELUX, 2022). VELUX supports an ambitious revision of EED, by increasing the energy efficiency target to at least 40 percent, which is in line with Danfoss (VELUX, 2020; Danfoss, 2020). Like the other Danish interests, they argue that energy efficiency is a key component to reaching climate neutrality, that the Energy Efficiency First Principle should be part of all policies within the climate area, and that more sectors should be included in EU ETS and have synergies with REDII (European Commission, 2021d). Furthermore, like Danfoss, VELUX also argues in favor of binding energy efficiency targets both at the EU and national level. VELUX only has two specific recommendations to article 7: Increasing the annual target for energy savings obligations, and that eligible measures for delivering final energy savings should be in accordance with the Energy Efficiency First principle (VELUX, 2020). VELUX's estimated policy position in the quantitative analysis is 0.26. This supports the analysis of Danish contributions to EED, as Danfoss has the highest rated policy position, which is in line with their extensive feedback submissions. Second is VELUX, which will experience expanding business activities with higher energy efficiency targets (VELUX, 2022). Last is DI, which does not have specific knowledge or benefits of revising EED, hence, in line with the causal mechanisms presented in the Danfoss- and DI-chapters.

VELUX provides a high degree of EK on the area of energy efficiency and especially within the buildings sector. They emphasize that it is important to have a strong focus on this sector both due to the energy aspect, but also in particular due to the health and environment aspects of energy renovations of buildings (VELUX, 2020). This refers directly to their business activities, which are within energy efficiency in the building sector (VELUX, 2022). They further stress the importance of this sector, and indirectly their business, by stating that the focus of building renovation will create 3.15 million new jobs just in the buildings sector and 9 million new jobs in total (VELUX, 2020). Their very technical expertise in the building sector is somewhat of a critical resource to the Commission, as VELUX can in

detail help provide solutions for socio-economic benefits. Further, VELUX evidently can provide a high quality and efficiency access good, but the quantity may not meet the demand of the Commission, as their knowledge may be too specific, regarding windows and the like (Taminiau & Wilts, 2006). VELUX's recommendations all relate to policy option 2 and 3 by making an ambitious revision that should be accompanied by specific non-regulatory measures.

Figure 6.12 Results of the DQLCA on the Danish Interest's Feedback Submissions on EED

Code Definition	Explanation	Danfoss	DI	VELUX
Characteristics of the Danish Policy Positions	<i>Whether the Danish interests recommend a revision, if the recommendations are specific and a certain topic or article, if the recommendation is more general in character, and what policy option they indirectly recommend.</i>	<ul style="list-style-type: none"> - Supports an ambitious revision - Specific recommendations on topics, sectors, and articles - In favor of policy option 2 and 3 	<ul style="list-style-type: none"> - Supports a revision but not too ambitious - General recommendations with a few specific ones too - In favor of option 2 and 3 	<ul style="list-style-type: none"> - Supports an ambitious revision - General recommendations and one specific - In favor of option 2 and 3
Access Goods	<i>The access goods the Danish Interests offer the Commission.</i>	Expert knowledge and IEEI indirectly	Expert knowledge/Legitimacy	Expert knowledge
Supply and Demand of Access Goods	<i>Whether the Danish interest delivers a critical resource and if the supply fits the demand.</i>	<ul style="list-style-type: none"> - Critical resource by offering technical knowledge and how to implement it in all of EU - Supply fits the specific demand 	<ul style="list-style-type: none"> - Offers a twofold critical resource - Supply fits the demand of the Commission 	<ul style="list-style-type: none"> - Debatable whether they offer a critical resource to the Commission - Supply does not entirely fit the demand
Quantity, Quality, and Efficiency of the Access Good	<i>Whether the quantity, quality, and efficiency that the interest representation can provide fit the demand of the Commission and help fulfill their institutional role.</i>	<ul style="list-style-type: none"> - Offers high quantity, quality, and efficiency of their access good - Can help the Commission fulfill their institutional role 	<ul style="list-style-type: none"> - Offer high quality, quantity, and efficiency of their access good - Can help the Commission fulfill their institutional role 	<ul style="list-style-type: none"> - Offers high quality and efficiency of access good but not quantity - Can to some extent help the Commission fulfill their role

The results of the DQLCA on the Danish responses to EED are summarized above. These results are similar to those of the analysis on Danish responses to REDII. Danfoss is once again ambitious, specific in its recommendations and offers a high quantity, quality, and efficiency of their access good. Further, as Danfoss is a global leader within energy efficient technology, they also provide IEEI, as they can help the MS implement a higher degree of energy efficiency. DI offers legitimacy as their access good, and hence, is not specific on ambitious recommendations just like with REDII. VELUX, however, is the only one of the Danish interests that does not provide a fitting supply of access good, as their responses are

very similar to DI but without the ability to offer the Commission legitimacy. Hence, the results on the first part of DQLCA suggest that VELUX will be the Danish interest that will be the least successful in gaining influence on the Commission, and due to the need for specificity, Danfoss will be the most successful in both directives (Vikberg, 2019). Moreover, it should be noted that almost all the Danish interests have a lot of knowledge concerning IDEI. Nonetheless, their feedback submissions do not present this knowledge, which suggests that they are aware that the Commission is not interested in information on national interests, but rather are interested in technical expertise in the area or IEEI (Bouwen, 2004). This observation is in line with the theoretical argument that the Commission's critical resource is EK.

6.3.3 Lobbying Strategies

The above part of the analysis has examined the strategies used by Danish interest representation for gaining access to the Commission. Their strategies were found by analyzing their feedback and consultation submissions to find their policy positions on the revisions of REDII and EED, which are summarized in figures 6.11 and 6.12. However, while consultation feedback can be used to show the level of ambition of the interests (Hasselager, Appendix L), it does not cover the whole explanation for how and why interest representation can influence the Commission's adopted legislative proposals (Dionigi, Appendix I; Mortensen, Appendix J). Hence, the following section examines the lobbying strategies of the same Danish interests as analyzed above. These Danish interests will be examined to determine the chosen type of interest representation, the primary types of lobbying, provision of access, and lobbying coalitions as presented in the second half of the DQLCA codebook.

6.3.3.1 Danfoss

When examining the type of interest representation that Danish interests engage in, their organizational form is assumed to impact this decision as well as the success of the lobbying efforts. First, the size of the company matters. Danfoss has 40,000 employees, is a global leader within engineering technologies on energy efficiency, has sales in more than 100 countries, and owns 95 factories across more than 20 countries (Danfoss, 2022). Hence, they are large enough to succeed in obtaining access and influence by themselves, which is why it makes sense that Danfoss engages in individual firm lobbying. This is also confirmed by the high degree of economic power they can provide to the Commission, as they control business investments in terms of their vast business operations,

provide jobs to 40,000 people worldwide, and have lobbying expenditure for just the Commission between 400,000 and 499,999 euros annually (European Commission, 2022d).

As Danfoss is a large multinational company, they should have an office in Brussels to be close to the EU policymaking, as any legislation can have negative consequences for their economic strategy. The trade deal between the UK and the EU is an empirical example of how legislation can impact the economic strategy of a business (Thomas-Bryant, 2021). However, since late 2021, Danfoss no longer has an office in Brussels (European Union, 2022a; LobbyFacts, 2021). Even though an office may seem irrelevant, when they are represented in offices in Brussels through their memberships in European organizations such as European Alliance to Save Energy (European Union, 2022a) and national organizations such as DI and DE (Danfoss, 2022), the literature emphasizes the great importance of an office in order to gain influence (Shotton & Nixon, 2015). The domestic institutional environment, which is the same for all the Danish interests, incentivizes them to engage in direct lobbying action at the European level, as it is easy for business interests to gain access to the Danish government (Brunsgaard, Appendix M), there are a low level of state controls on company and interest affairs in EU (Freedom House, 2021), and lobbying is not perceived negatively in Denmark. What decreases the incentive for Danish Interests to engage in individual action, is that Denmark has a high number of national associations that can protect and project their interests (Denmark.dk, 2022). However, this also makes way for a multi-channel approach of being represented by as many different channels as possible to have many opportunities of gaining influence, as evident in the case of Danfoss.

Turning to the types of lobbying, Danfoss makes use of formal, direct, and inside lobbying. They go through the formal channels to show their great knowledge in the area, their level of ambition, and they succeed in offering both a sufficient quantity and quality of their access good. Further, they have a former EU Commissioner, Connie Hedegaard, on their board (Danfoss, 2022), which Luechinger and Moser's (2020) empirical study finds is a benefit to obtain influence. They engage in direct lobbying through their membership in EU-ASE, which has held 10 meetings with both Director-Generals and Commissioners pertaining to their members' position on EED and REDII (EU-ASE, 2022). EU-ASE has also provided feedback on the directives (European Commission, 2021b). Moreover, as a considerable part of all interests had a similar position on both directives as Danfoss, they are indirectly part of an ambitious lobbying coalition, and more directly also through their memberships of alliances. Outside lobbying is not a primary means for Danfoss, which can decrease their ability of influence, as they do

not try to gain direct citizen support but have their own interests in mind. The same is found of their use of informal lobbying. As they do not have an office in Brussels, it is difficult to gain a trustful relationship with the Commission, as it requires presence (Dionigi, Appendix I; Mortensen, Appendix J; Brunsgaard, Appendix M). Nor have Danfoss themselves had any meetings with the Commission pertaining to neither EED nor REDII (Transparency International EU, 2022). Hence, Danfoss' strategy is to provide a high quantity and quality of EK through formal and inside lobbying, lobby coalitions, their multi-channel approach by engaging in individual action, and collective action at the EU level through their membership of European and national business associations. Nonetheless, the greatest part of their focus is on the components pertaining to their access good (figure 6.11 and 6.12).

6.3.3.2 VELUX

As evident from the first part of the DQLCA, VELUX engages in individual action, as they by themselves have provided consultative responses to REDII. VELUX can do this due to their large company size, 10,000 employees worldwide, their operations and sales in more than 40 countries, and their big business with a turnover of 22.6 billion kroner in 2020 (VELUX, 2022; Finans; 2022). Hence, VELUX has both vast economic power, information, and EK within energy efficiency, as their own critical resource is producing windows with high energy efficiency. Their economic power is further increased as they create jobs, and they control valuable business investments through, e.g., the VELUX Fund (VELUX, 2022). Their economic strategy is impacted by their ambitions of engaging in international operations, making them dependent on EU legislation (Thomas-Bryant, 2021). Hence, VELUX should prioritize using a lot of resources on lobbying the EU institutions for their own benefit. Their strategy on this point contradictory, as they do have an office in Brussels with two fulltime employees but do not spend more than 50,000 euros on lobbying activities (European Commission, 2022e), which decreases their success of direct lobbying (Dionigi, Appendix I). However, as they are members of national associations such as DI that also has an office in Brussels and promotes interests on their behalf, as well as several European associations, e.g., the European Alliance of Companies for Energy Efficiency in Buildings (EuroACE) and the European Council for an Energy Efficient Economy (ECEEE) a great part of their lobby strategy is to gain influence through the lobbying efforts of their alliances (Klüver, 2013). These alliances have held more than 10 meetings with Commissioners, DG's, etc. (European Commission, 2022d). Further, some of these alliances, for instance, ECEEE, are also members of other European alliances (Ibid.), which on one hand makes it harder to provide an efficient access good, but on the other hand increases citizen support and VELUX's possibility of influence through multiple

channels and lobby coalitions. Moreover, EuroACE is also part of The Energy Efficiency Financial Institutions Group and The Sustainable Energy Investment Forums, which are both run by DG ENER (Ibid.). Hence, VELUX can indirectly assert influence on the legislative process through their membership of EuroACE.

VELUX's lobby strategy consist of inside lobbying with both formal and informal elements. The inside formal lobbying exerts itself in their feedback submissions to the formal channels, just like Danfoss. By submitting feedback responses to all the consultations on EED, VELUX shows their vast knowledge on the subject that both the Commission and later the Parliament can make use of, even though they have not been part of an expert group on any of the directives (European Union, 2022; Mortensen, Appendix J). The informal part of the direct lobbying is to be present. Like all interviewees emphasized, presence, network, and informal meetings with other stakeholders greatly impacts how much influence the respective interest can obtain on the policymaking process (appendix I-M). Hence, it is beneficial for VELUX to have an office in Brussels with employees whose primary assignment is to set up meetings and engage with EU institutions, which is also supported in the literature (Shotton & Nixon, 2015). It further strengthens their influence that they have had this office for nine years (European Union, 2022a), as it has enabled VELUX to hold three official meetings with the Commission pertaining to EED due to their long-term relations (Dionigi, 2017; Dionigi, Appendix I). Conversely, the use of outside lobbying/contentious politics is not present in VELUX's lobbying strategy. They focus on promoting and offering the access good of EK with a high quality through means of direct lobbying.

6.3.3.3 DI

DI's lobby strategy is different from the two strategies used by Danfoss and VELUX. As DI's primary activity is to represent the interests of their members, they do not engage in individual action, as they do not promote their own interests. Rather, by nature of their organization, they make use of collective action (Barber, Peirskalla, & Weschle, 2014). DI is a national business organization; hence they inherently have IDEI as an access good. However, as DI knows that the Commission is not interested in IDEI (Klüver, 2013), their strategy is instead to promote their access good as both EK and legitimacy on behalf of their members. Generally, many Danish companies choose to engage indirectly in lobbying strategies through the collective action conducted by their business association (ECON, 2005). As both Martinussen, Mortensen, and Hasselager mention, it can especially for smaller companies be beneficial to outsource the lobbying activities to organizations, as lobbying is a resource-

intensive activity (Appendix K, J, and L). For instance, Martinussen emphasizes that if they were not part of Danish Shipping, they would not engage in lobbying at all. Because of their small size, engaging in individual lobbying activities is not a possibility for them (Appendix K).

However, the findings of the DQLCA of the Danish interests' feedback responses on REDII and EED show that DI has not made extensive responses to either of the directives, and that this impacts both the quantity and quality of the access good that they can offer the Commission. On the other hand, as DI has more than 19,000 members, which also include highly influential companies with large economic power and information resources, DI's strategy to obtain influence on the policymaking is rather the great economic power, citizen support, and legitimacy behind their organization. Further, DI is the Danish interest that by far uses the most resources on lobbying the Commission, as their annual expenditure is between 1,250,000 and 1,499,999 euros (European Union, 2022a), indicating the importance for their members that DI is present in the EU policymaking, since the final legislation potentially can have extensive consequences on their business activities. Further, the possibility of influence on legislation increases with the amount of expenditure as found in several empirical studies (e.g., Kang, 2016; Stevens & De Bruycker, 2020).

DI is member of 20 European associations including BUSINESSEUROPE (European Commission, 2022d). This is a substantial part of their strategy, as DI knows that the interests of Danish businesses may not be of great importance in the grander scheme, but by cooperating and asserting influence on the position of BUSINESSEUROPE and other big European associations, DI can indirectly influence the final policy proposals through the lobbying efforts of their European counterparts, as they typically are part of the Commission's expert and consultative entities (Dionigi, Appendix I; Brunsgaard, Appendix M; European Commission, 2022f). When reviewing their feedback responses, it is debatable whether DI is part of the same lobbying coalition as Danfoss and VELUX, as they do not assert a very ambitious position on the revision of EED and REDII. However, as prevalent in the quantitative analysis, a lot of interest representation was placed around the middle, i.e., wanting some revision but not too ambitious. Hence, DI is a part of a less ambitious lobbying coalition than Danfoss and VELUX.

The last part of their lobbying strategy is what type of lobbying efforts they engage in to obtain influence. In congruence with Danfoss and VELUX, DI primarily makes use of direct, formal, and informal lobbying as part of their strategy by providing feedback through the formal channels.

Moreover, their feedback submissions suggest that DI have submitted these to show their members that they have taken a position on the members' behalf and to show the Commission that they are interested in providing feedback, which can be part of a lobbying strategy as Mortensen also has emphasized (Appendix J). Further, DI has an office in Brussels with two fulltime employees, whose responsibilities are to ensure contact to the EU civil service (Brunsgaard, Appendix M), which has been proved in the literature to be an important part of the informal lobbying to obtain influence (Hayes-Renshaw, 2009). Nonetheless, even though DI participates in meetings with the Commission, none of them concern the energy directives (European Commission, 2022d). Hence, their strategy for influence is primarily through their memberships in European associations. This strategy is valid, as e.g., BUSINESSEUROPE has had no less than 28 meetings with Commissioners, Director-Generals, or Members of Cabinets on EGD between 2019 and now (BUSINESSEUROPE, 2022). Hence, they provide a political exchange in the form of social content to the Commission by supporting the position of BUSINESSEUROPE. DI is part of Commission expert groups, but neither of them concern EED, REDII, nor the EGD in general (European Commission, 2022d). Lastly, DI's overall lobby strategy also has an element of outside lobbying. This does not mean that they mobilize the public in the same way that NGOs have done on e.g., REDII, where they got 38,000 citizens to sign a petition for removing biogas as a renewable resource (DG ENER, 2021). Rather, they do it by giving opinions on legislation in the media, providing the population with information on consequences of legislation, creating reports to the public, etc., which is validated as a vital source of influence in the lobby literature (Eising, 2004). Hence, DI's lobbying strategy is primarily on these components of the theoretical framework, whereas the first four components are only a part of their strategy to a lesser extent.

6.3.3.4 Danish Energy

As DE also is a business organization that represents the interests of their members, their lobbying strategy is similar to DI's. As they engage in collective action and are a national organization, they by default have a primary access good on IDEI (Bouwen, 2004). However, DE has been better than DI at offering EK to the Commission. As all their members are within the energy industry, it enables them to obtain great specific and technical knowledge within the area of sustainable energy (Danish Energy, 2020). Their feedback submissions show knowledge on especially electrification, indicating that they can speak on behalf of their members, because the institution itself is so knowledgeable (Ibid.). Conversely, DI has 19,000 members divided between all kinds of companies within the industry sector, including companies that are also member of DE (for instance, Ørsted and Danfoss). Hence, DE has an

advantage when trying to obtain influence on this area, as they themselves have a high amount of EK, and it is confirmed in the literature that different interests need different levels of expertise (Jenkins & Mulcahy, 2018). On the other hand, DE spends between 200,000 to 299,999 euros annually on lobby expenditures, which is low compared to the other Danish interests. Hence, DE also uses other measures to influence policymaking e.g. through their memberships in European alliances such as Eurelectric, the European Energy Forum, and the European Heat Pump Association (European Commission, 2022d).

DE, like the other Danish interest representations, makes use of inside lobbying with both a formal and informal aspect as part of their strategy to obtain influence. The formal inside lobbying consists of the formal feedback submissions, where they try to assert a specific and high quality EK. Further, DE participates in meetings with Commissioners either by themselves or through their membership in various European Associations (Ibid.). For instance, they have held two meetings with a Cabinet member of Frans Timmermans in relation to EGD priorities, and a meeting with Director-General of Energy, Ditte Juul Jørgensen, on decarbonization efforts (Danish Energy, 2022). However, just through Euroelectric, they have had an influence on and through more than 20 meetings with the Commission on EGD (Ibid.), confirming the benefit of membership in European associations (Eising, 2004). Further, as DE has had an office in Brussels for several years (LobbyFacts, 2021), they are also able to make use of informal inside lobbying through trustful relationships with the legislators and Members of Cabinet, which increases the possibility of influence (Dionigi, 2017). This is also a point that Brunsgaard has made—over the years, the employees in the Commission get to know your organization and what your interests are, making it easier to assert influence (Appendix M). Further, DE can assert political exchange as they have great niche knowledge on the topic of renewable energy and energy efficiency. DE is part of the most ambitious lobbying coalition, as their goal is a complete electrification of EU. Lastly, DE uses outside lobbying, like DI does, by writing opinions in newspaper, making press releases, and being present on social media to achieve citizen support on their work to achieve an ambitious green transition (Green Power Denmark, 2022), which empirical studies have found to improve the level of influence (Weiler & Brändli, 2015).

Figure 6.13 Results of the DQLA on the Danish Interests' Strategies to Gain Influence

Code Definition	Explanation	Danfoss	DI	Danish Energy	VELUX
Types of Interest Representation	<i>What interest representation the Danish interests use and whether the type of interest representation depends on the organizational form.</i>	<ul style="list-style-type: none"> - Multi-channel approach - Goes beyond the organizational form 	<ul style="list-style-type: none"> - Representation through their own lobbying and their membership in European associations - Dependent on the organizational form 	<ul style="list-style-type: none"> - Representation through their own lobbying and their membership in European associations - Dependent on the organizational form 	<ul style="list-style-type: none"> - Multi-channel approach - Goes beyond the organizational form
Types of Lobbying	<i>Whether the Danish interests primarily make use of direct lobbying and political exchanged as assumed in the theoretical framework.</i>	<ul style="list-style-type: none"> - Makes use of inside, direct, and formal lobbying - Does not have an office 	<ul style="list-style-type: none"> - Makes use of inside, direct, formal, informal lobbying, political exchanges, and outside lobbying - Does have an office in Brussels with two fulltime employees 	<ul style="list-style-type: none"> - Makes use of inside, direct, formal, informal lobbying, political exchanges, and outside lobbying - Does have an office in Brussels with two fulltime employees 	<ul style="list-style-type: none"> - Makes use of inside, direct, formal, and informal lobbying - Does have an office in Brussels with two fulltime employees
Provision of Information, Economic Power, and Citizen Support	<i>Whether the Danish interests provide information, economic power, and citizen support to the Commission.</i>	<ul style="list-style-type: none"> - Provides information and economic power but not citizen support to the Commission - Annual lobbying expenditure of 400,000-499,999 euros 	<ul style="list-style-type: none"> - Provides information, economic power, and citizen support to the Commission - Annual lobbying expenditure of 1,250,000-1,499,999 euros 	<ul style="list-style-type: none"> - Provides information, economic power, and citizen support to the Commission - Annual lobbying expenditure of 200,000-299,999 euros 	<ul style="list-style-type: none"> - Provides information and somewhat economic power but not citizen support to the Commission - Annual lobbying expenditure of 10,000-50,000 euros
Lobbying Coalitions	<i>Whether the Danish interests are a part of a large lobbying coalition.</i>	<ul style="list-style-type: none"> - Part of the highly ambitious lobbying coalition, which can cooperate with the ambitious coalition 	<ul style="list-style-type: none"> - Part of a less ambitious lobbying coalition that includes more interests 	<ul style="list-style-type: none"> - Part of an ambitious lobbying coalition 	<ul style="list-style-type: none"> - Part of the highly ambitious lobbying coalition, which can cooperate with the ambitious coalition

In summary, these four Danish interest representations have different lobbying strategies to obtain influence. The two companies, Danfoss and VELUX, make use of similar lobbying strategies, as they use the multi-channel approach by engaging in individual action and collective action at the national and EU level, and hence offer EK through as many channels as possible. This is in line with the findings of e.g., Boessen and Maarse's (2009) empirical study on the role of interest groups in the tobacco industry. Conversely, DI and DE make use of national collective action through their own work and European collective action through memberships. All the Danish interests use inside and formal lobbyism, where there is a difference in the use of informal, outside lobbyism, and political exchanges, which is different from other empirical studies that emphasize the importance of different types of

lobbying to gain influence (Dionigi, 2017; Nothhaft, 2017). They all provide information and economic power in some sense, while only the business organizations provide citizen support. All the Danish interests are part of a lobby coalition but with different levels of ambition. All of this is summarized in figure 6.13. None of the Danish interest groups or companies have engaged in third party representation, as Danfoss and VELUX have enough resources to do it by themselves and DI and DE already do it on behalf of their members, hence another layer may negatively impact the quality of the provided access good (Bouwen, 2004).

6.4 The Commission's Final Legislative Proposals and the Lobbying Successes of Danish Interests

Knowing the elements of the initial IIA's, the overall political context and attitudes towards the revision of REDII and EED, as well as the positions and strategies of Danish interests on how to obtain influence on the policymaking process, I now turn to how the final legislative proposals for both directives turned out. The focus of the two final proposals will be on the issues, measures, and articles that the Danish interests wanted to implement in the proposals and whether they were successful in doing so. This will also briefly be compared to the feedback Danish interests provided after the final adoption to examine whether they view their lobbying efforts successful.

The final proposal for a directive on REDII from the Commission is 56 pages in total. As we know from the quantitative analysis, the policy positions on REDII leaned towards an ambitious revision of REDII. All the Danish interests advocated for an increase in renewable energy targets from 32 percent to a minimum of 40 percent. This has been implemented in the proposal (article 3). As the Climate Target Plan proposed to increase it between 38-40 percent, interests such as the Danish ones were successful at asserting influence to increase the target further. Reviewing the specific recommendations from Danish interests Danfoss recommended implementing waste heat as a renewable within heating and cooling in article 23. This has been accommodated by the Commission, as MS now can assess their potential for using waste heat as a renewable energy source. What Danfoss nor DE have not obtained influence on, is increasing the share of renewables in the transport sector from 14 percent to a minimum of 24 percent (article 25). Instead, the GHG reduction target is increased to 13 percent. Hence, Danfoss has been somewhat able to influence the final proposal, but other interests have evidently been more successful.

DE recommended implementing a more ambitious target than the annual 1.3 percentage increase of renewable energy in the heating and cooling sector (article 23). While Danfoss' recommendation was fully accommodated in article 23, DE's has been partly accommodated, as the target for MS that use waste heat and cold will increase by 1.5 percentage points. For those MS that do not use waste heat, the target will increase by at least 1.1 percentage points, which is more ambitious than the current REDII, where the 1.3 percentage points are merely indicative. However, the new proposal does not have any specification of how much waste heat that can be recovered, where Danfoss argues for up to 800 TWh. The last of DE's specific recommendations was to include more renewable energy in the term of "efficient" district heating and cooling (article 15). This has been accommodated by the Commission by inserting a new article 15a, which refers to EED's new definition of efficient district heating. Lastly, DI, only had one specific recommendation, which was to revise the biomass sustainability criteria (article 29). This has been partly accommodated by the Commission, as the sustainability criteria are strengthened through applying existing land criteria for agricultural biomass and forest biomass.

The final legislative proposal of EED is 132 pages in total. However, as this includes both the old and the new text, the actual proposal is around the same length as REDII. Both Danfoss and VELUX recommended an increase of the energy efficiency target to at least 40 percent. The Commission has accommodated this by increasing the target with at least nine percent to reduce the final and primary energy with 36 percent and 39 percent, respectively, by 2030 (COM/2021/558 Final, p. 33), however this is only binding at EU level and not at national level as both Danfoss and VELUX recommended (Ibid.). Turning to the specific Danish recommendations on the revision of EED, Danfoss proposed amendments to seven articles. In article 5, Danfoss recommended expanding the scope of public buildings to also include regional and local public authorities, which is the same recommendation for article 6 pertaining to governments purchasing only products, services, and buildings with a high energy-efficiency performance. Both recommendations have been fully accommodated in the proposal (Ibid., article 5 and 6). Danfoss further recommended increasing the scope of energy savings by including active energy efficiency measures (article 7 in the current version and article 8 in the proposal), which has not been accommodated (Ibid., article 8). Danfoss' recommendation on charging consumers for their actual consumption is accommodated (article 9), and their recommended change in article 14 on an assessment of including waste heat as a renewable source has also been accommodated, but in the proposal on REDII article 15(7). Lastly, Danfoss recommended revising

article 16 and 17 to ensure access to competent workers, simple and verified accreditation, and certification schemes. It is mentioned in the proposal that this is a focus area for the Commission, but it is not mentioned in a specific article (Ibid., p. 11).

Both VELUX and DI only proposed to amend three articles in total. VELUX recommended amending article 7 concerning an increase in the current annual target of energy savings obligation of 0.8 percent. The Commission has made a new article on this topic within article 8 and accommodated it by increasing the annual net savings on the final energy consumption by 1.5 percent from 2024 until 2030. However, from 2022 until 2024, the target will remain 0.8 percent. DI recommended amending article 4 on the calculation of final energy consumption, which the Commission has fully accommodated by implementing a new paragraph in article 4, paragraph 2E (Ibid., article 4.2.E). Lastly, DI recommends a wider implementation of ETS into more sectors. The Commission has also accommodated this recommendation in article 22 (Ibid. article 22).

Figure 6.14 Overview of Accommodated Danish Recommendations

RED II			EED		
Danish Interest	Article	Implementation	Danish Interest	Article	Implementation
Danfoss	23 part 1	Partly accommodated	Danfoss	5	Fully accommodated
Danfoss	23 part 2	Fully accommodated	Danfoss	6	Fully accommodated
Danfoss	25	Not accommodated	Danfoss	7	Not accommodated
Danish Energy	23	Partly accommodated	Danfoss	9	Fully accommodated
Danish Energy	25	Not accommodated	Danfoss	14	Accommodated, but in REDII
Danish Energy	15	Fully accommodated , but in EED	Danfoss	16	Partly accommodated
DI	29	Partly accommodated	Danfoss	17	Partly accommodated
			VELUX	7	Partly accommodated
			DI	4	Fully accommodated
			DI	22	Fully accommodated

After the Commission adopted the official legislative proposal towards the Parliament and the Council, a new feedback period began, from July 16th, 2021, until November 18th, 2021, regarding any feedback towards the two proposals. In the feedback period on REDII, the Commission received a total of 298 pieces of feedback, where seven of these were from Danish interests, including DE. Examining the feedback provided by DE shows them being generally positive towards the revision but recommending further revisions on some of the elements (Danish Energy, 2021). For instance, they recommended increasing the share of renewable energy even further from 40 percent to 45 percent (even though 40 percent also was their initial recommendation). Turning to the feedback provided after the adoption of

EED, there was a total of 187 pieces. Of these, five were from Danish interests, including VELUX. They welcomed many parts of the revised EED and the overall level of ambition in the proposal but proposed to set binding energy efficiency targets of at least 40 percent at both EU and national level. Nonetheless, the Danish interests are largely supportive of the two revisions. This is also evident from the statements provided by Brunsgaard, Mortensen, and Hasselager in the interviews, where they argue that it is merely a few minor parts of the revisions that should be changed (Appendix M, J, & L). Those of the analyzed Danish interests that have not provided feedback after adoption are assumed to have avoided doing so because they were generally content with the final proposal. Hence, the Danish interests were overall satisfied with the final proposal by the Commission suggesting they view their lobbying efforts to have been a success.

7. Discussion

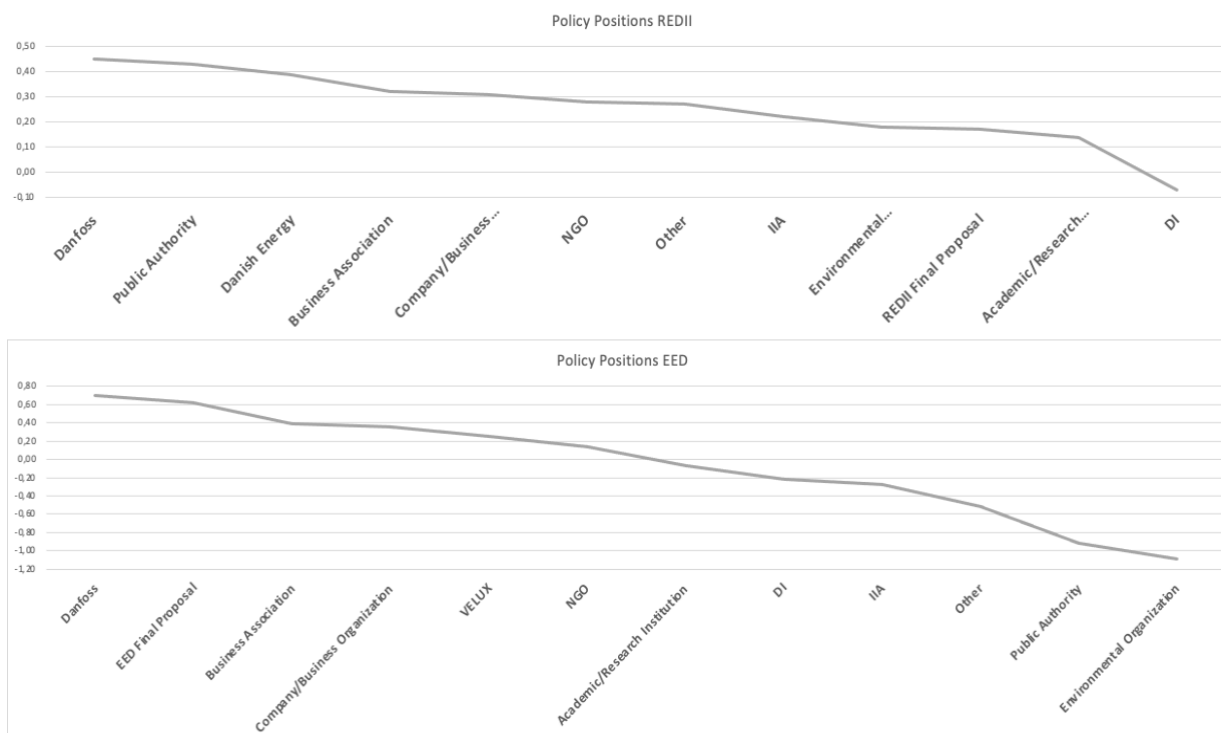
This thesis has sought to find how Danish interest representations obtain influence on EU decision-making. To do so, both a quantitative and qualitative research design was applied based on the theoretical framework that consisted of different parts of lobbying theories to capture certain aspects of the lobbying strategies that Danish interests made use of to influence the Commissions' adopted final proposals on REDII and EED. This section will now turn to a discussion of the findings concerning the accuracy of the theoretical framework, the impact of the political context, whether Danish interests were able to influence the decision-making, and whether the difference in lobbying strategies impacted their mean of success.

The conducted analyses find that, based on the components of the theoretical framework, Danish interests were successful at asserting influence on the Commission for the benefit of the Danish energy industry. The Commission's final adoptions of REDII and EED contain several of the Danish interests' recommendations as detailed in the former section. The quantitative analysis finds that most interests were closely aligned on both directives. But where all interest group types on REDII were within a small interquartile range of -0.14 and 0.49, the interquartile range of EED was larger, between -1.9 and 0.76. This indicates that the revision of EED was more up to debate regarding what it should contain compared to REDII, where most interests agreed on change. Figure 7.1 below shows where the Danish interest positions are placed compared to the average policy positions of all interest representation on both directives. The figure confirms this finding, as e.g., DI is placed with the most

negative policy position in REDII but is more within the middle of EED, despite them having similar policy positions on both directives.

It is evident that Danfoss is the most ambitious interest on average on both directives. This is coherent with the findings from the qualitative analysis, where Danfoss had the most ambitious recommendations of all the Danish interests and is placed in the upper quartile on both directives, which increases the reliability of the findings. DE is placed between the median and the upper quartile on their position, where VELUX is placed around the middle in EED. This finding is somewhat surprising as VELUX's business would benefit from higher energy efficiency targets. However, their estimated policy position as well as DI's indicate that, while Wordfish does give a useful estimation, it is not able to provide the full picture, as the policy positions also have a lot of implicit statements that the program cannot take into account, as discussed by Grimmer and Stewart (2013). For instance, the program does not know of the knowledge the interests provide on their feedback submissions to gain access and influence on policymaking, as well as it cannot take other variables into account such as the lobbying strategies legitimacy or of the interests.

Figure 7.1 Policy Positions Including Danish Interests



Turning to the DQLCA, the overall findings validate some of the aspects of the initial theoretical framework and challenges other parts. This is evident in the overviews in figures 6.11, 6.12, and 6.13. The first part of the DQLCA was conducted on the feedback submissions in order to find 1) the characteristics of Danish policy positions, 2) their access goods, 3) whether their supply meets the demand of the Commission, and 4) the amount of quantity, quality, and efficiency of the access goods. All of these are presumed to impact their success of gaining access and influence, as the theoretical assumptions of the framework are that interests should offer EK or IEEI, be specific in their knowledge in general and in relation to the changes they recommend, offer a critical resource that fits the demand of the Commission, and offer a high quality, quantity, and efficiency access good. If they do this, the assumption is that the interests will gain access to the Commission. The findings show that while all attempt to display EK, the generalizability of their offered access goods ends here to some extent. Danfoss is by far the one Danish interest that best confirms the assumptions of the first part of the theoretical framework, as evident in figures 6.11 and 6.12 and best validates some parts of the lobbying literature e.g. Vikberg's (2019) study of specific interests gain more access in. The next best is DE, then VELUX, and lastly DI. This is aligned with the estimated policy positions found in the quantitative analysis and somewhat aligned with empirical studies finding that large companies have the best opportunity for access (Eising, 2007a).

Turning to the second part of the DQLCA, the findings go in a different direction. In this part of the analysis, the remaining codes of the theoretical framework were analyzed, which concerned 1) interest representation, 2) types of lobbying, 3) provision of information, economic power, and citizen support, and 4) being part of a lobbying coalition. The assumptions of the theoretical framework are that if Danish interests use a multi-channel approach according to their organizational form, use different types of lobbying, provide information, economic power, and citizen support as well as being part of a lobbying coalition, they are assumed to be able to succeed in gaining influence on the Commission's decision-making. In the findings, it is evident that while the two companies focus on gaining influence from multiple channels via a high amount of economic power and information as well as focusing on formal and inside lobbying, the Danish business organizations, on the other hand, have turned to engaging in several types of lobbying, offer especially citizen support but also information and economic power through their members. They also try to engage in different lobbying coalitions, both formal and informal, by being members of several large European alliances. Hence, the overall findings show that the theoretical framework does capture relevant components of the Danish interests'

lobbying strategies, but that the focus of the lobbying strategies differ more than expected. The findings confirm and challenge different parts of the lobbying literature. For instance, Eising's (2004) study finds that different channels of representation increase the success of lobbying, which is in coherence with the findings of this study, where other studies find that the use of inside and outside lobbying increase the success of the lobbying efforts (Dür & Mateo, 2013), which fits DI and DE but not Danfoss.

The findings of the conducted methods show correlation between the lobbying strategies and the influence obtained by Danish interests. Figure 6.14 provides an overview of the findings of how many of the Danish interests' recommendations that were implemented in the final proposals. Evidently, all the Danish interests managed to influence the Commission. However, while especially DI has a high implementation rate, VELUX's recommendation has only been partly accommodated. Despite Danfoss' many recommendations, they have been successful in influencing the Commission either fully or partly on all but one of their recommendations. DE has had the highest variation of success as some recommendations have been accommodated and one has not. Hence, the first part of the DQLCA regarding access good and the like has an impact on how much influence that can be obtained, but on the other hand, the remaining parts of the lobbying strategies (the second part of the DQLCA) are at least as important if not more important, which correlates with different aspects of the empirical literature (Eising, 2007a; Dür & Mateo, 2013; Beyers, De Bruycker, & Baller, 2015; Klüver, Braun, & Beyers, 2015). If not, then DI would never have been able to gain influence based on their access good. Instead, their focus on various types of lobbying has proven successful. Conversely, Danfoss shows that their primary focus on providing a strong access good also made them succeed in obtaining influence. Hence, the results show that the interplay of the components of their lobbying strategies is important but focusing on some components more than others does not decrease the possibility of influencing decision-making in the Commission. However, as the full process of decision-making and lobbying has not been traced, the full effect of lobbying strategies cannot be detected. Instead, the findings correlate with the theoretical expectation of how Danish interests obtain influence through lobbying strategies.

Furthermore, the results of these analyses should also be compared to outside factors. Evidently, the lobbying strategies of Danish interests have had an impact on the success of the influence they obtained, but there are also underlying mechanisms that made it easier for the Danish interests to

obtain influence. For instance, as these revisions are part of EGD, it indicates that the revisions would be ambitious, as the whole point of the revisions is to increase targets to enable the EU to reach the goal of climate neutrality by 2050 (European Commission, 2019a). Furthermore, the final results are impacted by the Commission being subject to an underlying mechanism of how to make its legislative proposals, as the Commission knows that because there is a difference of the opinions of the Council and the Parliament on average (Coen & Richardson, 2009), they need to position themselves between these two institutions to ensure the proposal will be accepted and keep the legitimacy of their institutions (Klüver, 2013). Hence, there is also the factor of "luck" for the Danish interests, as they have positions that generally are in line with the public interest (Youngs, 2021). I.e., they have a better opportunity to exert influence, where the opposite would have been true if all the Danish interests were skeptical on revising the two directives. Lastly, as most stakeholders have policy positions not far from the Danish ones, many of these may also have recommended revisions that entail a lot of the same amendments, which makes the Danish interests more successful in implementing their recommendations, because other interests have the same opinion.

The initial part of the thesis discussed whether Danish interests have easier access to gain influence on sustainability policy issues due to Denmark's position as a pioneering country. However, where Dionigi, Martinussen, and Hasselager argue that it is easier to gain access, because Danish interests advocate for a similar agenda as the Commission (Appendix I, K, & L), Mortensen and Brunsgaard argue that it still is difficult due to the political context of other countries that may not be as much in favor of many measures (Appendix J & M). Nonetheless, they all agree that Denmark has a lot of knowledge on the area of the green transition. Because of the extant underlying structure in Denmark that we need to come up with alternative export opportunities, sustainability has become a big potential export market (Brunsgaard, Appendix M). Hence, Danish interests indirectly have an advantage because knowledge on the area is higher. This indicates that the findings of this study may not be too generalizable to other policy areas, as the case of Danish interests and the green transition is unique, and that empirical studies have found that lobbying strategies are interdependent on the interest representation's country of origin (Rival, 2012). However, the findings become more generalizable within the same policy area, as the study indicates that the positions of Danish interests do not differ drastically from the opinions of the majority of other MS' interests. Furthermore, the theoretical framework can easily be generalized to other policy areas, stakeholders, and lobbying on other EU

institutions if the examined interests have provided formal feedback to an EU institution and the framework takes the institutional context into account.

8. Conclusion

The purpose of this thesis was to perform a comprehensive analysis to answer the research question *“What strategies did Danish lobbyists within the Danish energy industry use to influence the Renewable Energy Directive and the Directive on Energy Efficiency and were they successful in having an influential effect for the benefit of the interests of the Danish energy industry?”* In order to find an answer to this question, the two energy directives, RED II and EED were used as the basis for the analysis of Danish lobbying efforts. In order to analyze the Danish lobbying strategies on obtaining influence on these two directives, a theoretical framework consisting of several components from the lobbying literature was built to capture important aspects of the strategies. The theoretical framework was tested by applying a DQLCA, where a codebook containing eight codes was developed. The first four codes were the measures of analysis in the first part of the qualitative analysis and were applied to the feedback submissions provided by Danish interests. The remaining four codes were tested on the second part of the qualitative analysis that sought to reveal other components of the Danish interests' lobbying strategies. Lastly, the final legislative proposals on both directives were analyzed to find the obtained influence of the Danish interests.

All of this was put in the context of a quantitative content analysis that provided an overview of the political context. The analysis found that most of the interests had an opinion positioned close to each other and supportive of revising the two directives. As discussed in section 7, this had positive implications for the possibility of influence by Danish interests, as most of the interests would not be opposed to these amendments, because they themselves supported the overall objective of becoming climate neutral by 2050. Section 7 further discussed the implications of the institutional context that the Danish interests were in, as this also had a positive impact on their success of influence, since the Commission would be most responsive to the opinions of interests that were somewhat aligned with the presumed positions of the Parliament and the Council.

The final results show that the Danish interests were successful in influencing the final proposals as a majority of their recommendations were implemented by the Commission. The findings further showed that the two separate parts of the DQLCA could not by themselves explain what strategies the

Danish interests used to obtain influence. Rather, the combination of both found that while the provision of access good is important to gain influence on the policymaking, other parts of the lobbying strategies such as the types of lobbying, lobbying coalitions, and the strategic cooperation with European alliances are just as important. Hence, the DQLCA validated the coherence of the theoretical framework. Further, the qualitative analysis found that the Danish lobbying strategies all contained components of access goods, different types of interest representation, different types of lobbying used, provision of information, economic power, and citizen support as well as engaging in lobbying coalitions but to a varying degree. Hence, as long as the lobbying strategies of Danish interests contain all of the strategic components to some extent, there is a correlation with gaining influence on the Commission's decision-making process.

There are two primary implications of these findings. First, the political context can impact the possibility of influence due to underlying mechanisms. This means that if one of the Danish interest groups had been opposed to revising the directives, the chances of succeeding in influencing the final proposals would have been low, as the majority of other interests were supportive of a revision, and that the EU institutions themselves also showed support for revising the directive. Secondly, the correlation between influence and lobbying strategies suggests that the theoretical framework entails enough components to provide some aspects of the explanation for the influence of Danish interests but more aspects should be considered to find whether they are a part of the correlation between influence and strategy. Hence, if a Danish interest group or company seeks to gain influence on the policymaking process, merely offering an access good or only focusing on formal lobbying will not result in influence. The interest needs to be as comprehensive as possible in their lobbying strategies to increase the possibility of success. Especially, the types of lobbying that they engage in, for instance being present in the EU institutions, are of great importance as proven by DI's lobbying success despite them offering a relatively incomplete access good. Conversely, Danfoss's lobbying success shows that a greater emphasis on the supply and quality of their access good makes up for their smaller emphasis on other types of lobbying efforts.

In future research, studies can focus on how the proposals are lobbied in the Parliament and the Council and then compare the differences between the legislative proposals and the adopted final legislations. This will enable interesting comparisons on whether the Danish interests have been able to include their recommendations in the final legislation, or whether other interest representations

have succeeded in lobbying the EU institutions in another direction. Further, it could also be interesting to compare the Danish interests with another Member State by applying either a most similar systems design, where the Member State of interest is similar to Denmark but might have policy positions that are very different from Denmark, or use the most different systems, where the Member State of interest is very different from Denmark but has similar policy positions.

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Appendices

Appendix A – Interview Guide

I have made two types of interview guides depending on, who the questions were addressed to. One of the interview guides addressed actors, who submitted feedback and consultation answers, where the second interview guide was addressed to actors, who have expert knowledge or interests on the field. The questions were designed within five categories: 1) Context and knowledge on EU Affairs, 2) Process Tracing, 3) Access to the Commission, 4) Lobbying strategies, and 5) Lobbying success. These questions are based on the theoretical framework as well as the underlying procedure of process tracing. The questions were designed in the following way:

Theme 1 – Context and knowledge on EU Affairs

1. Please present your position and key responsibilities?
2. What kind of members does your organization represent and how do you represent their interests in EU?
3. How do you and your organization engage in influencing legislative proposal through the European Commission?

Theme 2 – Process Tracing

4. What underlying ideas and process did you have when deciding to provide feedback to the Commission on the energy directives?
5. As you have a lot of members that may have different interests, how do you represent all their interests?
6. Do you cooperate with other organizations both within Denmark and European organizations in EU? Were you able to influence the position of the organizations you cooperated with?

Theme 3 – Access to the Commission

7. How did you promote your interests towards the Commission in order to influence the revision of the directives?
8. What are the pro and cons of having your interests represented in EU by you instead of doing it as a company?

9. Does your position weigh higher within policy areas such as climate and energy, where Denmark is considered to be leading country compared to other policy areas?

Theme 4 – Lobbying strategies

10. Did you have a specific lobby strategy to obtain influence?
11. Did you have meeting with the Commission? How often?
12. What was your goal of providing feedback on the directives?

Theme 5 – Lobbying success

13. Did you obtain the influence you wanted?
14. Were you positive towards the directives? Were there any elements you wanted to change or were you in general satisfied with the adopted legislative proposals?
15. Did you experience that the Commission listened to your feedback? Is it possible for Danish interests to influence EU legislation or is it difficult because Denmark is a small country?

All the interviews were conducted in Danish and translated into English. All the interviewed persons were offered the possibility to read through the translation and accept the citations in the in-text. As the interviews were conducted in a semi-structured way, the above-mentioned questions were not necessarily asked chronologically or in that specific way. Rather, the questions were asked in a natural place in the interview, and some of the questions were answered as part of the same question. All of the interviews were between 30 and 50 minutes.

Appendix B– Overview of all Danish Interest Groups and Companies That Have Provided Feedback to at Least One of the Energy Directives

Company	The Energy Efficiency Directive			The Renewable Energy Directive			Total number of feedback
	IIA	Consultation	Feedback after adoption	IIA	Consultation	Feedback after adoption	
Danfoss	X			X	X		3
Confederation of Danish Industry	X	X		X	X		4
Danish Energy	X			X	X	X	4
Synergi	X	X	X				3
VELUX	X	X	X		X		4
CONCITO		X					1
Ejendom Danmark		X					1
Danish Trade Union of Builders and Wood Workers		X					1
Danish District Heating Association		X			X		2
Danish Shipping				X	X	X	3
Agency of Palaces and Culture			X			X	2
Astek Danmark			X				1
Danish Chamber of Commerce			X			X	2
Ørsted				X	X	X	3
Daka Denmark				X			1
Wind Denmark					X		1

A.P. Møller-Mærsk					X		1
Nature Energy					X		1
Energinet					X		1
ROCKWOOL		X			X		2
The National Association for Information on Pollution from Wood Stoves					X		1
Green Transition Denmark					X		1
CM Biomass Partners					X		1
NOAH-Friends of the Earth Denmark					X		1
Hydrogen Denmark						X	1
Danish Forest Association						X	1
Energy Track & Trace						X	1
Total number	5	9	5	6	16	7	48

Appendix C – All Feedback to Renewable Energy Directive II pr. Group

Company/Business Organization	Business Association	NGO
The Swedish Wind Energy Association	Confederation of Norwegian Enterprise	WWF European Policy Office (Belgium)
GA Drilling	CEPM - Confédération Européenne de la Production de Maïs (France)	Wild Europe Initiative (Hungary)
Bio Oil Group	Central Europe Energy Partners (Belgium)	Deutsche Umwelthilfe (DUH) (Germany)
CAMPA IBERIA/IMBIOFUEL ITALY (Spain)	European Automobile Manufacturers Association	ClientEarth (Belgium)
Northvolt (Sweden)	Fachverband Biogas e.V. - German Biogas Association (Germany)	National Wildlife Federation (United States)
Electricité de France (EDF) (France)	Association for Energy Storage Systems Germany (BVES) (Germany)	Habitat for Humanity Hungary (Hungary)
Fortum corporation (Finland)	Swedish Wood-Fuel Association (Sweden)	ZERO - Ass. Sustainability of Earth System (Portugal)
ENGIE (France)	ABA - Advanced Bioenergy Association (Portugal)	Forest Stewardship Council (FSC) (Germany)
Air France-KLM (Netherlands)	Federation of German Industries (BDI) (Germany)	SVOL (Czech Republic)
Danfoss	European Heat Pump Association (Belgium)	Federation of Swedish Family Forest Owners (Sweden)
Bundesverband der Deutschen Luftverkehrswirtschaft (Germany)	COGEN Europe (The European Association for the Promotion of Cogeneration) (Belgium)	Bellona Europa (Belgium)
AGCS Gas Clearing and Settlement AG (Austria)	UNICA (Brazil)	Friends of the Earth Europe (Belgium)
ERG S.p.a. (Italy)	US Industrial Pellet Association (United States)	Energy Norway (Norway)
FISE Assoambiente (Italy)	Deutsches Verkehrsforum e.V. (Germany)	CAN Europe (Belgium)
Ørsted	SolarPower Europe (Belgium)	EUROCITIES (Belgium)
SHV Energy (Netherlands)	VIK - Verband der Industriellen Energie- und Kraftwirtschaft (Germany)	Greenpeace (Belgium)
Enerkem (Canada)	Business & Science Poland (Poland)	Biofuelwatch (United Kingdom)
PGNiG SA (Poland)	Confcommercio - Imprese per l'Italia (Italy)	CEE Bankwatch Network (Czech Republic)
Eni SpA (Italy)	WindEurope (Belgium)	International Union of Property Owners (UIPI) (Belgium)
The Federation of Swedish Farmers – Lantbrukarnas Riksförbund (Sweden)	Negative Emissions Platform (Belgium)	Natuur & Milieu (Netherlands)

Hardlevel (Portugal)	Airlines for Europe A4E (Belgium)	Österreichischer Biomasse-Verband (Austria)
Falck Renewables (Italy)	Gas Infrastructure Europe (GIE) (Belgium)	Environmental Defense Fund (United Kingdom)
BP PLC (United Kingdom)	Euroalliances (Belgium)	Association of Issuing Bodies ivzw (Belgium)
Statkraft (Norway)	Unione Petrolifera (Italy)	Dutch Platform Sustainable Biofuels (Netherlands)
Veolia (France)	Liquid Gas Europe (Belgium)	ECOS - Environmental Citizens' Organisation for Standardisation (Belgium)
E.ON (Germany)	European Solar Thermal Electricity Association (Belgium)	CNG-Club e. V. (Germany)
RE-Source Platform (Belgium)	Forestiers Privés de France(FRANSYLVA) (France)	Natural Resources Defense Council (NRDC) (United States)
Lantmännen (Sweden)	European Heating Industry (EHI) (Belgium)	Krajowa Izba Biopaliw (Poland)
Danish Shipping (Denmark)	Airlines for America (United States)	Health Care Without Harm Europe (Belgium)
Greenergy Fuels Ltd (United Kingdom)	Community Power Coalition (Belgium)	Österreichischer Forstverein (Austria)
MYTILINEOS SA (Greece)	Austrian Federal Economic Chamber (Wirtschaftskammer Österreich/WKÖ) (Austria)	Aedes (Netherlands)
GEN-I, trgovanje in prodaja električne energije, d.o.o. (Slovenia)	Forum Odbiorców Energii Elektrycznej i Gazu (Poland)	European Federation for Transport and Environment (Belgium)
GasNaturally (Belgium)	FNADE (France)	Deutscher Naturschutzring (Germany)
Solar Heat Europe (Belgium)	CO2 Value Europe (Belgium)	COPA-Cogeca (Belgium)
CEWEP - Confederation of European Waste to Energy Plants Ireland (Ireland)	FEDIOL - The EU Vegetable Oil and Proteinmeal Industry (Belgium)	EuroNatur Foundation (Germany)
Eurofuel (Belgium)	UFE (Union of French Electricity Industry) (France)	Landwirtschaftskammer Österreich (Austria)
Waste4me B.V. (The Netherlands)	CEMBUREAU (Belgium)	Regulatory Assistance Project (Belgium)
Natural Bio Power Company (Netherlands)	Natural & bio Gas Vehicle Association (NGVA Europe) (Belgium)	Focus Association for Sustainable Development (Slovenia)
OMV Aktiengesellschaft (Austria)	Gas Distributors for Sustainability (Belgium)	Southern Environmental Law Center (United States)
Utilitalia (Italy)	Bioenergy Europe (Belgium)	European Renewable Gas Registry - ERGaR aisbl (Belgium)
Groupe Avril (France)	European Data Centre Association (EUDCA) (Belgium)	The John Muir Project (United States)

European Chemical Industry Council (Cefic) (Belgium)	EBB - European Biodiesel Board (Belgium)	Energy Agencies of Sweden (Sweden)
ecoMotion GmbH (Germany)	Bioenergia ry - the Bioenergy Association of Finland (Finland)	ITPC- International Tree Protection Commission (Italy)
Edison (Italy)	EFIEES - European Federation of Intelligent Energy Efficiency Services (Belgium)	Stowarzyszenie Światowy Kongres Polaków (Poland)
Danish Energy (Denmark)	EUTurbines (European Association of Gas and Steam Turbine Manufacturers) (Belgium)	Environmental Organization
GRTgaz (France)	FEDENE - Fédération des services énergie environnement (France) (France)	Bundesvereinigung gegen Fluglärm e.V. (Germany)
ECOMOTION BIODIESEL SA (Spain)	Verband der Verarbeitungsbetriebe Tierischer Nebenprodukte e.V. (Germany)	Ecologistas en Acción (Spain)
Enedis (France)	Deutscher Industrie- und Handelskammertag (DIHK e.V.) (Germany)	Partnership for Policy Integrity (United States)
EREF (European Renewable Energies Federation) (Belgium)	Eurogas (Belgium)	Stichting Fern (Belgium)
Daka Denmark A/S (Denmark)	Bundesverband Erneuerbare Energie e.V. (Germany)	Foundation Tree Union Netherlands (Netherlands)
APAG (The European Oleochemicals & Allied Products Group), a sector group of Cefic (Belgium)	Elettricità Futura (Italy)	Zero Waste Europe (Netherlands)
Repsol, S.A. (Spain)	HARRPA, a Cefic Sector Group (Belgium)	Vent de Colère ! Fédération nationale (France)
Confederation of Danish Industry (Denmark)	FEAD (Belgium)	3 associations PPEBP+ADERT+APNE (France)
Enel (Italy)	European Biogas Association (Belgium)	Cérémé (France)
STEAG GmbH (Germany)	Polish Electricity Association (Poland)	CLER Réseau pour la transition énergétique (France)
Snam S.p.a (Italy)	CEWEP - Confederation of European Waste-to-Energy Plants (Belgium)	Stowarzyszenie Pracownia na rzecz Wszystkich Istot (Poland)
Suez (Belgium)	EUGINE - European Engine Power Plants Association (Belgium)	European Marine Board (Belgium)
European Fermentation Group (EFG) - a Cefic Sector Group (Belgium)	Verband der Deutschen Biokraftstoffindustrie e.V. (Germany)	Public Authority
AIR LIQUIDE (France)	World Shipping Council (Belgium)	Umweltbundesamt - Federal Environment Agency - Germany (Germany)

Terna SpA (Italy)	European Property Federation (Belgium)	Government of the Netherlands - Ministry of Economic Affairs and Climate Policy (Netherlands)
GAZ-SYSTEM S.A. (Poland)	UPEI - Europe's Independent Fuel Suppliers (Belgium)	Ministry of Transport of the State of Baden-Württemberg (Germany)
VBO FEB (Belgium)	SEA Europe (European Shipyards and Marine Equipment Manufacturers Association) (Belgium)	Region Östergötland (Sweden)
Port of Rotterdam (Netherlands)	European Technology and Innovation Platform Bioenergy (ETIP Bioenergy) (Germany)	E-Control (Austria)
essenscia (Belgium)	Polish Chamber of Chemical Industry (Poland)	City of Stockholm (Sweden)
Norsk Industri (Norway)	Bundesverband der deutschen Bioethanolwirtschaft e.V. - BDBe (Germany)	Consiglio Nazionale dei Periti Industriali (Italy)
VERBUND AG (Austria)	Eurelectric (Belgium)	CEMR Council of European Municipalities and Regions (Belgium)
Landwärme GmbH (Germany)	Federchimica/Assogasliquidi (Italy)	Business Finland (Finland)
Drax Group Plc. (United Kingdom)	Confederation of Finnish Industries EK (Finland)	Bayerisches Staatsministerium für Wohnen, Bau und Verkehr (Bavarian State Ministry of Housing, Building and Transport) (Germany)
Paicu&Sons Consulting (Romania)	GAPKI - Indonesian Palm Oil Association (Indonesia)	Havenbedrijf Antwerpen (Belgium)
DRT (France)	ChargeUp Europe (Belgium)	Barcelona provincial Council (Diputació de Barcelona) (Spain)
FEP - the European Federation of the Parquet industry (Belgium)	Deutscher Bauernverband (German Farmers' Association) (Germany)	Academic/Research Institution
North European Oil Trade (NEOT) (Finland)	AGFW e.V. (Germany)	Embrapa Meio Ambiente (Brazil)
Recoup Energy Solutions Ltd (United Kingdom)	Skogsindustrierna (Sweden)	European Academies Science Advisory Council (Germany)
FGW Austrian Association for Gas and District Heating Associations (Austria)	CurrENT Europe (Belgium)	Institute for Governance & Sustainable Development (IGSD)
St1 Nordic Oy (Finland)	UNITI Bundesverband mittelständischer Mineralölunternehmen (Germany)	International Council on Clean Transportation (United States)
European Autoclaved Aerated Concrete Association (Germany)	European Copper Institute (Belgium)	Commissariat à l'énergie atomique et aux énergies alternatives (CEA) (France)

Neste Corp. (Finland)	EGEC Geothermal (Belgium)	PBL Netherlands Environmental Assessment Agency, in the position of Lead of the policy analyses work package of the Horizon 2020 project SIM4NEXUS (Netherlands)
EFFPA - European Former Foodstuff Processors Association (Belgium)	ASSOCOSTIERI (Italy)	Trade Union/Consumer Organization/Other
Stadtwerke München GmbH (Germany)	Union zur Förderung von Oel- und Proteinpflanzen e. V. (Germany)	EFBWW (Belgium)
Preem AB (Sweden)	IOGP (Belgium)	Bundesarbeiterkammer (Austria)
SuperNode Ltd (Ireland)	RECHARGE aisbl - The Advanced Rechargeable and Lithium Batteries Industry Association (Belgium)	Hydrogen Europe (Belgium)
Encro (Croatia)	Cloud Infrastructure Service Providers in Europe (CISPE) (Belgium)	ICLEI - Local Governments for Sustainability European Secretariat (Germany)
Vattenfall AB (Sweden)	FuelsEurope (Belgium)	FAME
N.V. Nederlandse Gasunie (Netherlands)	EIGA (Belgium)	DIN Standards Committee "Principles of Environmental Protection", Subcommittee „Revision of EN 16325“ (Germany)
Enviengroup - www.enviengroup.eu (Slovakia)	European Committee of Heating, Ventilation, Air Conditioning and Refrigeration Manufacturers - Eurovent (Belgium)	Sustainable Biomass Program (Germany)
Fluxys (Belgium)	Mittelstandsverband abfallbasierter Kraftstoffe e.V. (MVaK) (Germany)	ART Fuels Forum (Belgium)
Münzer Bioindustrie GmbH (Austria)	UNIDEN (France)	SGAB Editors (Belgium)
Ethanol Europe (Hungary)	Industrial Minerals Association - Europe/ IMA-Europe (Belgium)	European State Forest Association EUSTAFOR (Belgium)
Graanul Invest AS (Estonia)	Verband der Automobilindustrie (VDA) (Germany)	German Energy Agency (Germany)
Amazon Europe Core SARL (Luxembourg)	ePURE - European renewable ethanol (Belgium)	Build Europe (Belgium)
European Panel Federation (Belgium)	The Swedish Petroleum & Biofuels Institute (Sweden)	The Forest, Climate and Biomass Working Group (Belgium)
Iberdrola, S.A. (Spain)	Euroheat & Power (Belgium)	IEA Bioenergy Technology Collaboration Programme (Belgium)
IFIEC Europe (Belgium)	COFALEC (France)	Bioenergy Europe (Belgium)
EFPPA (Belgium)	German Chemical Industry Association - VCI (Germany)	Gas Networks Ireland (Ireland)
CERIAN SHOWER S.L. (Spain)	EUROMOT (Belgium)	Green Energy Platform - Farm Europe (Belgium)

GreenGasAdvisors (Germany)	Bundesverband Bioenergie e.V. (Germany)	
Confederation of European Forest Owners (Belgium)	Finnish Energy (Finland)	
Naturgy (Spain)	Finnish Forest Industries Federation (Finland)	
Biocom energía, S.L. (Spain)	APPA Biocarburantes (Spain)	
Omrin (Netherlands)	Sustainable Fuels (Cefic) (Belgium)	
Enviva (United States)	Svebio, Swedish Bioenergy Association (Sweden)	
Technology Industries of Finland TIF (Finland)	Energy Technologies Europe (Belgium)	
LanzaTech (United Kingdom)	HAZARDOUS WASTE EUROPE (France)	
H2V INDUSTRY (France)	ENTSOG (Belgium)	
Biodiesel Aragon (Spain)	EurEau (Belgium)	
Solvay (Belgium)	Cepi - European paper industry (Belgium)	
Gaia Green (France)	BDEW Bundesverband der Energie- und Wasserwirtschaft e.V. (Germany)	
Green Biofuels Ireland Limited (Ireland)	GdW (Germany)	
RENEWABLE ENERGY GROUP (Germany)	FEFAC (Belgium)	
EVN AG (Austria)	Advanced Biofuels Coalition (LSB) (Belgium)	
Svevind Group together with Greenfact (Sweden)		
BDI-BioEnergy International GmbH (Austria)		
EWABA (Belgium)		
TWEFDA Ltd (United Kingdom)		

Appendix D – All Feedback to Energy Efficiency Directive pr. Group

Company/Business		
Organization	Business Association	NGO
Saint-Gobain (France)	Confederation of Norwegian Enterprise (Norway)	Habitat for Humanity Hungary (Hungary)
Schneider Electric (France)	BIBM - Federation of the European Precast Concrete Industry (Belgium)	AirClim (Sweden)
Knauf Energy Solutions (Belgium)	Federchimica/Assogasliquidi (Italy)	ClientEarth (Belgium)
Public Power Corporation SA (Greece)	Finnish Forest Industries Federation (Finland)	Friends of the Earth Europe (Belgium)
MYTILINEOS SA (Greece)	Deutsches Verkehrsforum e.V. (Germany)	International Union of Property Owners (UIPI) (Belgium)
Danfoss A/S (Denmark)	US Industrial Pellet Association (United States)	CEE Bankwatch Network (Czech Republic)
ENGIE (France)	SolarPower Europe (Belgium)	Housing Europe (Belgium)
European Heat Pump Association (Belgium)	Confcommercio - Imprese per l'Italia (Italy)	Health Care Without Harm Europe (Belgium)
ENGIE II (France)	COGEN Europe (The European Association for the Promotion of Cogeneration) (Belgium)	Deutsche Umwelthilfe e.V. (Environmental Action Germany) (Germany)
Outokumpu Oyj (Finland)	Euroalliages (Belgium)	Aedes (Netherlands)
Veolia (France)	European Heating Industry (EHI) (Belgium)	Deutscher Naturschutzring (Germany)
ELECTRICITE DE FRANCE (EDF) (France)	Liquid Gas Europe (Belgium)	The Coalition for Energy Savings (Belgium)
E.ON (Germany)	PU Europe (Belgium)	Climate Action Network Europe (CAN Europe) (Belgium)
Enel (Italy)	eu.bac (Belgium)	Habitat for Humanity International (Slovakia)
GEN-I, trgovanje in prodaja električne energije, d.o.o. (Slovenia)	Austrian Federal Economic Chamber (Wirtschaftskammer Österreich/WKÖ) (Austria)	ACT 4 / The Energy Action Project (France)
Eurofuel (Belgium)	FNADE (France)	The Swedish Union of Tenants / Hyresgästföreningen (Sweden)
Burda Druck GmbH (Germany)	Swedenergy/Energiföretagen Sverige (Sweden)	Democratisch Energie Initiatief (Netherlands)
CEWEP Ireland - Confederation of European Waste to Energy Plants Ireland (Ireland)	Gas Distributors for Sustainability (GD4S) (Belgium)	EiiF - European Industrial Insulation Foundation (Switzerland)

Solar Heat Europe (Belgium)	Kemianteollisuus ry (Finland)	Right to Energy Coalition (Belgium)
GasNaturally (Belgium)	UFE (Union of French Electricity Industry) (France)	Energy Agencies of Sweden (Sweden)
Knauf Insulation (Belgium)	EdEn (Equilibre des Energies) (France)	The Regulatory Assistance Project (RAP) (Belgium)
Edison (Italy)	European Chemical Industry Council (Cefic) (Belgium)	Stowarzyszenie Światowy Kongres Polaków (Poland)
Danish Energy (Denmark)	European Insulation Manufacturers Association (Belgium)	Environmental Organization
Airbus (SAS) (France)	Confederation of Finnish Industries EK (Finland)	Emergenzaclimatica.it (Italy)
Enedis (France)	FEDENE - Fédération des services énergie environnement (France)	3 associations d'Eure et Loir PPEEBP+ ADERT+APNE (France)
Snam S.p.a (Italy)	European Data Centre Association (EUDCA) (Belgium)	Cérémé (France)
VBO FEB (Belgium)	European Chemical Industry Council (Cefic) (Belgium)	Instytut na rzecz Ekorozwoju (Poland)
essenscia (Belgium)	EFIEES - European Federation of Intelligent Energy Efficiency Services (Belgium)	Public Authority
Norsk Industri (Norway)	European Alliance to Save Energy (Belgium)	Vlaams Gewest (Belgium)
DI (Denmark)	EUTurbines (European Association of Gas and Steam Turbine Manufacturers) (Belgium)	Consiglio Nazionale dei Periti Industriali (Italy)
FEP - the European Federation of the Parquet industry (Belgium)	GAS INFRASTRUCTURE EUROPE (GIE) (Belgium)	City of Stockholm (Sweden)
FGW-Association of Gas and District Heating Companies (Austria)	Bioenergy Europe (Belgium)	CEMR Council of European Municipalities and Regions (Belgium)
Fortum Oyj (Finland)	The Confederation of Swedish Enterprise (Sweden)	Ihobe (Spain)
Iberdrola, S.A. (Spain)	European Copper Institute (Belgium)	Business Finland (Finland)
VELUX A/S (VELUX Group) (Denmark)	Bundesverband Erneuerbare Energie e.V. (Germany)	Havenbedrijf Antwerpen (Belgium)
European Autoclaved Aerated Concrete Association (Germany)	ZVEI - Zentralverband Elektrotechnik- und Elektronikindustrie e.V. (Germany)	Barcelona provincial Council (Diputació de Barcelona) (Spain)

		Academic/Research Institution
Stadtwerke München GmbH (Germany)	FEAD (Belgium)	
Finnish Energy (Finland)	Elettricità Futura (Italy)	Universitat Autònoma de Barcelona (Spain)
OMV Aktiengesellschaft (Austria)	EUGINE - European Engine Power Plants Association (Belgium)	The Shift Project (France)
TOTAL S.E. (France)	FORATOM (Belgium)	Commissariat à l'énergie atomique et aux énergies alternatives (CEA) (France)
European Panel Federation (Belgium)	OSGP Alliance (Netherlands)	Univeristé de Liège (Belgium)
IFIEC Europe (Belgium)	SYNERGI (Denmark)	
Eurogas (Belgium)	FuelsEurope (Belgium)	
		Trade Union/Consumer Organization/Other
Turboden S.p.A. (Italy)	UPEI - Europe's Independent Fuel Suppliers (Belgium)	
VIK Verband der Industriellen Energie- und Kraftwirtschaft e.V. (Germany)	ESMIG- European Smart Energy Solutions Providers (Belgium)	EFBWW (Belgium)
Hauptverband der deutschen Bauindustrie (Belgium)	Eurelectric (Belgium)	Bundesarbeitskammer (Bangladesh)
Technology Industries of Finland TIF (Finland)	EGEC Geothermal (Belgium)	Public Housing Sweden (Sweden)
Solvay (Belgium)	Polish Electricity Association (Poland)	Bundesarbeitskammer (Austria)
Aliatis Energy and Property Fund (Cyprus)	AGFW e.V. (Germany)	Council of European Municipalities and Regions (CEMR) (Belgium)
	Skogsindustrierna (Sweden)	WindEurope (Belgium)
	Jernkontoret (Sweden)	Buildings Performance Institute Europe (BPIE) (Belgium)
	Polish Chamber of Chemical Industry (Poland)	Build Europe (Belgium)
	Cloud Infrastructure Service Providers in Europe ASBL (CISPE) (Belgium)	German EMAS Advisory Board (Umweltgutachterausschuss) (Germany)
	European Committee of Heating, Ventilation, Air Conditioning and Refrigeration Manufacturers - Eurovent (Belgium)	Club EMAS (Spain)

electric Handdryer Association (eHA) (Germany)	Gas Networks Ireland (Ireland)
UNIDEN (France)	
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V. (Germany)	
European Partnership for Energy and the Environment (EPEE) (Belgium)	
Euroheat & Power (Belgium)	
eco - Verband der Internetwirtschaft e.V. (Germany)	
Glass for Europe (Belgium)	
DENEFF e. V. (Germany)	
EUROMOT (Belgium)	
Energy Technologies Europe (Belgium)	
COENOVE (France)	
EurEau (Belgium)	
Verband der Chemischen Industrie e.V. (VCI) (Germany)	
Cepi - European paper industry (Belgium)	
EuroACE (Energy Efficient Buildings) (Belgium)	

Appendix E – Wordfish Code

Below is the code used for both the policy positions on REDII and EED. The only difference has been the source of the data, as the categories in REDII are based on those interests apparent in appendix B, and the data used in EED is based on the interests in appendix C.

```
require(tm)
require(quanteda)
require(quanteda.textmodels)
require(quanteda.textplots)
require(readtext)
library(plyr)
library(readr)
require(tm)
require(dplyr)

#Load text
Academictxt <- readtext("~/Mie/READIIdata/Academic Reseach Institution")
Businessstxt <- readtext("~/Mie/READIIdata/Business Association")
REDIIstxt <- readtext("~/Mie/READIIdata/Commission/REDII Proposal.txt")
IIAtxt <- readtext("~/Mie/READIIdata/Commission/IIA.txt")
companytxt <- readtext("~/Mie/READIIdata/Company Business Organization")
enviromentalstxt <- readtext("~/Mie/READIIdata/Environmental Organization")
ngotxt <- readtext("~/Mie/READIIdata/NGO")
othertxt <- readtext("~/Mie/READIIdata/Other")
publictxt <- readtext("~/Mie/READIIdata/Public Authority")
organisationavne <- readtext("~/Mie/organisationsnavne READII.txt")

#setting docvars
Academictxt$group <- "Academic"
Businessstxt$group <- "Bus. Ass"
REDIIstxt$group <- "REDII"
IIAtxt$group <- "IIA"
companytxt$group <- "Company Bus. Org."
enviromentalstxt$group <- "Environmental"
ngotxt$group <- "NGO"
othertxt$group <- "Other"
publictxt$group <- "Public Authority"

academicdf <- data.frame(Academictxt)
businessdf <- data.frame(Businessstxt)
REDII df <- data.frame(REDIIstxt)
IIA df <- data.frame(IIAtxt)
companydf <- data.frame(companytxt)
enviromentaldf <- data.frame(enviromentalstxt)
ngodf <- data.frame(ngotxt)
```



```
otherdf <- data.frame(othertext)
publicdf <- data.frame(publictxt)

#merging data
alltxt <- rbind(academicdf,businessdf,IIAdf,REDIIdf,companydf,enviromentaldf,ngodf,otherdf,publicdf)

#setting master corp
corp <- corpus(alltxt)

require(tm)
#creating tokens
tokenwordfish <- tokens(corp, remove_punct = TRUE)
tokenwordfish <- tokens(tokenwordfish, remove_url = TRUE)
tokenwordfish <- tokens(tokenwordfish, stemDocument(language = "english"))
tokenwordfish <- tokens(tokenwordfish, remove_separators = TRUE)
tokenwordfish <- tokens(tokenwordfish, remove_symbols = TRUE)
tokenwordfish <- tokens(tokenwordfish, remove_punct = TRUE)
tokenwordfish <- tokens(tokenwordfish, remove_numbers = TRUE)
tokenwordfish <- tokens(tokenwordfish, tolower(tokenwordfish))

#dfm
corpusdfm <- dfm(tokenwordfish)
corpusdfm <- dfm_trim(corpusdfm, sparsity = 0.98)
corpusdfm <- dfm_wordstem(corpusdfm, language = "english")
corpusdfm <- dfm_remove(corpusdfm, stopwords(kind = "en"))
corpusdfm <- dfm_remove(corpusdfm, organisationavne)

#wordfish
wordfishtmod <- textmodel_wordfish(corpusdfm, dir = c(102, 208))

#CI wordfish
(tmod1 <- textmodel_wordfish(corpusdfm, dir = c(102, 208)))
summary(tmod1, n = 10)
coef(tmod1)
predict(tmod1)
predict(tmod1, se.fit = TRUE)
predict(tmod1, interval = "confidence")

#create dataset for theta
alldata <- cbind.data.frame(alltxt, wordfishtmod$theta)

#wordweights
wordweightdf <- data.frame(wordfishtmod$features, wordfishtmod$beta, wordfishtmod$psi)
```

```
#define quantiles
q = c(.00, .25, .50, 0.75, 1.00)

#remove outliers
remove_outliers <- function(x, na.rm = TRUE, ...) {
  qnt <- quantile(x, probs=c(.25, .75), na.rm = na.rm, ...)
  H <- 1.5 * IQR(x, na.rm = na.rm)
  y <- x
  y[x < (qnt[1] - H)] <- NA
  y[x > (qnt[2] + H)] <- NA
  y
}

library(dplyr)
#calculate quantiles by grouping variable
quantiles <- alldata %>%
  group_by(group) %>%
  summarize(Min = quantile(`wordfishtmod$theta`, probs = q[1]),
            quant25 = quantile(`wordfishtmod$theta`, probs = q[2]),
            quant50 = quantile(`wordfishtmod$theta`, probs = q[3]),
            quant75 = quantile(`wordfishtmod$theta`, probs = q[4]),
            Max = quantile(`wordfishtmod$theta`, probs = q[5]))

#mean
meanplot <- alldata %>%
  group_by(group) %>%
  summarise_at(vars(`wordfishtmod$theta`), list(name = mean))
mean(wordfishtmod$theta)

#se keyword analysis
#kwicdf <- kwic(tokenwordfish, pattern = "wte*")
View(kwicdf)

#export
alldataexport <- cbind.data.frame(alldata$doc_id, alldata$group, alldata$`wordfishtmod$theta`)

#exportdocuments
#install.packages("writexl")
library("writexl")
write_xlsx(alldataexport, "~/Mie/EED\\alldataexport.xlsx")
write_xlsx(wordweightdf, "~/Mie/EED\\wordweights.xlsx")

#models
textplot_scale1d(wordfishtmod)
boxplot(alldata$`wordfishtmod$theta` ~ alldata$group, ylab = "Policy Position", xlab = "Type")
plot(wordfishtmod$beta, wordfishtmod$psi, xlab = "Word Weights", ylab = "Word Fixed Effects")
```

Appendix F – Wordfish Relevant Results

The following consists of relevant results found in the quantitative analysis of policy positions on both REDII and EED. The results consist of 1) quartiles, 2) mean, and 3) confidence intervals for the Danish interests, IIA's, final proposal on REDII, and final proposal on EED.

REDII Interquartile Range

Group	Min.	Quar25	Quar50	Quar75	Max
Academic	-0.468	0.207	0.143	0.271	0.379
Bus. Ass.	-3.85	0.041	0.315	0.491	0.715
Company Bus. Ass.	-4.07	-0.138	0.311	0.474	0.844
Environmental	-1.20	-0.013	0.175	0.396	0.638
IIA	0.215	0.215	0.215	0.215	0.215
NGO	-0.780	0.083	0.281	0.410	0.703
Other	-0.863	0.030	0.267	0.371	0.595
Public Authority	0.078	0.368	0.429	0.493	0.606
REDII	0.179	0.179	0.179	0.179	0.179

REDII Means

Group	Mean
Academic	0.0313
Bus. Ass.	0.148
Company Bus. Ass.	-0.296
Environmental	0.106
IIA	0.215
NGO	0.186
Other	0.161
Public Authority	0.401
REDII	0.179

REDII Confidence Intervals for Danish Interests' and the Commission's Policy Positions

Confidence Intervals	Lower	Position	Upper
IIA	0.1696	0.215	0.260
REDII Proposal	0.1624	0.1795	0.1966
Danfoss	0.3709	0.4501	0.498
Danish Energy	0.3408	0.3937	0.4467
Confederation of Danish Industry	-0.3509	-0.0735	0.2039

EED Interquartile Range

Group	Min.	Quar25	Quar50	Quar75	Max
Academic	-0.234	-0.151	-0.069	0.236	0.542
Bus. Ass.	-2.63	-0.111	0.388	0.763	1.04
Company Bus. Ass.	-0.937	-0.0444	0.359	0.670	1.10
EED	0.616	0.616	0.616	0.616	0.616
Environmental	-2.60	-1.90	-1.09	-0.403	-0.0681
IIA	-0.273	-0.273	-0.273	-0.273	-0.273
NGO	-7.27	-0.711	0.139	0.597	1.05
Other	-1.69	-1.48	-0.507	0.230	0.827
Public Authority	-2.98	-1.0	-0.905	-0.529	-0.366

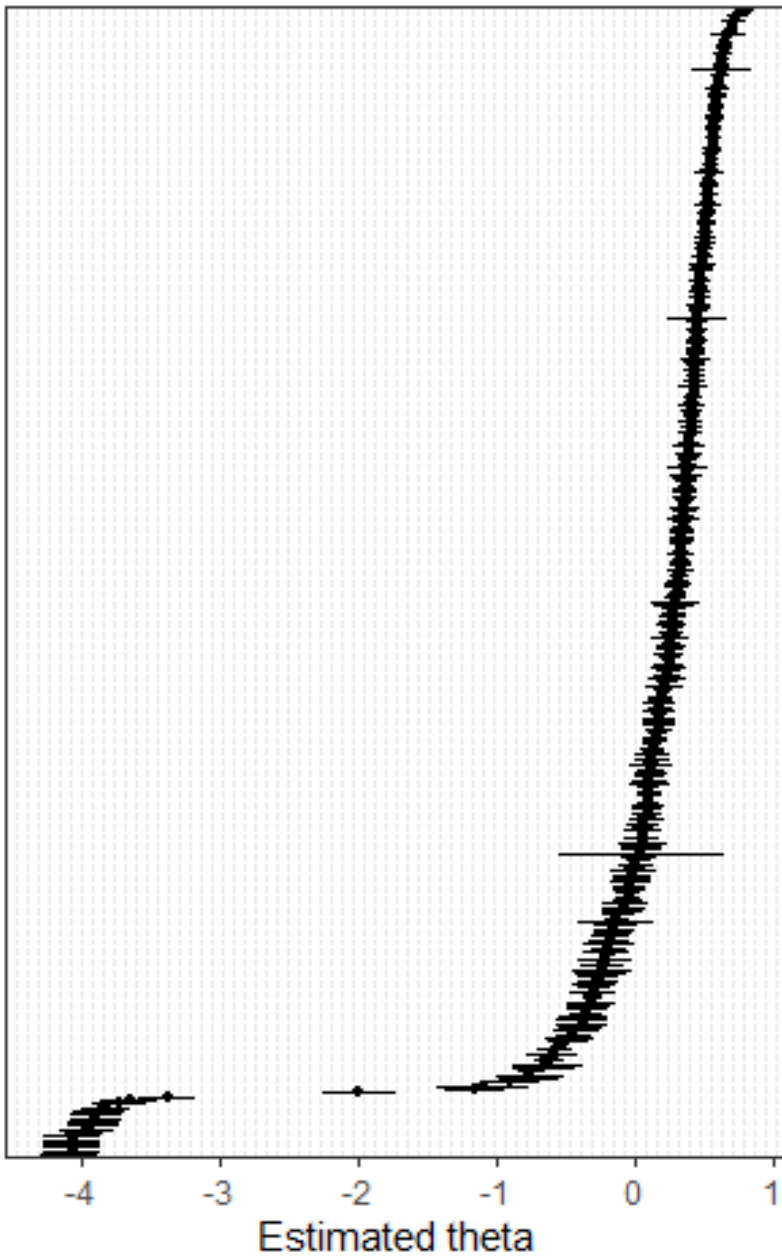
EED Means

Group	Mean
Academic	0.0797
Bus. Ass.	0.186
Company Bus. Ass.	0.288
EED	0.616
Environmental	-1.21
IIA	-0.273
NGO	-0.403
Other	-0.535
Public Authority	-1.04

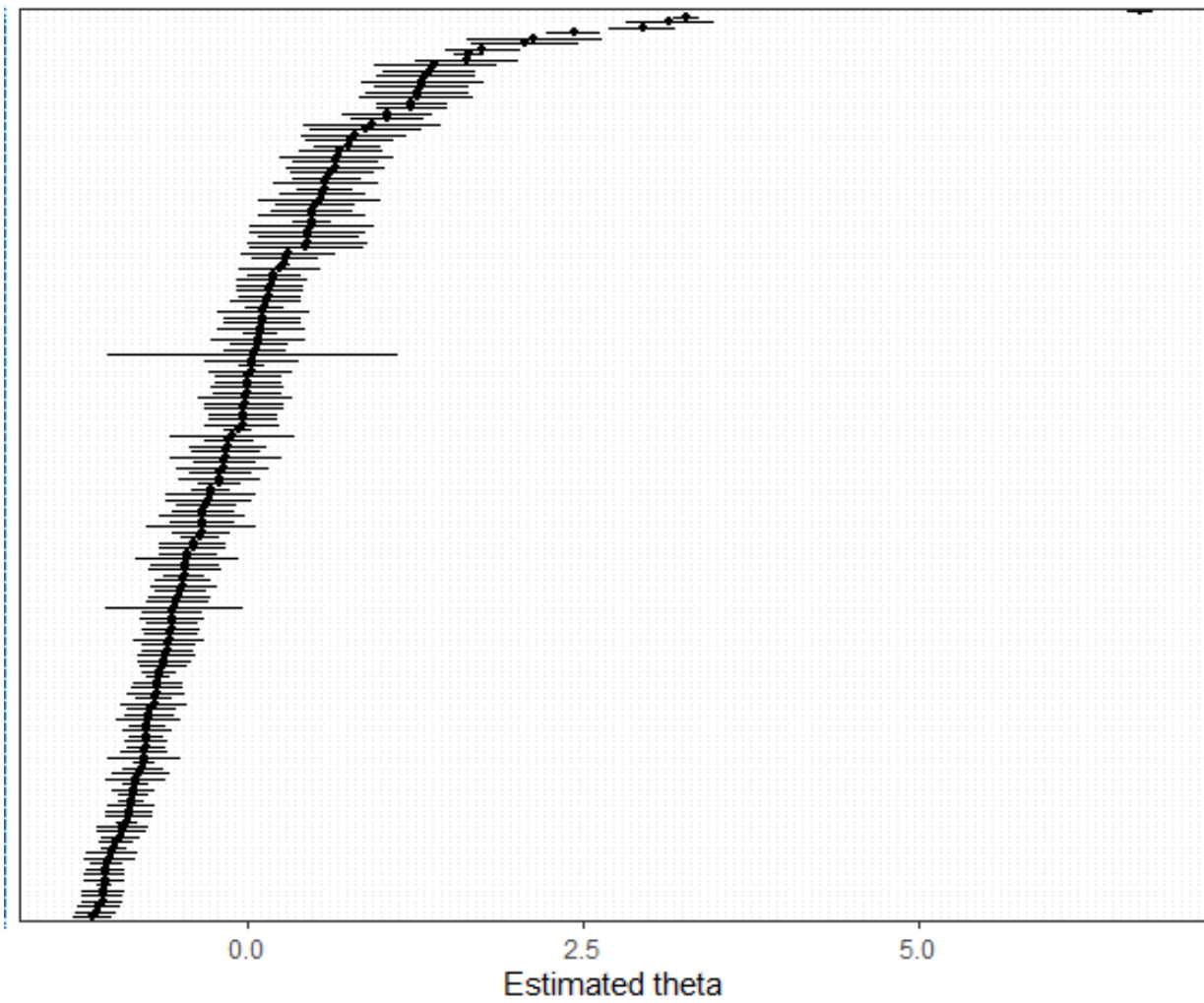
EED Confidence Intervals for Danish Interests' and the Commission's Policy Positions

Confidence Intervals	Lower	Position	Upper
IIA	-0.3638	-0.2728	-0.1817
EED Proposal	0.6065	0.6164	0.6263
Danfoss	0.6452	0.7012	0.7571
VELUX	0.1519	0.2634	0.3756
Confederation of Danish Industry	-0.4841	-0.2245	0.0351

Appendix G – Estimated Policy Position of All Interest Representations' Feedback on Renewable Energy Directive II



Appendix H – Estimated Policy Position of All Interest Representations' Feedback on Energy Efficiency Directive



Appendix I – Interview 1 with Maja Kluger Dionigi, Expert on Lobbyism in EU and Senior Policy Adviser of European Affairs at Confederation of Danish Employers

Please present yourself, your research on lobbyism in EU, and your position in both Think Tank Europe and Confederation of Danish Employers?

In Think Tank Europe, I worked with a lot of different topics institutionally, for instance, Brexit's impact on Denmark. In DA, it is about interest representation within EU social and employment policies, where my responsibilities concern the free movement of people and services. I am placed primarily in Copenhagen, but I travel a lot to our Brussels office. In my position I monitor what is going on within the area and then inform the members of what we are aware of. Our largest members are DI and Danish Chamber of Commerce, and it is primarily their interests that we represent in EU, and it is primarily them that give us our mandate to lobby on their behalf. DI is quite pro-EU on all other areas than employment, where they are rather skeptical towards all potential EU legislation. So, my job is both on getting a mandate from the members and informing the members on our work, and it is on trying to influence the legislation both in the Commission but primarily in the Parliament. Our area has moved from being very sector specific to be a part of a lot of policy areas. For instance, the EU has proposed to establish an EU climate fund that also have social aspects. We in DA focus on the relations between employers and employees. Conversely, to your area of interest, there is a strong attitude from Danish interests on trying to limit all EU legislation on this area, but where it can be really difficult to get Danish interest representation in the agenda-setting phase, because of the lack of Danish representation especially in the Council.

Is it possible for Danish interests to influence EU legislation or is it difficult because Denmark is a small country?

It depends on the area. Within the green transition agenda, it is much easier for Danish interests to gain influence because we are a leading country in this area. In other areas it is a lot harder, and here it can be hard to influence the decision making, as Denmark has a very different system within, for instance, the labor market and part of a minority rather than the majority.

Do Danish positions weigh higher within policy areas such as climate and energy, where Denmark is considered to be leading country compared to other policy areas?

I would say so, but it is also dependent on the constellation of countries within the Council, for instance. Within the climate area, Denmark is part of a majority alliance, but within the area of employment, Denmark is part of a minority alliance, especially following Brexit, where we have a harder time of influencing the legislation to the Danish benefit. Energy efficiency and renewable energy is a highly prominent area at the moment. In my book on Lobbyism in the European Parliament, I had one climate case concerning the reduction of CO₂ emissions from trucks that was part of EU's climate package from 2008. In this context, I have read a lot about EU's climate policies, and the Commission together with the Parliament are viewed as proactive and green institutions compared to the Council. Hence, when the Commission adopts a proposal, the Parliament usually wants even more ambitious climate targets in the legislation and conversely, the Council wants a lot less ambitious climate target, where it ends up a compromise between these two institutions. But usually, the Commission and the Parliament are institutional allies generally speaking within the climate agenda. Then the Ukraine war may also pose as a window of opportunity for the green agenda to make EU independent on Russian gas by increasing the renewable energy targets. Danish interests have a beneficial position, because Denmark is a leading country within the climate agenda and looked to by other nations even though Denmark is a small country, we are "punching above our weight".

What is your experience with the influence obtained by Danish interests in EU?

My research has been wider than looking at Danish influence. It has, for instance, been on the aftermath of Brexit, the establishment of EU's health union, etc. I have also early on in my career researched the role of the European Affairs Committee in the Danish Parliament and providing the government with a mandate in EU negotiations. All my other work has been focused on the EU and not specifically on Danish interests.

Are there any underlying mechanisms for why some interests are successful in gaining influence on EU legislation while others are not successful?

In my book, which was also my doctorate, I had a focus on four cases and whether they were successful in gaining influence in the Parliament. Here, I found that the success of influence can be explained through what I call III, which is Institutions, Issues, and Interests. If the constellation between these three factors is in the right way in the Parliament, then there is a good possibility of

influence. But this primarily concerns the Parliament and the committees within, because the possibility of influence depends a lot on the specific committee, but it can also be suitable for the Commission in terms of what DG that sits with the legislation and whether it is only one DG that sits with the legislation, which makes it easier to influence their position, or if it is different DGs, where their focus differs a lot. Then there are the questions on the interests both concerning how early you begin lobbying, if there is a common interest or disagreements in the organization that slows your lobbying efforts, and how strong are the competing organizations that do not have the same interests as you. The last factor of issues concerns how politicized the policy area is. The more politicized the area is, the harder it generally is to obtain influence, because there are too many interests and too many conflicts. However, if the politicization is in favor of your interest, it can be beneficial for your interest that there actually is this higher politicization. For instance, within the climate, it can be a great factor of success whether the Commission's position is relatively close to the position of your interests and the amount of lobby coalitions.

Does the number of resources that an interest representation have impact the success of influence?

Definitely. Both the amount of knowledge as well as expenditure have a great impact on the acquired influence. Also, how many interests that are a part of the lobbying coalition means a lot, because it is more difficult to get influence if you are a part of the minority group of interests. The political context is also important for influence, where in these days it is easier to promote the green transition than vice versa because the political context is an ambitious green agenda.

Can interests obtain influence by merely submitting feedback to the consultations in the Commission or do they need to engage in order strategies?

Interests must do a lot more than just submitting feedback. It is easier to submit consultation feedback, and a lot of organizations and companies only submit consultation feedback and nothing else. However, the consultation feedback does show the Commission that you have an active interest in the area. A lot of interests provide feedback to the Commission's consultation but stop engaging in anymore lobbying following their submission. This includes both in the Commission and in the Parliament. Informal meetings are really important in order to gain access but also make the EU institutions aware that you have a strong interest on the area that is worth listening to. You should not view the EU institutions as completely separate. As interest representation you can try to impact the Parliament through the Commission or vice versa, as it is beneficial to be involved in the process as

early as possible. Hence, a lot of influence happens on an informal basis and the influence also happens through so many different channels. Consultation feedback is just one element, then there are the expert groups in the Commission, the informal meetings, lobbyism through the European alliances, as these are also used a lot through their very legitimate platform, as they represent interests from all over the EU. Usually, it is the European alliances that are in the expert groups and consultative entities. Having an office in Brussels makes the organization 2.5 times as likely to influence the work of the Commission, which also shows how important presence and network is to gain access. It is also possible to try and influence the Danish government, so the government supports the position of the interest organization by submitting their own opinion to the Commission on the early legislative proposal. It is the European Affairs Committee in the Danish Parliament that decides whether to submit an opinion on the legislative proposals. This is also a way in form interest organizations to gain access to the decision making but also finding out if The Danish Parliament is in line with the position of the respective interest group if they have provided an opinion.

Does a lobby strategy have an impact on whether the interest representation can gain access to the Commission's decision making process?

You can use different strategies, but it is important to seek compromises. In my research to my PhD, I found that some organizations are too extreme for instance Green Peace, where it is "free" for them to have an very ambitious but also extreme position, where they were not interested in seeking compromise or meet each other halfway. Hence, if an organization has a position that represent what you believe in but also is able to be part of the political reality, takes into account what is actually possible, and is willing to compromise, then there is a greater opportunity for influence than being extreme. Usually, it is just easier to influence the decision making if your position is somewhere around the middle. Another requirement is to have both long-term and relevant contacts in the institutions that you can depend on when an organization wants to obtain influence as well as asserting influence and relevance as early as possible in the decision making process. Sometimes, the interest representation also coordinates their lobby strategies internally, for instance, in the European alliance, to help each other get their most important recommendations on the agenda.

What are the pros and cons of lobbying the Commission compared to other EU institutions?

There are large differences between the EU institutions. In the Commission, interest involvement is a lot more structured than in the other EU institutions. Conversely, in the Parliament, there are no rules

on making consultations or participate in specific meetings. There, it is totally up to the individual MEP on what they want to do, creating a pluralist way of lobbying the Parliament compared to the Commission. The only notion in the Parliament's rule of procedure is that the MEPs have to listen to a wide variety of interests, but no one enforces that that is actually happening. It is in the Commission that the conditions for interest involvement are the most regulated, as it is a requirement to make consultations, expert groups and consultative entities need to be involved, and then it is up to the individual member to find out who they want to have meetings with, which makes it a neo-corporatist set-up in the Commission. Hence, in many ways it is easier and more structured to lobby the Commission, also because the Commission is a bit more compromise seeking with the interest representation than both the Parliament and the Council. But it is important to engage in lobbying in all the EU institutions but in different ways. The Council is more difficult to lobby, because the positions in the Council are determined nationally, so a lot of the lobbying efforts are done at the national level and towards the Permanent Representation in Brussels and then try to influence the positions of other Member Countries through the European associations. So, the amount of lobbying within the Council as an EU institution is a lot smaller than within the Parliament or the Commission. The Commission is a really important institution to lobby, because it is the first mover, it is the agenda-setting institution, but it is still important to keep up the lobbying efforts following the Commission's adopted proposal, as a lot can change in the Parliament and the Council.

Does the success of an interest's lobbying strategies depend on the type of interest representation they engage in?

Being part of a large lobby coalition and being member of a European association impact the possibility of success, because as your interests are represented through different channels, both by their own efforts, through the European association and through your own contacts your exposure also increases. Third party-representation may be less beneficial because you do not have different channels to make use of.

Appendix J – Interview 2 with Anne Birk Mortensen, Policy Adviser on EU affairs, Danish Chamber of Commerce

Please state your key responsibilities as policy adviser on EU Affairs at The Danish Chamber of Commerce?

I am senior policy adviser for The Danish Chamber of Commerce in Brussels. This means I represent the interests of The Danish Chamber of Commerce and our 18,000 members and associations in Brussels. I am a generalist for the political work but specialist within the EU processes, which means I know how we best influence the EU process in the different cases we have. So, my role compared to my colleagues' role at Børsen (in Copenhagen red.) is that I advise on how the EU process works, how we best represent cases on behalf of our members, as well as larger and more general cases. I monitor at all times what happens in Brussels and what we should be aware of at the office in Copenhagen in terms of Danish legislation, how directives and regulation can impact Danish legislation later on.

Who does The Danish Chamber of Commerce represent and how do you represent your members and their interests in EU?

We have 18,000 members so we have a position and opinion on everything. In most cases a proposal to a new legislation or revision is presented, which we read through and then we state an opinion on that. However, before that there is a consultation consisting of an early consultation, where the Commission presents an inception impact assessment, which is followed by a public consultation, which we also submit a position. This can be of different character such as a questionnaire or an opinion we submit, and often it is those working at Børsen who are experts that are advised. We have a climate energy team, and it is them that know our members the best. They are also experts on the area and have worked in the Danish Ministry for Climate, Energy, and Utilities and other relevant places like that. These people are political and have the technical knowledge on the area, which is why they can tell what our overall opinions are on the area. Then they ask our members if there is a specific parts or cases of that article that they want us to dig into and if there is someone tangible that should be changed in the proposed articles. Or at an even early level we ask the members if they want us to recommend something before a proposal is presented to impact how the legislation is proposed. So, I have a close cooperation with my colleagues at Børsen as well as our members both from our networks but also at the conference where I make presentations, for instance, on what the EU is

presenting, what we should be aware of. So, there are different ways to represent the interests of our members also in the EU process.

There is interest representation in the EU Commission before a proposal is presented. Here we have, for instance, presented our opinions on the "fit for the future" which is a platform within the EU Commission, where our boss, Lasse, is and represents interest from this platform. There is also the EU Clean Air Forum, where we through the government conduct interest representation and where we also sometimes deliver cases to if we want to do interest representation on Denmark's behalf. Then if everyone in that group agrees on a topic of interest then it will typically also become the opinion of the government, and then through that we have gotten a contact to the Council from the early beginning of the legislation. This we have done several times. Or else it is providing opinions on the Commission's consultations, then a proposal is presented and so forth in the regular EU process.

Regarding the revision of the two energy directives, did you ask your members if they had any input to the opinions you have provided on their behalf? Did the government support your opinion?

First of all, it is a historically large legislative package. There are 14 initiatives in total in the Fit for 55-package, so there was run on the work for us with a lot of press conferences in the summer of 2021. We made a fact sheet on what the initiatives concerned which we sent to the Danish MEPs and those in the Danish Parliament that works on EU cases and within climate, and we sent the sheet to our largest members, and then from this we made our initial take on the initiatives. Then we take contact to the Parliament on who of the MEPs that goes on with the initiatives.

REDII is quite interesting, because six months before the proposal, Morten Helveg was the lead on an own initiative report on Offshore Wind which is very much in line with the revision of REDII. There was actually a Danish trio consisting of Morten Helveg, Pernille Weiss, and Niels Fuglsang. Hence, these were the three we tried to contact on the area of REDII, which is in process now and it is also them that are lead on the issue in the Parliament, where we provide some specific member cases to the MEPs on how REDII impacts them. So, we try to impact the process by challenging some parts of the proposal together with our members and colleagues. And then it is also good old-fashioned lobbying on participating in meetings and figuring out the opinions of others and how our opinions relate to each other. But it is also quite a two way contact because it is both about what our opinions are but also about what the legislators and politicians need? What angle do they need? Because these

proposals are really comprehensive. Fit for 55-package is large but also REDII and EED by themselves are quite wide in their legislation. Hence, the lead cannot focus on every part of the legislation. For instance, Morten Helveg has one particular focus and then we must try and coordinate with the other MEPS from other Member States on which of their areas of focus that we can assist indirectly.

When regarding your work in the Commission, does the Danish government support your position on REDII and EED? Are you on the same level as the government or does the government want to go in a different direction than you?

I do not think that we were far off from each other. We also have meetings with the Danish Representation in Brussels, who also are quite aligned with our general position and also when they participate in negotiations.

What was the process behind your decision to submit positions on the Commission's two consultations on both directives?

Generally, I, as an EU lobbyist, recommend answering these consultations because often there are follow-up rounds, where the Commission chooses some specific stakeholders to participate in particular meetings to provide some extra feedback. These meetings are really beneficial to participate in, because you also gain contact to the civil service that makes the legislation. Hence, submitting feedback to the consultations is a way to obtain access as well as showing our members that we are aware of the legislation and we have marked our position in this way, and if they want us to do more then we can take another step. So, it is both in relation to show the Commission that we are interested on the topic and that we would like to offer more opinions, and later on the process gain easier access to the civil service by making them aware of their position and asking for another meeting.

Did you have a lot of meetings with the Commission and the DGs?

We have had a lot of preliminary meetings on the Green Deal in general, because the deal is so extensive. These have been with different DGs. But The Danish Chamber of Commerce is also member of Digital Europe and Digital Commerce, which are European associations. Digital Europe deal with all things digital but also have a lot of American members. Europe Commerce is all about commerce and trade, it is like The Danish Chamber of Commerce but with a greater focus on trade and retail trade. We have through them also held a lot of meetings in the Commission, so a lot of our meetings are through these European associations. In these meetings the Commission provides their view on the

case and ask for feedback, and then the Commission adjusts their proposal. We have participated in a lot of these meetings on a lot of the files. After the Commission presented the legislative package on July 14th, 2021, we had our climate and energy team stop by in Brussels for two days, where we had meetings with the Commission again for be able to ask follow-up questions to the proposals. It is primarily the civil service that we asked these questions to and not as must the Head of Unit.

Anything presented in the initial meetings with the DG, was that the same information that is in the IIA that you based your knowledge and meetings on, or did you gain some more technical and detailed information on how a potential proposal would look like?

It is the IIA primarily but in Brussels, there is often leakages on files and drafts that the DG is working on which also happened in this case, so we knew what they were working on at an overall level. Further, seven of the proposals are revision so you know the starting point of new legislature and you somewhat know which way they want to go. It was then on the technical level that changes in the proposal happened.

Have you been able to impact the proposals? Is there anything you can pinpoint that you have been a part of getting implemented in the final proposals?

No, not really, because the position we have, we share with a lot of other interests. We have proposed changes and we can also see that the changes have happened, but we cannot know that it is in particular us that has gotten the change implemented. We were a part of the meetings, and we can see that some of the things we recommended changing has been implemented, but whether it is us, somebody else or just the pressure of a lot of stakeholders, we simply do not know. That is just a part of the lobby job description, you cannot always know what you influenced or other did on behalf of you.

Are you part of other European associations than Digital Europe and Europe Commerce? For instance BUSINESSEUROPE?

No, we are not a part of BUSINESSEUROPE. But through time you get to know a lot of people also working for BUSINESSEUROPE or at AM Chambers, so you know each other, and you know what they are doing, and we also sometimes get their policy positions sent to us, but we are not members.

Were you able to influence the positions of Digital Europe and Europe Commerce on the directives?

Yes. We were more successful in Europe Commerce than in Digital Europe, because Digital Europe is a lot of Big-tech, which becomes more technical on the digital part, for instance, about data storage, and how that could become more energy efficient, which we do not have a position on, so we just let them take the lead and supported the position

How did you represent your own and your members interests towards the Commission to influence the final legislative proposals? Did the members present cases to you on how legislation can affect them?

We try as much as possible to take time to represent the interests and also the sooner the better, and also before a proposal has been presented. This we do by participating in the meetings by Europe Commerce and Digital Europe. But it is also about making our members aware of new legislation that is coming and that this may mean this and this, and then we try to get the members to give us some specific cases we can present to the Commission, but it is really difficult because it is fluffy and still on an EU-level. Usually, it takes around five years before it gets implemented, so it can be hard for the members to relate to when the Commission has not presented anything specific. But we try. That is why it is useful that there are these early consultations and IIAs, which can either be very adequate or written on an overall basis with not a lot of detail. The IIAs in the climate and energy policy areas have actually been quite useful because it makes us aware of what we should focus on.

Do you get anything else initially than the IIAs?

No, we only get the IIAs to make our opinion on and then we can try to contact the unit that has made the IIA to ask follow-up questions, and then we have the meeting though Digital Europe and Europe Commerce and then we answer both consultations

What are pros and cons for companies and organizations to get their opinions represented by you instead of doing the lobbying themselves?

One is in a stronger position. Brussels is big as the Commission is really big. Reviewing how many answered REDII and EED, then your one policy position as one individual company, you would have to be a large company to be able get your opinion to weight more than e.g. The Danish Chamber of Commerce's opinion, where we are 18,000 members, the second largest business organization in Denmark. Another benefit is that we do not do it alone either. We sometimes coordinate with

Confederation of Danish Industry and Confederation of Danish Employers, other Danish/Nordic interest organizations, but also with our own interest organizations, so we have e.g., all of Europe Commerce and Digital Europe that have hundreds of thousands of members. It just weighs more when the Commission reviews the feedback submissions. It is also about putting your interests in different channels. But, on the other hand, it is also useful to come up with individual business cases and bring up something specific.

Did you have a specific lobbying strategy to obtain influence?

It is very different from policy area to policy area. When representing interests we can do it through the Danish government, through the EU Clean Air Forum, through the Commission's Fit for the Future-platform. For instance, within the climate and energy policy area, it can be really difficult to lobby because it is so technical, so when lobbying you also need to have a lot of technical knowledge. You can always say that it should be greener, better, more sustainable and things like that, but so what? Hence, part of the strategy is to also just show that we have a position. Then when we get something more specific such as the impact assessment, we can go back to our members to try and activate them as early in the process as possible, even though it can be difficult because we do not know what is coming. So, we try to make time for interest representation, but it also depends on the other clean package positions and within the Fit for the Future, if there is momentum to make a case, or else we have to take it ourselves.

What was your target for providing the policy positions to the Commission? What was a success?

We make these policy positions to show our position on the area and show that we are interested in the issue. It is both to show the Commission that we are interested in providing feedback and have a dialogue on how a potential proposal could look like. It is also to show our members that we are aware of the legislation, and we know that it is an important issue for the members. It is also about showing a lot of presents at an early stage and having momentum at a later stage in the decision making process.

From my research it seems like you submitted your own feedback to the Commission on REDII but have provided your position through “Energisparerådet” in a submission to the Minister for Climate, Energy, and Utilities on EED. Why did you choose to do two different strategies for influencing the legislation?

It is partly random and partly because you through a coalition have a stronger position. But it does not have a lot to do with the lobbying happening here in Brussels or how we lobby the EU institutions.

Were you, in general, positive on both the IIAs and the proposed directives? Were there elements you did not want to be part of the proposal? Or were you generally satisfied with the final legislative proposals by the Commission?

We have been generally positive towards both the directives. We were both positive in the initial phase but also when the final proposals were presented. There were a few technicalities that we wanted to change a bit, but overall pretty satisfied. Also, that all the legislation has been put in the fit for 55-package and evaluated simultaneously is beneficial, because it is interconnected. It was a lot of work, but it made a lot of sense. Following there has been a focus on gas and oil and also the Directive on the Energy Performance of Buildings.

Is it easier to gain influence within areas such as climate and energy, where Denmark has a leading position?

I have not really thought about that before. There is not a “Danishness” around me when I talk about energy policies. We do have some more momentum on the area because of how we do things. Other parts of the energy policy area such as ETS is more geopolitical, where it is the Member States that negotiates. Here, Denmark's position is highly weighted in the Council. But in the Commission, it does not mean that they listen to me more just because I am Danish.

Conversely, is the Commission listening to your input in general? Is it possible for Danish interests to influence the legislation or is it difficult due to our country's small size?

They definitely listen. Especially due to our cooperation with the European association, then we have a voice that weighs more. So, it is much about what channels we use. But it also depends on the policy area in issue and whether it is highly technical such as the energy policy area. But if you do bring technical knowledge and solutions, the Commission will listen to our position just as much as other positions.

What is your process for obtaining the influence you achieve to gain on the final legislative proposals? What are the underlying factors for being successful?

Relations and network are key. It is about being able to participate in meetings with the civil service, members of cabinet and such to maintain a dialogue on the proposals. One thing is submitting formal feedback to show the Commission we are interested in the area, and then we afterwards contact them to ask about the legislation. So, it is about maintaining a dialogue both before and after a proposal is adopted. We keep asking questions on why the legislation was made in this and this way, as it enables us change our position before the Parliament and the Council, because the few things we did not get implemented into the proposal, we can try to get through in the other institutions and get it through the trialogue. So yeah, it is about good relations you can contact and have a dialogue with. There is a lot of two way communication, as it just as often is them telling us what they have considered, and we also benefit on knowing their positions to know what we should keep in mind. Lobbyism is dialogue and not monologue.

How many meetings did you have with the Commission?

Most of our meetings were with the European associations and generally on the package as a whole, but we have had between 10-20 the last couple of years, so it is not that much. Sometimes other organizations host web shops, where you can ask questions, for instance, BUSINESSEUROPE has held a web shop, but this is more informal.

Did the different members in your coalition with Digital Europe and Europe Commerce generally have the same position on the directives or were there some inconsistencies on where you wanted the proposals to go?

We were pretty much on the same level overall. The process is that we send our policy positions in, then e.g. Europe Commerce merges them, and the final result was that we all had similar positions. There have been some minor things, but overall, we agreed.

Appendix K – Interview 4 with Thomas Martinussen, Senior Vice President of Clipper Bulk A/S

Please present your position and key responsibilities?

Starting with me and my position and Clipper, I have been working here for 18 years. I am senior vice president and Head of legal and corporate affairs. I specifically sit with legal affairs and affairs that generally impact of company and operations. I am also part of the legal workforce of Danish Shipping, our business organization. As part of the overall management there are a lot of different kinds of affairs. Clipper is shipping dry cargo and has done so since the 1970's, where Clipper was founded by Torben Gülnar Jensen. It is a family-held shipping company. We also have business activities in other areas, but the primary activity is shipping of dry cargo, for instance, corn, coal, steel, etc. We do shipping all over the world.

When traveling globally, do you also have a lot of business activities in EU? Both in terms of the EU institutions but also activities in the Member States?

Yes, we do. We ship to and from EU countries. For instance, we ship a lot of steel from Europe to the US. It is one of our big niche businesses, where we are focused on shipping from Europe, more specifically from Antwerpen. But, in general, whenever our customers want something shipped, we do it no matter where in the world it needs to be shipped to and from. We do not have a lot to do with the EU institutions in our general business activities. This kind of work, we have outsourced to Danish Shipping.

Why are you member in Danish Shipping instead of doing the interest representation yourself?

We are not a very big company. Hence, we do not have a part of the company that specifically monitor policies, legislation, and what could be important for us at some point, which some large companies do have. We use our membership of Danish Shipping to do this instead of us and that represents our interests in EU, and we are very satisfied with the job that they do. So, we have chosen Danish Shipping to represent our interests in EU, because we do not have a large enough size to prioritize doing it ourselves. This is the same for many of the members in Danish Shipping. They do have some large shipping companies as well such as Mærsk that do have a department that only sits with the political part of shipping and do lobbying, but I think that that is only a few other shipping companies that do that by themselves. The membership also provides a network and makes it possible to share

your experiences and challenges that we all can have within the field. I generally experience that we all have a good collegial cooperation even though we actually are competitor. This is, because we often have the same challenges around the world, where we have more in common with other Danish shipping companies than shipping companies of other countries, because we have a common attitude generally on how things should be done. There are some issues that we as Danish or Nordic shipping companies cannot accept that shipping companies from other countries do not have a problem with accepting. So, us Danish shipping companies generally want to try and raise the bare for the whole sector globally.

Is this “raising the bar” also concerning the green transition?

Yes, exactly. Danish shipping companies typically have a more modern navy than our international competitors, and we typically have a greater focus on the green transition. There are greater expectations from the society that we take a stand on the green transition and take action to become sustainable in Denmark compared to other places. So, we would like to help raise the bar and raise the standard within all shipping globally and not just in EU. That is also the opinion of Danish Shipping that they want to help pushing for a green transition and set up higher demands to the industry but globally and not just on a regional or national level, because then there will be a distortion in the industry. In FN, we have an organization called IMO, International Maritime Organization, which is where a lot of actions within the shipping sector is discussed. But IMO is just slower to implement changes even though it would be the most ideal that they did raise the bar globally.

Do you cooperate with other organizations both within Denmark and European organizations in EU?

It is primarily through Danish Shipping that we get our interests representation and obtain knowledge on what is happening within legislation in the maritime sector. We have subsidiary in England, which is member of the English equivalent of Danish Shipping. We are also part of FN's UN Global Compact, which is UN's way of trying to get companies to engage in CSR. We are not member of any European associations, but Danish Shipping is part of a European Shipping association called ECSA. So, if any legislation or revision is about to happen in EU, then it will be discussed in the European association

How big of an impact does EU legislation have on your business activities? What is your process when new EU legislation is made?

With the size we have, there is not a designated employee that only monitors legislation that can impact our business. We do not think that we as a small company can influence politicians and political institutions by ourselves. It is very rarely that we as an individual company contact legislators or try to push for a certain agenda. It has happened but years go by without it happening. So, we try to gain influence through Danish Shipping, because we then have a greater voice and we are certain that they will know if something of relevance is coming up, because it is their job. There are a lot of policy areas that could be interesting to know about, but it is simply impossible for us to monitor all policy areas that potentially could be of relevance. Also, as long as the new legislation that is implemented applies to everyone in the industry including our competitors, then we are all coming from the same starting point, so we accept it and try to deal with all requirements best possible.

You mentioned that you are very satisfied with the work done by Danish Shipping on your behalf. What happens if there are disagreements among you members on what your positions are within an area?

Danish Shipping often responds to consultations in EU. Sometimes, they do the feedback by themselves if they pretty much know what is important. Sometimes they sent the consultation answer to us members, and it is typically the relevant workgroup in Danish Shipping that provides feedback to Danish Shipping on what the overall position should be. There are a lot of different workgroups, such as a legal workgroup, where I am one of the members, a technical workgroup, where EED and REDII have been discussed, and other types of workgroups. There are at times areas where the members of the workgroup do not agree, but you try to find a consensus, and if that is not possible, then it is generally the majority that decides the final position. However, the size of the company also matters to some extent. For instance, Mærsk undoubtedly has a large voice in Danish Shipping.

In Danish Shipping's consultation response it is evident that they think that it is difficult to implement a fully green transition of the maritime sector. Does Clipper think that a green transition is possible within the maritime sector? How should it be done?

The green transition is definitely possible. There is no way around it, because we all have to do it. It is just a really big task, and we also do recognize that there are some challenges, because the usual types of renewable energy is not possible for our sector at this stage. In shipping, you need assurance that

the ship at all times will be able to sail due to security reasons and safety for the crew. So, it is very important that the type of energy that is used is constant. Hence, we probably will need to find a way to use fuel of some sort. There are a lot of work happening to find alternative types of fuels than using oil. It is still in the preliminary phase, where some look at methanol, biodiesel, LNG. Some also consider electricity, but that is only possible in short routes from A to B and know that you can recharge when you reach your destination. There are a lot of good initiatives on its way, but it is not yet something that is at a large enough scale that the whole industry can use it. We are quite excited to see what can be done and we fully support the research. There are a lot of workgroups on the green transition. We in Clipper also have our own little workgroup regarding decarbonization, where we look at all the regulation that has been adopted and requirements that will be implemented soon. For instance, we have ensured that we are ready for new requirements that will be implemented in 2023 and that we comply with the new regulation. Then we also try to use the opportunity to impact our customers and partners around the world to be more aware of how to comply with the green transition. We also try to see if the green transition can become one of our business areas by offering more sustainable shipping than our competitors. We try to find areas where we can push for change. It is positive that requirements are implemented politically, and it is also positive that we can work together with other companies to reach the goal of becoming more sustainable.

What is the legislation that is implemented in 2023?

The new legislation is that it is a requirement that we measure our emissions and report on it and then show that we improve our emissions year by year. It is not strict requirements, but there has continuously been implemented regulation on expanding the green transition. For instance, in 2020, it was implemented in e.g., EU that you have to sail with a specific type of oil that has a low level of Sulphur, because it decreases CO₂.

Since Denmark is a leading country within climate change, do you experience a pressure from the industry and do other countries look at you for inspiration on how to become more sustainable?

In my experience, bot pertaining to the green transition but also other areas within CSR, we in Denmark are typically a step in front of other countries, and it is often us that brings up areas where we can improve, also towards companies we cooperate with. We, however, begin to experience that since we have begun setting demands, then our partners have to relate to it as well, which starts a discussion that you would not necessarily have had if we had not brought it up.

What is your strategy to influence legislation?

Our strategy is to get our interest represented by Danish Shipping and let them do the influencing on our behalf. Occasionally, there is a very unique problem area that impacts our company a lot harder than other companies in the sector and then we try to influence the legislation ourselves. A tangible example is that we have engaged in the cruise industry. At some point the tax authorities decided that cruises are not included in the tonnage tax that the maritime sector is included in. We were the only maritime company that also engaged in the cruise industry in Denmark at that time. We did have a dialogue with Danish Shipping, and they also helped us on the area to get cruises included in the tonnage tax again, but we also used a lot of resources ourselves to try and change this new legislation by making contact to legislators, civil service, etc.

You have mentioned a lot of benefits of having your interests represented by Danish Shipping. Are there any disadvantages?

There are not really any disadvantages for us. The work they do for us, is not something we would have done if they had not done it for us. So, for us, it is only a win-win. It of course requires an effort for us to be member of Danish Shipping and participate in the workgroups and familiarize ourselves with certain issues, but it is definitely worth the time spend.

Since you are part of a workgroup in Danish Shipping, what is the process for you when you get a certain policy issue to consider and find a position on?

If there are some specific consultation responses, Danish Shipping sends these to us members in that particular workgroup by asking their opinion to the position that Danish Shipping has proposed to take, which we then have a dialogue on. We meet two to three times a year and discuss any issues.

How much influence can the Danish maritime sector have compared to the maritime sector in other, larger countries?

We feel like we have a say and can get influence on the same footings as other countries. We are actually not a lot of people working in the maritime sector in Denmark, but it is a really large industry in Danish exports. We in Denmark are really good at shipping in general and have been good at for a lot of years, so the politicians are well aware of that they want to protect it. This is also why we have this tonnage tax legislation, which definitely is a benefit. If we as an industry approaches the system

about an issue, then the legislators listen to our worries. But that also means that they have some expectations on our behalf that we behave nicely and do not cause a lot of trouble or scandals. It is a contract between us and the legislators that they have an understanding and willingness to maintain our business, but we have to act accordingly, which also characterizes our industry that we are proper. For instance, a lot of the Danish shipping companies are members of UN Global Compact, which is not the norm in a lot of other countries. For instance, when we became members of UN Global Compact, there were almost no American companies that are members of it, where there are a lot of Danish members.

Regarding EU, there are some Member States that are large shipping nations and Member States that definitely are not shipping nations. An example is Sweden and Denmark. Denmark is a shipping nation and Sweden is not. Conversely, Sweden has a big industry that depends on getting their products shipped. Hence, their focus is on what we call the shippers, so, they are fine with implementing strict demands on the shipping companies, where the Danish government and interests want to ensure that the shipping companies are accounted for as well. This is the case for all countries. A few Member States are large shipping nations in EU. These are Denmark, Greece, and somewhat England and Germany. Then a lot of the other Member States are fine with implement strict requirements, because it will not affect their country. This is how it is within all policy areas in the EU. Danish legislators and MEPs are good at stepping a foot down and trying to ensure that Danish shipping companies are not treated unfairly. Denmark in general is good at obtaining influence by having a constructive and pragmatic conduct. The interest representation also participates in alliances and partnerships, which Danish Shipping also do on our behalf. Danish Shipping also has an office in Brussels, which also enables them to engage in more European alliances.

Have you reviewed the position that Danish Shipping has provided on your behalf to the Commission?

No, we have not actually. We fully trust what Danish Energy has responded to the legislation on our behalf, so we have not checked the positions out.

Did you get any knowledge from Danish Shipping on the adoption of the final proposal?

No, this is also only sent out to the relevant workgroup and its members, and as we do not have a member in the technical workgroup, we have not heard specifically on REDII nor EED. However, we do try to keep up with the development of the legislation by being part of as many workgroups on decarbonization as possible in different organizations within Denmark.

Appendix L – Lars Olsen Hasselager – Head of Climate, Danish Shipping

Please present your position and key responsibilities?

In my position as Head of Climate, I have the technical responsibilities for the climate area in the organization. Hence, I monitor what is happening politically and technically. I coordinate with our members on what priorities we should have on legislative proposals on what is good, what should be changed, and if there is not a legislative proposal yet, then I talk to the members on what we should prioritize working on and what our position should entail. For instance, with the great amount of work there is in the Fit for 55-package, we have in coordination with our members decided on focusing on EU ETS and Fuel EU, where we share knowledge with the Commissioner and civil service in EU as well as in Denmark.

What kind of members does your organization represent and how do you represent their interests in EU?

We have around 90 members, who represent 75 percent of the Danish shipping sector. We also have a few other members that is placed within the energy sector. In my part of the organization, we are six people that consist of engineers that have the technical understanding and then people like me that sit with the political. Together we try to “build a bridge” between the technical and the political. Then when we work on our position on the directives, we ask the members that are part of that specific working group in our organization. For the climate area, we have a specific workgroup that provides us with an opinion on the directives, which we give to the board. They then review the position and gives us a mandate on how to act on behalf of the members and what we should work for in the legislation.

How do you and your organization engage in influencing legislative proposal through the European Commission?

There is a before and after process. Concerning Fit for 55, we have known for years that the Commission would make some revised legislation on EU ETS. So, before the Commission proposed a revision, so before they even did the revision, we engaged a process of asking the members what was important within ETS. Then when the Commission proposed a revision, we had a dialogue with the board to get a technical mandate and then we provided feedback to the Commission on what we would like to be implemented in the proposal. Then the Commission makes the proposal, where we go into dialogue with the Commission, the relevant Danish ministries, and the European association

within shipping. We always try to engage in a dialogue that we usually do not cooperate with. For instance, within ETS, we have a dialogue with the airways sector. Then there is the whole process on gaining influence in the Parliament, providing technical knowledge, and make us selves as interesting towards the MEPs. A great part of it is also to create the right alliances with other organizations and companies.

Do you create alliances and cooperation before a legislative proposal is adopted?

Yes, we of course cooperate with our members that we have a continuous dialogue with. But we also make alliances within other sectors such as energy. For instance, in ETS, there is also a lot of talk about Power-to-X. Hence, we talk with providers of energy to go into a dialogue on the availability on energy and how to address this. So, when we do not know what the final proposal is, we build alliances based on interest mapping and a lot of knowledge that can either prove relevant or irrelevant later on.

Do you try to influence the legislation through these alliances and your cooperation with European associations?

Yes, we always cooperate with the European association, European Community Shipowner's Associations (ECSA), who we also coordinated our positions with this time. ECSA is the European counterpart to us for all shipping associations in EU, and they place a position to influence the agenda on our behalf. Sometimes us members do not agree on the position, but ECSA always try to be a united European voice for all shipping. So, we cooperated with them in order to influence the proposal. Because of all the technicalities it is not always possible to have a common position, and then we make alliances with other organizations and interests, or we state that we are not part of ECSA's position on this policy area this time. In climate policies, Danish shipping companies are some of the most sustainable in Europe, so we are part of the group that advocates for the green transition.

Does your position weigh higher within policy areas such as climate and energy, where Denmark is considered to be leading country compared to other policy areas?

A little bit. But that is because we advocate for the same agenda as the Commission and green NGO, so we have easier access and influence on the Commission, because our positions are somewhat the same as theirs. What is most important is how big you are within your group. When we read through the IIA, we always do it with the maritime sector in mind in order to be aware of what the Commission

might miss. It can also concern principles that the Commission has not missed, but rather chosen to leave out due to politics. For instance, ETS only revolves around CO₂, but we have recommended that it is also about greenhouse gas emission, which is more principal and political. When this is the case, we began talking to the Danish ministries that agree with our position and support it. We also contact MEPs to strengthen the green profile, where Denmark has an advantage due to some competencies. The dialogue that we have with MEPs is part of a process in the Parliament where we help getting sustainability on the agenda.

Do you bring proposals for paragraphs and texts to the Commission?

It is difficult knowing what direction the Commission is going to go, so we do not make specific text recommendations. It is more about being aware of a certain issue within the proposal. Sometimes, we also make contact to the Commission to have a dialogue with them on what topics are interesting to consider.

What underlying ideas and process did you have when deciding to provide feedback to the Commission on the energy directives?

Our primary job is to represent our members' interests. Their interests within climate policies concerns regulation, so we always try to stay up front on this area, and then when new regulation happens, we try to influence it for the benefit of our members. We also cooperate with our members on this area, so when we get the IIA, we read them through carefully, get the mandate on how to act through the workgroups and members, and then we submit feedback and our policy position. We decide on what is the most important revision for us by conducting an analysis. ETS concerns shipping directly, and FuelEU has some specific requirements pertaining to our industry. On the other hand, REDII is more implicitly important by setting some requirements for on fuel suppliers and then these requirements impact our industry indirectly. However, all of it is interdependent. REDII is also important for us, but it impacts our sector less hard. However, it still entails a lot of important components such as taxes, fees, etc. REDII concern the supply side, where ETS concerns the demand side.

As you have a lot of members that may have different interests, how do you represent all their interests? What do you do if there is a conflict between your members' interests?

It rarely happens within this agenda. If we feel that there are some inconsistencies between the members, then we try to focus on what they have a common position on, and then that is our position

in the consultation response. For instance, in ETS, we have had a focus on what ships should be included. Here, some of our members want more ships included than what is proposed in the proposal, and some would want less ships included. Then we take it by the board to ask how we should act in this case. For the board, it is also important that we do not try to change everything we ideally want to change, because that is infeasible. So, it is important to prioritize what parts of the regulation that is the most important for us.

How did you promote your interests towards the Commission in order to influence the revision of the directives? What is the advantage of being represented by you instead of lobbying the Commission as a company?

We are political experts. We know the process of political systems and how to best influence the process. It is specific competencies that you generally do not have in the business world. They do not know how the political process works, so we help them navigate in it. If every company had to do it by themselves, it would be a too demanding job. Some of our big members can do it and do also do it sometimes, so it is important to have a dialogue with the members on all the processes, so they know what is happening. Danish Shipping has its own workgroups, webinars, newsletters, and such things for the members to know what is happening and what we are aware of. It is a discipline in itself.

Do you have a specific lobby strategy to obtain influence?

It is especially important to meet and talk to people. When we talk to people, we also need to know what their interests are to find common ground and how it can be interesting for them to cooperate with us or agree with our position. It is all about perspective and understanding where the other interest is coming from and want to accomplish. SO, we talk to a lot of people, we talk to our network, and then we try to connect them all in an alliance. We try to think outside the box when engaging in possible alliances. For instance, we published a discussion paper in cooperation with Green Transition Denmark. We found some common ground we had and then we showed where we wanted to go in cooperation. It makes it interesting for all actors to get in touch with us, because if we can show that we can cooperate with an organization so different from our own, then it must be important we want to say. Usually, we also cooperate with the same organizations for many years in different areas, and these relations of course need to be nurtured and maintained.

Did you have meeting with the Commission? How often? With what DGs?

We did have some meeting throughout the process. Our office in Brussels has the responsibility to figure out who we should talk to, when, and about what. We also use the office to get them to get meetings with some specific parts of the legislature. In October 2021, the Danish office had a several day long trip to Brussels, where the main objective is to talk to and meet a lot of people. Presence in Brussels is so important. When doing this, you turn purposively to specific DG's, in the case of ETS it was DG Climate and DG Move, so it is very target-oriented. What is interesting is that the Commission is a college, so they all work in their own groups, but everyone has a sense of who each other is and what they work with. This means that we can talk to people from different DGs that all keep an eye on a specific proposal in a specific DG, because the proposal may be of importance for them later on. Because they usually do not talk across the DGs, we can use our position and exploit conflicts in different DGs to be the one that suggests how to compromise through our position. This we do by redefining our own role to get our recommendations through. For instance, by offering our knowledge, talking to them how e.g., the UN cooperation politically can be a part of the legislation, and sometimes it is about exploiting the differing views in different DGs.

What was your goal of providing feedback on the directives? How was the premise different than your work with FueleEU and ETS?

The final target is the mandate we get from our board. For instance, on ETS, we had a priority concerning the implementation and enforcement of ETS. In order to enforce ETS, it is a requirement that it is the shipping companies that are legally responsible for enforcing ETS. Some countries argues that it should not be the shipping companies but rather the operators, where we argue that it does not make any sense that it is the operators, because of the risk of evasion as well as there are more than 16,000 operators, so it would be a lot harder to enforce than simply just making the shipping companies enforce it. We had another goal of getting all kinds of greenhouse gas emissions included to be as ambitious as possible but only within the borders of EU, as EU only should make initiatives that regulate the European market, and then IMO will take care of the rest. Concerning REDII, our goal was what is included in our consultation response on including biofuel as a renewable. We do consider the feedback on consultation to also be a powerful voice, as it shows were we as an organization have our level of ambition.

Did you try to intensify your efforts on FuelEU and ETS through your feedback response on REDII?

Yes, because they are really interdependent. All definitions for the fuels of the future are within REDII and not in the other legislation. Not that it is very concise in REDII, but this is where the fuel is defined. Where in FuelEU RFNBO is defined to be used by shipping companies, but not what RFNBO's definition is. So, we get REDII to define it, so we know what we say yes to in FuelEU.

Did you obtain the influence you wanted? Were you positive towards the directives? Were there any elements you wanted to change or were you in general satisfied with the adopted legislative proposals?

We think that REDII looks good overall. It is a good starting point and we are satisfied with the premise, but there are some minor details and technicalities that we would like to change a bit. As we are a part of the transport sector, there are some parts in REDII that we would like clarified on what it specifically will mean for the maritime part of the transport sector.

Did you experience that the Commission listened to your feedback? Is it possible for Danish interests to influence EU legislation or is it difficult because Denmark is a small country?

Yes, we definitely do experience that we are listened to. A lot actually. I have been in the Climate and Energy Ministry some years ago, where I negotiated for the maritime area in climate negotiations. Denmark definitely has a strength in being such a green nation in such negotiations, but as soon as we had to vote, our voice became small and insignificant due to our size. Now, when I have changed to the other side of the table, the relation has changed. This is because Denmark is one of the biggest shipping nations in the world, so as Danish shipping, we all of a sudden have a big voice, even though we come from a small nation. So, it means more that we are large within the sector than being a big country in this instance. When you also take the virtues, values, and decency such as being concise, being prepared for meeting, etc., then people listen to you more.

Appendix M – Andreas Brunsgaard – Senior Adviser for European Affairs, Confederation of Danish Industry

Please present your position and key responsibilities?

I am a senior policy adviser for DI and live in Brussels and work at DI's Brussels office. Those mandates we work on within climate and energy policies are made in DI in Denmark in cooperation with our members, and especially the two departments in DI's industry association for energy, which are DI Energy and DI's political department. This is where the cooperation with the members and our mandate originates from on what our positions are on the Commission's proposals for legislations or revisions. My role here in Brussels is to be the lead on the political interest representation in Brussels, which means to use the mandates we get within the Parliament, the Commission, to make alliances in Brussels with like-minded partners that we can cooperate with, as well as partly having a dialogue with the Danish Permanent Representation. The Danish negotiation mandate is set in the EU committee in the Danish Parliament on what Ministers that negotiate on behalf of Denmark. So, if you want to influence the Danish position, it is typically via the Danish Parliament. My contact with the Danish Permanent Representation in Brussels is rather to find out how the negotiations are going, in tell, etc. and less round trying to influence the general Danish position, which we in DI Brussels is not interested in influencing. Hence, my role is especially influencing the Commission and the Parliament, where I am lead on everything regarding the European Green Deal and Fit for 55. These I spent a lot of time monitoring on how the negotiations are going and bring input where it is possible.

What kind of members does your organization represent and how do you represent their interests in EU?

DI is a really large organization that represents a lot of sectors, where not all of the members can have the same opinions or interests on the same issues. That is why, before I can begin my work and advocate for DI's position here in Brussels, the whole democratic process on hearing our members' opinions on the matter is important and essential, because the different industries we represent may not always have the same interests. Regarding the energy area, we can get a mandate only from DI Energy. But we also have a climate political unit that covers the climate area in broader terms. So, for instance, ETS, that concerns both energy intensive companies, the energy sector, and might be expanded to cover buildings and transport sectors, it is suddenly a legislation that impacts across sectors, which will mean that it is the climate political unit that we need a mandate from as they cover

all our members' interests. Within this unit, there is a climate committee that consists of different representatives from different sectors that all have an impact on the mandate that is then provided to us in Brussels. Conversely, the revision of REDII is very energy specific, so we need to get our mandate from DI Energy alone. Here, there is a whole process of involving our members, writing opinions, how the mandate should manifest itself, which the members in the respective committee discuss and provides the final mandate. This mandate, which is relatively specific, is then the frame that I work within. Then I go to the right legislators and employees to discuss the legislation and trying to influence what should be implemented. In the Parliament, for instance, we are represented with three MEPs being Morten Helveg, Pernille Weiss, and Niels Fuglsang, which is quite a lot actually. But we already bring input to the legislation before the proposal is presented. This is the Danish part of the tools we make use of. But we also have a more internationally oriented set of tools, as Denmark is not that well represented in the EU institutions. Here, we try to gain broader alliances.

Since there are no Danish Commissioners in the relevant DGs on this issue, what is your process then on submitting feedback to the consultation in the Commission? Is it a specific DG?

In REDII, EED and other policy areas within Fit for 55, we would go to DG ENER. However, it can be hard for us to gain access. In Denmark, DI can really good contact with pretty much all the relevant ministries at all levels including the specific Minister. In EU, it is different. Here, DI is a small actor in a much larger political system, so sometimes on some cases if we are really specific, we can set up meetings. These are typically before the Commission presents their final proposal. The EU legislative cycle is five years. The first two years from the Commission is elected and one the following 1.5 years, the preparations for legislation are happening. In this period, there are no negotiations on legislative proposals because they have not been adopted and presented to the Parliament and Council yet. In this period, the Parliament will make own initiative-reports to signal what they would like the Commission to make proposals on. But it is not yet negotiations on legislation. Hence, the first 1.5 years, the most important actor for interest representation is the Commission and try to present good arguments both for and against the presented potential legislation. Sometimes the job revolves around stopping some parts of a proposed revision. Sometimes it is about providing new ideas and recommendations to legislation. This especially concerns legislation within the green area, where we have a lot of progressive companies that want to be ambitious within the green transition, where we on their behalf argue for why the Commission should be even more ambitious in their proposals. We

try to do it, but it can be really difficult to obtain influence. Hence, this is where we make use of our alliances. We work as DI especially during the legislative negotiations with the Danish actors.

But concerning the Commission in the agenda-setting phase, our cooperation with European alliances is crucial, especially our cooperation and membership in BUSINESSEUROPE, the European equivalent to DI, that has memberships from industries all over Europe. It is easier for BUSINESSEUROPE to ask for a meeting with Frans Timmermann or another Commissioner, because BUSINESSEUROPE speaks on behalf of 20 million European companies and a common European industry. Here, we will use a lot of resources to try and influence BUSINESSEUROPE from within, obtain some mandates through them, and the BUSINESSEUROPE has a dialogue with the Commission and try to obtain influence on our behalf with the relevant DG. We are also members of other European associations such as Digital Europe, Food and Drink Europe, and a lot of other sector-specific associations that will then promote our position in these sectors. Hence, our greatest task when trying to influence the Commission is by engaging with the European associations in this really important phase before a proposal is adopted and presented. Now, we instead take part in the negotiations happening in the Council and Parliament on the legislation proposed by the Commission.

Is it possible to influence the positions of BUSINESSEUROPE and Digital Europe and what they promote towards the Commission?

It is difficult to obtain influence within the European Alliances, because we are so many members from different Member States. It depends on the policy areas. Some areas we as members agree really easily if it pertains to issues that all Member States do not think that EU should legislate on, for instance, salaries. Then there are other areas, where we have to work hard to influence it in our direction. Sustainability is actually a good example of this. In BUSINESSEUROPE, we have for many years fought hard to get BUSINESSEUROPE to get a greener position. It has gotten a lot better through the years, but even today, BUSINESSEUROPE's position is not as sustainable and ambitious as what we in DI recommends on our own. But it is important for us to be present in BUSINESSEUROPE, because if we and other Nordic countries as well as France were not present, the BUSINESSEUROPE would never have a sustainable and ambitious position. Hence, we have this green alliance within BUSINESSEUROPE, which is opposed by the Italian, the Greek, the Czechs, etc. that are still very skeptical on the green transition. If we were not there to ensure a balance, BUSINESSEUROPE's position would have been even less sustainable. So, we do not implement all our recommendations

into BUSINESSEUROPE's position, but that is just one of the conditions, when we are so many members. We operate under the mantra that you should not threaten with leaving, you should threaten with staying. Hence, you just have to keep participating in meetings over and over again and insist on changing the position, and we have been successful in moving BUSINESSEUROPE a long way towards the green transition.

Does your position weigh higher within policy areas such as climate and energy, where Denmark is considered to be leading country compared to other policy areas?

It is still really difficult to get the green transition on the agenda. Looking at, for instance, Czechia, 32 percent of their GDP is based on energy intensive companies, which we in Denmark only have very few of that only contributes slightly to our GDP and provides only a few jobs. We as Danes or other Nordics easily get perceived as having too many ideas on how to implement the green transition, because we are not as reliant on energy intensive companies. That is definitely also a factor you have to take into account that Denmark is in a different situation, because our business infrastructure is so different and we already began slowly transitioning since the 1970's. Hence, trying to support our argument on the implementation on the green transition by arguing that it is possible to maintain growth and still make the green transition, decrease our energy consumption, etc., because we have done it in Denmark, it is difficult to get countries on board when their economic situation looks different and that their growth is dependent on fossil fuels. So, it has not been easy for us. It is several hour long meetings within BUSINESSEUROPE, where we sit thirty representatives for different organizations and have to present our arguments for our position, and we already know what their opinions are after knowing the representatives for so many years. But we need to be there and fight, because if we were not, it would have been impossible to get the position to be just a bit more sustainable.

What underlying ideas and process did you have when deciding to provide feedback to the Commission on the energy directives?

We engage in multi-layered lobbyism, where we towards our national actors show that we also provide positions ourselves and not just through our European alliances. We need to show that we cooperate with, for instance, Vestager, Vestager's Cabinet, the Danish MEPs, the Danish government. We never bring BUSINESSEUROPE papers in these cooperation but our own positions with our pure mandate and not the common position of European industries. Regarding EED, we for instance have three strong MEPs that are lead on the case in the Parliament consisting of Niels Fuglsang as

rapporteur for all the ETRA Committee for S&D and Pernille Weiss, who is a shadow-rapporteur for the proposal for EPP, giving us really privileged access to the legislation by cooperating with them and they listen to our recommendations and providing them technical knowledge.

Is that also part of your strategy for gaining access to the Commission by offering a lot of technical knowledge on the area?

Definitely. In the Commission, it does not help at all to be very political and providing a political position. The Commission has the most technical knowledge of all the EU institutions, so, if you want to obtain influence on the Commission, you have to match their level of technical knowledge and bring technical arguments all the way up until the College of Commissioners that do talk about the political point of view. Here, you can use political arguments, but all through the agenda-setting phase and within the civil service up until the College of Commissioners that adopt the final proposal, it is the technical knowledge in your arguments that are important, which is how it should be. In the Parliament, the political arguments are much more important than the technical knowledge and depends a lot on what political group you talk with. But from an interest representation point of view, it is always important to have technical knowledge and being able to support arguments with information.

What was your overall strategy to obtain influence in the Commission?

The most important part of our strategy is general and technical knowledge both in the Parliament and the Commission. We need to understand the legislation, you know the legal terms, you can support your arguments with information, numbers, and data. The second part is to have a legitimate platform. As a company lobbyist or a third party-representation lobbyist, it is more difficult to get in contact with the Commission, because you are just one interest. But if you represent a lot of business interests, a whole sector or the common business market in Denmark as we do in DI and in BUSINESSEUROPE, you have a whole other legitimacy and have a legitimate platform to be part of the decision making process. The last part of our strategy is network. That is why we are present. We have interactions almost on a daily basis with MEPs, Commissioners, the Cabinets and so forth, and they also know who we are and know what we can offer and respects our way of working and our provided knowledge. These three parameters we use to have a successful lobby strategy.

What was your goal of providing feedback on the directives? Did you obtain the influence you wanted on the final legislative proposals on REDII and EED? Were you positive towards the directives?

Overall, we were satisfied with the Commission's proposals on REDII and EED. Now negotiations in the Parliament and Council are happening, so we do not know yet what the final legislation will look like, but it is a useful starting point. For instance, Denmark is very ambitious on energy efficiency, as we are really good at energy efficiency. Hence, we would like an even more ambitious target on energy efficiency by 2030 than what the Commission has proposed as well as we have some recommendations on how to obtain this target. I know some Danish companies such as Danfoss and ROCKWOOL have also recommended ambitious targets, because it benefits their businesses if, for instance, the target for energy efficiency is increased, as the demand will increase on their products. So, they have ambitious targets in line with our recommendations.

Are there elements in the proposals that you recommended implemented?

Specifically, there is one element that we have been especially aware of, which we have had a dialogue with the Commission on is article 4. If we in Denmark start to make Power-to-X electricity in Denmark, which is our ambition to do by making green hydrogen and make it a new export market, it may mean that we will have a higher energy consumption. This is because you make use of electrolysis through renewable energy to make green hydrogen. It will make it more difficult for Denmark to obtain the energy reduction targets that there are in EED. That is why there in article 4 is a flexibility mechanism that enables a higher energy consumption if it is to produce renewable energy and the energy is based on renewable energy. We do want to be really ambitious on the energy efficiency agenda, but it should not hinder the production of new green energy sources.