

# NGOs in the European Union.

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# NGOs in the European Union: between institutionalisation and participation<sup>1</sup>

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Non-Governmental Organisations (NGOs) in the European Union (EU) are widely understood as non-producer actors. A landmark paper from the European Commission (responsible for initiating EU legislation) in 2000, *The Commission and NGOs: building a stronger partnership*, issued in the names of the President and Vice-President, grappled with definitional issues over the course of two pages, finally settling on

NGOs are not self-serving in aims and related values. Their aim is to act in the public arena at large, on concerns and issues related to the well-being of people, specific groups of people or society as a whole. They are not pursuing the commercial or professional interests of their members (European Commission, 2000, p.4)

Notwithstanding a failure to recognise that NGOs can be factional, the key point from the quotation involves the delineation of NGOs from organisations pursuing commercial or professional interests. A number of producer organisations at EU level sought in the past to claim the trophy standing of 'NGO' by asserting their legal status, electing for the 'NGO' category on the EU's Transparency Register<sup>2</sup>, an

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<sup>2</sup> <http://ec.europa.eu/transparencyregister/public/homePage.do>

incentivised public information register about lobby organisations and their activities which over 11,000 (including around 3,000 in the NGO category) have elected to join. The claim of NGO status by producer organisations was particularly acute when the Register previously carried the incentive that the NGO category were excused from declaring lobbying spending (Greenwood and Dreger, 2013). The Transparency Register offers the advice that ‘the decisive factor should be what you do, not your legal status’ (European Commission, 2017a, p.6).

This chapter follows the above definition from *the European Commission and NGOs* in its selection of coverage. The definition allows for the inclusion of consumer protection groups, even though *stricto sensu* the focus of their work would place these groups as interests working in the producer domain. There is a mature community of NGOs fitting the European Commission definition established and/or working at EU level. These can be divided into five categories. The first, and most typical, are mostly confederations, i.e. associations of associations (mainly national, but also including in membership regional or other European associations). Commission policy documents in the 1990s stated a preference for confederations over other types of interest organisations (European Commission, 1992; European Commission, 1997), and laboured long over the representativeness of such organisations in the hope of some kind of streamlined corporatist style dialogue. The European Commission is a large and diverse organisation, and there remain pockets of quasi-corporatist practice involving individual Commission departments, and lead NGOs. A second category involves a smaller number of EU NGOs which have made a niche from not being confederated, such as the *European Citizens’ Action Service* (ECAS) and the *Permanent Forum of Civil Society*, each of which stress the

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importance of EU institutions having mechanisms which link them directly with citizens, although these NGOs themselves carry only token membership from individual citizens. A third category, also with offices in Brussels, are international NGOs with policy offices, which include Amnesty International, Friends of the Earth, Greenpeace, Transparency International, and the Worldwide Fund for Nature (WWF). These all have some degree of institutionalised relationships with the main EU decision making bodies, but a more recent trend has been the establishment in Brussels of a fourth category, a small number of fiercely independent professionalised social movement organisations with an anti-globalisation outlook. These latter organisations start with the outlook that the EU concept is part of the liberal tradition of globalisation they shun, and are more likely to ‘shout abuse through the letter box’ (Jordan and Halpin, 2003) of EU institutions than to act as a critical friend. Nonetheless, there are some signs that even such organisations have become drawn into the ‘Brussels bubble’ through detailed legislative advocacy work, rather than early day tactics of occupying offices of business associations. The fifth category, described later, involves NGOs established at national level and working in EU policy issues, almost entirely based in the EU member states, although often working on EU issues more in a policy implementation than policy advocacy role.

A population of NGOs working at EU level mainly comprised of confederations, and policy branch offices of international NGOs, means that there is a limit to the extent to which dialogue between political institutions and NGOs radiates out to civil society more widely comprised. Rather, the priority for NGOs is advocacy, articulated by the lead environmental NGO at EU level in conversation with a researcher:

While ideally it would be good to get people involved, time pressures mean that the most effective use of my time is to get on with advocacy.

In the end my role is not to encourage the most participatory governance, but to ensure the best results for the environment'

(Sudbery, 2003:90)

The result is an ecosystem known as the 'Brussels bubble' based around an intensive policy orientated dialogue between political institutions and organisations with a Brussels office. Despite the aspiration of EU political institutions that their dialogue with NGOs would help with participative (input) legitimacy and have some effect in radiating out to civil society (European Commission, 1997), the dialogue mainly helps with output legitimacy (to do with the technical quality of public policies), and with political support, described below. The 1993 policy document issued by the European Commission, '*An open and structured dialogue between the Commission and special interest groups*' (European Commission, 1993) marked the start of attempts to put informal policy exchanges on a more formalised and transparent basis.

### **The EU ecosystem for NGOs**

The commentator quoted above was from the *European Environmental Bureau* (EEB), established in 1974 at the initiative of the European Commission in search of an organisation capable of providing it with both expert technical information and political support for its expansionist ambitions in European integration.

Environmental policy is one of the most popular competencies for the EU to hold, because it passes the added value test of acting at the transnational level; pollution is no respecter of national boundaries. Consequently, the European Commission chose to be an activist in the field at an early stage, in search of further European integration

by building on fertile territory. It hoped that national members of the EEB would lobby EU member states to support the Commission's ambitious environmental policy positions in the co-legislative (with the European Parliament) Council of Ministers, countering some of the more conservative lobbying by producer organisations against environmental protection measures. The international environmental protection NGOs joined the fray in the 1980s, establishing policy offices focused on advocacy with EU institutions, and capable of bringing its network into EU policy work with national governments. These organisations bring substantial resources into EU advocacy; WWF currently has 43 staff working from its Brussels office (WWF, 2017). There are ten lead environmental organisations in the loosely co-ordinated 'Group of 10' network, which met every month to co-ordinate their activities, and who between them have over 130 staff.

Whilst environmental NGOs are the strongest segment of EU representation, a similar pattern on a smaller scale can be found in other 'sectors' of NGO representation. In Social Policy, for instance, the European Commission stimulated the formation of the *Platform of European Social NGOs* ('Social Platform') at the head of a 'family' of other NGOs working in the social policy field. There are other families of NGOs working in the field of human rights, culture, lifelong learning, and development, of which the latter, *CONCORD*, is the most established (dating from the 1970s) and co-ordinated. The corresponding service of the European Commission meets regularly with the counterpart family head. In the field of social policy and development there are more institutionalised links which include development NGOs undertaking a substantial role in EU policy implementation. Among the NGOs there is a 'family of families' of NGOs, *Civil Society Europe*, which seeks an institutionalised 'Civil Dialogue' with EU institutions, aspiring to a more formal

status to the relatively informal exchanges which take place between NGOs and civil society. Civil Society Europe is based around its network of 31 network organisations, including the Green 10, Concord and the Social Platform. The Social Platform has historically been the lead family in pursuit of a formal civil dialogue status, inspired by the EU ‘social dialogue’ between employer organisations and trade unions and which has a much greater formal status and powers (Greenwood, 2017). Article 11(3) of the Treaty on European Union mandates EU institutions to ‘maintain an open, transparent and regular dialogue with their representative associations and civil society,’ but stops short of specifying what the effect and status of that dialogue should be.

Measures to promote transparency have been a common, and incrementally developing, element to underpin all of the exchanges between political institutions and outside interests. There are registers of expert and advisory groups, on which advocacy groups sit alongside national government officials and other experts, with each group making its minutes, and declarations of interests, available online. Commissioners, and their staff, make declarations of meetings with advocacy organisations on their web sites. There is a vigorous and contentious freedom of information (in EU speak, ‘Access to Documents’) regime governing EU institutions, allowing NGOs (and others) to address any asymmetries of information, and which has given rise to a specialist NGO dedicated to expanding the regime and to encouraging public use of the instrument through its custom website *Ask the EU.org*. The Transparency Register contains declarations by interest organisations which cover the main EU initiatives followed by the organisation, participation in EU structures and platforms, membership, staffing, and lobbying spending

The NGO Category of the Transparency Register is its fastest growing segment (European Commission, 2017b). The register has been significantly cleaned up as a public information tool since the days when a perverse incentive populated the category with producer organisations. The register as a whole now carries significant incentives for organisations to join it, to the extent that it can be considered as inclusive of the main organisations which lobby EU institutions (Bunea, 2017). Whilst there remains some ‘noise’ on the register of organisations motivated more by the opportunity for free publicity than by working links to EU public policy, the register contains some useful data. There are 3,000 organisations in the NGO category of the register, accounting for over a quarter of all entrants. 261 of these have an office in Brussels, with the remainder based primarily in Europe. An indicator of active lobby organisations are those with accreditation to hold day passes to the European Parliament, of which there are 635. Holding a pass makes it possible to enter the campus of the European Parliament building for a day, with access to most areas, whereas the alternative requires a specific appointment with someone in the EP for the designated time period. A day pass thus carries a significant incentive for advocacy organisations, for whom ad-hoc contact with MEPs, their assistants, political advisors, and EP personnel, adds value to their work. NGOs with pass holders hold an average of 2.8 passes each, providing some indication of the extent to which NGOs devote resources to work with the European Parliament.

The European Parliament has generally been held to be the friend of ‘diffuse interests’ (Pollack, 1997; Duer and Mateo, 2014), particularly where issues become highly salient when the EP needs to parade its credentials as the people’s tribune. This is of central importance to the EP, as fewer than half of EU citizens show up to vote in EP elections. Sub Committees in the EP have proved a fruitful means of

agenda-setting for NGOs (Greer, 2009), from which the EP calls on the European Commission to bring forward legislative and policy initiatives. There are however also assessments claiming that the European Parliament has been tamed by its growth in legislative powers into being a ‘responsible legislator’ (Burns and Carter, 2010; Burns et al, 2013). There are also assessments in between these two positions, highlighting again the importance of salience in determining whether the EP takes up a pro-business (low salience) or pro-NGO (high salience) position (Rasmussen, 2014). More generally, the importance of salience has become established in the literature about the impact of organised interests on EU policy making (Klüver, Braun & Beyers, 2015). NGOs have skilfully deployed framing strategies in order to push them into the category of high salience (Börang and Naurin, 2015)

Many of the NGOs established at EU level arose from efforts to stimulate their formation initiated by the European Commission, often during a theme ‘European Year of..’. The *European Network Against Racism* (ENAR), and the *European Federation of National Organisations Working with the Homeless* (FEANTSA) are examples of organisations established in this way. Core funding, as well as task specific funding, is provided by the European Commission; for those NGOs which get an EU grant it accounts for an average of 43% of their funding (Greenwood and Dreger, 2013). Where an organised advocate is not present and needed, so the EU institutions will act to establish one. Thus, *Finance Watch* emerged as a consumer voice in finance, initially stimulated by Green Members of the European Parliament (MEPs) and then institutionalised with longer term funding by the European Commission.

The international NGOs differ in the extent to which they will accept EU funding. Whilst Amnesty International and Greenpeace refuse EU funding on the grounds that

it may create the perception of influence, Friends of the Earth Europe (FoEE) and Transparency International receive a significant level of funding. Much of this is project orientated, and thus subject to substantial variation. For instance, according to the European Commission funding public database ('Financial Transparency System'), in 2014 FoEE received €6,113,088 whilst the following year it received substantially less, €13,720. Nonetheless the resources provided by EU institutions help to sustain an NGO population which is sufficiently resourced to be able to engage EU institutions at a level of detail. Beyond the environmental sector is the European Consumers Confederation (BEUC), with 44 staff, and the European Youth Forum (EYF) with 25 staff. A number of NGOs have a sufficient level of resourcing to be clustered close to the European Parliament building, which is also the most expensive property hotspot in Brussels (Palmieri, 2015), often by working in 'NGO houses' owned or leased by ethical funding investments. These involve the sharing of back-office facilities, but with canteens also, providing an ideal facility for networking and purposeful coalition formation, and with the atmosphere of a 'well run students union' (Ariès & Panichi, 2015). The *modus operandi* of NGOs at EU level is to pool resources by working in coalitions, within the NGO community itself, and with trade union organisations seeking to defend public services. These venues also provide a significant meeting point between institutionalised NGOs and professionalised social movement organisations, with organisations such as Friends of the Earth performing important bridging roles between the 'two worlds of collective action' (Hadden, 2015).

To outside eyes, this extent of funding and institutionalisation of NGOs may amount to their instrumentalisation. However, any cursory glance at the website of Friends of the Earth Europe suggests otherwise, with campaigns in evidence which

are critical of EU institutions, including the European Commission. Such NGOs understand that their role is to be an unofficial opposition in a political system which lacks one, a political system in which decision making is based around a search for consensus between three EU institutions. Nonetheless, funding may bring a psychological restraint in the mind of the recipient. For instance, the *European Women's Lobby* (EWL), which receives over three-quarters of its income by way of a grant from the European Commission, has taken a policy decision not to use litigation against the Commission as a means of seeking its goals (Sanchez Salgado, 2014). It also screens potential members for conformity with its goals (Johansson and Lee, 2014). The reward for its pursuit of an 'insider strategy' is a quasi-monopoly on representation (Jacquot and Vitale, 2014). Because of the perception that funding from political institutions might bring constraints, advocacy organisations have in recent years accessed a significant number of alternative funding sources (occasionally, bizarre – see Politico, 2017), such as trust funds and regular NGO funders like the *Open Society Foundation*.

NGOs established at EU level are mostly 'system insiders' by virtue of their incorporation in a labyrinth of Expert Groups and Consultative Committees (European Commission) and 'Intergroups' (European Parliament). The 766 Commission groups are primarily populated by national government experts, but civil society organisations provide for the next biggest category of members, with NGOs accounting for around one-quarter of all members (Gornitzka and Sverdrup, 2010). Apart from members from public authorities, members are selected through public calls for applications. These groups provide the Commission with non-binding 'specialist advice from outside experts as a basis for sound policymaking' and 'advise the Commission in relation to the preparation of legislative proposals and policy

initiatives'.<sup>3</sup> Their advice is but one form of input, alongside studies, advice from European agencies, public consultations, and hearings. In the case of the European Parliament, Intergroups are informal, cross-party forums for discussion between MEPs, and selected others, and whilst they have no role in policy-making they can be places to build consensus. The European Parliament Rules of Procedure for intergroups<sup>4</sup> records that 'members may form intergroups for the purpose...of promoting contact between members and civil society'. In practice this means a corresponding advocacy group formed at EU level. NGOs can provide secretariat services for intergroups to run, and do so in the case of intergroups on: Animal Welfare; Climate Change; Disability; Extreme Poverty. There are other intergroups which are such a close match (Ageing; Children's Rights; LGBT; Youth issues) to the interests of the NGO that the latter has appointed a corresponding EP liaison post. Beyond the registered intergroups are (even) less formal 'interest groups', which have no institutional existence but act as de facto intergroups, because EP rules restrict registered intergroups to those with the support of a defined number of members.

Beyond Expert and Advisory groups are the bilateral exchanges between EU institutions and outside interests. These have increasingly been the subject of regulation, through the Transparency Register, transparency declarations by Commissioners and their cabinets, and consultation regimes. Consultation exercises feed into impact assessments, which are mandatory for all EU legislative initiatives, and published alongside legislative proposals. The consultation strategy has to be announced at the outset of the Commission's intention to legislate. Consultation

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<sup>3</sup> <http://ec.europa.eu/transparency/regexpert/index.cfm?do=faq.faq&aide=2>

<sup>4</sup> Title 1, Chapter 4, Rule 34  
<http://www.europarl.europa.eu/sides/getLastRules.do?language=EN&reference=RULE-034>

exercises have a public element involving a 12 week internet consultation, with (patchy implementation of) the responses published on the consultation website. The Commission is supposed to publish a round-up of the consultation responses followed by its own reasoned policy choices, but again implementation of this remains patchy (Hüller, 2010; Kohler Koch and Quittkat, 2013).

The making of EU legislation involves inter-institutional negotiation, mostly conducted in ‘trilogues’ (three-way dialogues) between the European Parliament, Council of Ministers, and Commission, before the first two of these pass a legislative act. Trilogues have become an instrument to reconcile different positions, such that the overwhelming majority of EU legislation is now agreed at first reading between the European Parliament and Council of Ministers. Trilogues provide institutions with ‘the space to negotiate’ by happening in secluded settings, involving a legislative team from the European Parliament and the rotating Presidency of the EU, representing the Council of Ministers. The institutions like them because they offer a speedier way to resolve conflicts, place the negotiators in a direct bargaining position, and obscure the deal-making undertaken in order to arrive at an agreement on a legislative file. These factors also make them problematic from a democratic legitimacy perspective, a ‘black-box’ of decision-making, where information becomes privileged to those with the contacts to obtain it. Moderately sized civil society organisations based in Brussels seem to be able to obtain this information, often in return for providing value-added expert analysis, such that the outcome of trilogues provide few surprises. Beyond this, civil society organisations often act as a point of information transfer between the institutions, and sometimes even as political emissaries when one institution is trying to influence the other to adopt a particular position. A recognised alliance is between the European Parliament, as the People’s

Tribune, and NGOs, seeking to politicise issues in order to gain concessions from the Council of Ministers. One NGO reported during interview that ‘it happens all the time that we are political emissaries of the EP with the Council. I was almost negotiating for the negotiator in one case.’<sup>5</sup> In this way, civil society organisations, including moderately sized NGOs, can play an informal yet institutionalised dimension of EU policy making.

Two other EU organisations in the ecosystem of EU NGOs worth a mention include the European Ombudsman, and the European Economic and Social Committee (EESC). The Ombudsman has generally made common cause with NGOs in seeking to enforce and extend the reach of their office, particularly on freedom of information related issues. The Economic and Social Committee brands itself as the ‘house of civil society’, but this needs to be qualified in certain ways. The EESC was established at the founding of the European Economic Community in 1957, reflecting corporatist practices of a number of founding EU member states in an institutionalised dialogue between producer interests. Members of the EESC are nominated by national governments as individuals (rather than delegates of any organisation), and usually serve on one of three groups inside the EESC: employer interests; trade union interests; and other (diversely constituted, from SMEs to professions to traditional advocacy NGOs) interests. Typically, members are retired from a career with one of the types of interests represented by the three groups. The EESC is an advisory body only, but its niche is that it brings links to national civil society through the members appointed. There is a liaison group established by the EESC to link with EU civil society organisations, but some EU NGOs remain ambiguous about the EESC. On the one hand, it hosts many events, and publishes many reports, which are in the same

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<sup>5</sup> Interview with an environmental NGO, Brussels, 29.9.2017

direction of travel as many EU NGOs, particularly about the role of organised civil society in the EU. On the other, EU NGOs are wary about being ‘parked’ at an advisory body, fearing it could institutionalise their marginalisation from other, more mainstream, EU policy making structures.

National civil society organisations are generally engaged at EU level by virtue of their membership of a corresponding EU association, but a number of national NGOs have their own programme of EU orientated activities, with the most active cross-sectoral voluntary organisations co-ordinating their interests through a European Network of National Associations (ENNA). Many national civil society organisations have undertaken a role in the implementation of EU policy making through project work (Johansson, 2007), particularly in social inclusion related projects through the EU’s ‘Open Method of Coordination’ experiment. The latter involved a new mode of ‘soft’ EU policy making, seeking policy implementation through non-legislative means, involving national civil society organisations in delivery and overseen by EU NGOs such as the *European Anti-Poverty Network* (EAPN). The incorporation of EAPN into EU policy implementation is one aspect of its institutionalisation, but there is also a ‘revolving door’ of personnel between EAPN and the department of the European Commission which deals with Employment and Social Affairs (DG EMPL) (Sanchez Salgado, 2014).

A major change agent in the EU ecosystem involves the introduction by the 2009 Lisbon Treaty of the European Citizens’ Initiative (ECI), a mechanism which enables an initiative collecting the signatures of 1 million European citizens within a 12 month period to ask the European Commission to bring forward a legislative proposal on a topic which falls within the competencies of the EU Treaties. Whilst the measure has no powers of mandation, and only 4 (official) initiatives to date have met

the 1 million signature threshold, its direct nature represents a significant departure from hoping for democratic effects to be delivered by established practices of dialogue between EU institutions and NGO confederations. The organisation which has led the pursuit of a ‘civil dialogue’ status between representative organisations and EU institutions, the Social Platform, initially gave a cool reception to the introduction of the ECI, asking the European Commission to focus instead on a renewed drive for the dialogue (Greenwood, 2015). After all, initiatives which have emerged in the territory claimed by NGOs, but not organised by them, are challenging to their legitimacy; one example involves the proposed ECI to ‘End Legalised Prostitution in Europe’ came entirely separately from the European Women’s Lobby (Bouza Garcia and Greenwood, 2014). The crowd which has mobilised behind, and used, the ECI are generally different from the ‘Brussels bubble,’ although over time the institutionalised EU NGOs have joined the fray more, particularly as trade unions organised at EU level, and social movements, have used the mechanism. Thus, the Social Platform is listed as a supporter to the trade union organised ECI against water privatisation, and the head of the G10 family of environmental NGOs, the EEB, joined the unofficial STOP TTIP! ‘self-organised ECI’ campaign as a partner organisation.

In sum, the EU ecosystem can be described as an organised type of pluralism in which NGOs flourish. EU institutions have strived for a population ecology of advocacy organisations in which every voice is heard, balanced between producer and non-producer interests. The dialogue between EU institutions and outside interests has become progressively institutionalised, underpinned by a common denominator of transparency measures. There are expert/advisory groups which assist the European Commission in its task of preparation of legislation, where producer and non-producer

interests join with officials from national governments, and individual experts. Beyond these are bilateral exchanges between political institutions and outside interests, which have become progressively formalised since 1993. There have been some corporatist inspired attempts within the European Commission to organise its dialogue (see Kendall and Fraise, 2009; Obradovic, 2005), but the last of these came in the European Commission's deliberations over its 2001 White Paper on Governance. Nonetheless, there remain relationships between individual departments of the European Commission and NGOs which have a quasi-corporatist quality to them, most notably in the fields of environmental protection, and social affairs. The 2001 White Paper on Governance marked a major drive for the EU to connect with wider civil society, and shortly thereafter gave rise to a series of 'soft law' rules for dialogue between EU institutions and 'interested parties', such as consultation and transparency related procedures. These measures placed obligations upon EU institutions and civil society organisations, such as the length of consultation, a database of expert advisors, and incentivisation for lobby organisations to join a public disclosure database. Civil society organisations have also become institutionalised into progressively formalised informal policy-making mechanisms, acting as information flows during trilogue negotiations. The relationship between EU institutions and organised interests as a whole has been described as a form of 'elite pluralism'. This label captures aspects of the relationship, but it is more diverse than this, ranging from simple instruments of transparency, through to quasi corporatist practices. These structures and relationships make the EU level a thriving venue for, and of, NGOs.

## References

- Ariés P and Panichi J (2015) Inside the EU's Palace of Protest, <http://www.politico.eu/article/europes-activism-lobbyists-institutions-ngos-civil-society/> accessed on 26 June 2018.
- Boräng, F and Naurin, D (2015) 'Try to see it my way!' Frame congruence between lobbyists and European Commission officials, *Journal of European Public Policy*, 22, 4: 499-515.
- Bouza Garcia, L. and Greenwood, J. (2014) 'The European Citizens' Initiative: a new sphere of EU politics?' *Interest Groups & Advocacy*, 3, 246-267.
- Bunea, A (2017) 'Legitimacy through targeted transparency? Regulatory effectiveness and sustainability of lobbying regulation in the European Union, *European Journal of Political Research*', DOI 10.1111/1475-6765.12231
- Burns, C. and Carter, N. (2010) 'Is Co-decision Good for the Environment? An analysis of the European Parliament's Green Credentials', *Political Studies*, 58: 123-143.
- Burns C., Carter N., Davies G. and Worsfold N., (2013) 'Still saving the earth? The European Parliament's environmental record', *Environmental Politics*, 22(6): 935-954.
- Coen, D and Richardson, J (2009) (eds.) 'Introduction', in D Coen and J Richardson (eds.) *Lobbying the European Union: Institutions, Actors and Issues* (Oxford: Oxford University Press).
- Dür, A. and Mateo, G. (2014) 'Public Opinion and Interest Group Influence', *Journal of European Public Policy*, 21(8): 1199-1217.

European Commission (1993) 'An open and structured dialogue between the Commission and special interest groups', Official Journal of the European Communities, C63/02, 36, 5 March <http://eur-lex.europa.eu/legal-content/LV/TXT/?uri=OJ:C:1993:063:TOC> accessed on 26 June 2018

European Commission (1997) 'Promoting the role of voluntary organisations & foundations in Europe', COM 97(241 final). 06.06.1997  
<http://aei.pitt.edu/6976/1/6976.pdf> accessed on 26 June 2018

European Commission (2000) 'The Commission and Non-Governmental Organisations: Building a Stronger Partnership', <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52000DC0011> accessed on 26 June 2018

European Commission (2017a) Transparency Register: implementing guidelines,  
[http://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do;TRPUBLICID-prod=vNQJu7ouueVRtSWoDx\\_sdIu0mBUGt4mpkrX8BDUK4v6xcFfhGlfl!-863471633?locale=en&reference=GUIDELINES](http://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do;TRPUBLICID-prod=vNQJu7ouueVRtSWoDx_sdIu0mBUGt4mpkrX8BDUK4v6xcFfhGlfl!-863471633?locale=en&reference=GUIDELINES) accessed on 26 June 2018

European Commission (2017b) Annual Report on the Operations of the Transparency Register 2016  
<http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en> accessed on 26 June 2018

Gornitzka, A and Sverdrup, U (2010) Access of Experts: Information and EU Decision-making, *West European Politics*, 34:1, 48-70.

Greenwood, J (2017) *Interest Representation in the European Union* (Basingstoke: Palgrave Macmillan).

Greenwood, J (2015) 'Civil Dialogue And The Citizens' Initiative: Accounting For Collaboration And Competition Using The Advocacy Coalition Framework And The Strategic Action Field', in Håkan Johansson and Sarah Kalm (eds.) *EU Civil Society: Patterns of Cooperation, Competition and Conflict*. Basingstoke, Palgrave Macmillan, chapter 11.

Greenwood, J and Dreger, J (2013) 'The Transparency Register: a vanguard of strong European lobby regulation?' *Interest Groups and Advocacy*, 2, 2, 139-162.

Greer, S. (2009) *The Politics of EU Health Policies*. Buckingham: Open University Press.

Hadden, J (2015) *Networks in Contention: the Divisive Politics of Climate Change* (New York: Cambridge University Press).

Hüller, T (2010a) 'Playground or democratization? New participatory procedures at the European Commission', *Swiss Political Science Review*, 16(1), 77-107

Jacquot, S and Vitale, T (2014) 'Law as weapon of the weak? A comparative analysis of legal mobilization by Roma and women's groups at the European level', *Journal of European Public Policy*, 21, 4: 587-604.

Johansson, H (2007) 'Europeanisation from Below: the OMC process on social exclusion in the Swedish Welfare State', in H Johansson and B Hvinden (eds.) *Citizenship in Nordic welfare states: Dynamics of choice, duties and participation in a changing Europe* (London, Routledge), pp125-139

Johansson H & Lee J (2014) 'Bridging the Gap: how do EU based civil society organisations acquire their internal representation', *Voluntas*, 25: 405-424.

Jordan, G and Halpin, D (2003) 'Cultivating small business influence in the UK: the federation of small businesses' journey from outsider to insider', *Journal of Public Affairs*, 3, 4, 313-325

Kendall, J. and Fraisse, L. (2009) The European Statute of Association: why still an obscure but contested symbol in a sea of indifference and scepticism? in: Kendall, J. ed. *Handbook on Third Sector Policy in Europe: Multi-level Processes and Organized Civil Society*. Cheltenham: Elgar.

Klüver H, Braun C & Beyers J (2015) 'Legislative Lobbying in Context: towards a conceptual framework of interest group lobbying in the European Union', *Journal of European Public Policy*, 22, 4:447-461.

Kohler Koch, B and Quittkat, C (2013) *Demystification of Participatory Democracy* (Oxford: Oxford U P)

Obradovic, D. (2005). Good governance conditions for the participation of business associations in EU consultations - the statute for a European association and beyond: still in search of Yugoslav corporatism at EU level. *Transnational Associations*, (4), 231-235

Palmeri, T. (2015) The Brussels Gucci gulch, *Politico*, <http://www.politico.eu/article/brussels-real-estate-lobbying-parliament/> 20 May 2015, accessed on 26 June 2018

Politico (2017) *Mystic money man behind Brussels activists*, *Politico*, 6.4.2017, <http://www.politico.eu/article/ayman-jallad-ayman-jallad-mystic-money-man-behind-brussels-activists-ngo-funding/> accessed on 26 June 2018

Pollack, M. (1997) 'Representing diffuse interests in EC policymaking', *Journal of European Public Policy*, 4(4): 572-590.

Rasmussen, M (2014) 'The Battle for Influence: The Politics of Business Lobbying in the European Parliament', *Journal of Common Market Studies*, 53, 2, 365-382.

Sanchez Salgado, R (2014) *Europeanizing Civil Society: how the EU shapes civil society organizations* (Basingstoke: Palgrave Macmillan).

Sudbery, I. (2003) 'Bridging the Legitimacy Gap in the EU: Can Civil Society Help to Bring the Union Closer to Its Citizens', *Collegium*: 26, Spring: 75-95.

Worldwide Fund for Nature (WWF) (2017) Annual Review 2016  
[http://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf\\_annual\\_review\\_2016\\_lr.pdf](http://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf_annual_review_2016_lr.pdf)  
accessed on 26 June 2018