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I'll need a volunteer:
The role of ENGOs in integrating
environmental concerns in the
European biofuel policy through
the European Parliament.

Thijs Vandenbussche



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Abstract

The transport sector remains an important frontier for the horizontal integration of environmental concerns in energy policy due to its greenhouse gas intensity and high energy consumption, with little technological alternatives to the internal combustion engine. The obstacles and opportunities for this horizontal integration, however, have received little scholarly attention from the field of political science. This paper aims to contribute through a case study of the problem of indirect land use change (ILUC), which curbed the initial enthusiasm of policy makers about the possibilities of biofuels to reduce transport emissions. We examine why and how the problem of ILUC entered the European agenda through a detailed document analysis complemented with a number of interviews, contending that environmental NGOs used their beneficial access to the European Parliament to put ILUC on the European agenda. We use the methodology of process tracing to establish the causal relation between these stakeholders' strategies and the behaviour of the European Parliament. The results of this research show that ENGOS indeed played an important role in convincing the European Parliament to make an amendment on ILUC, but we suggest that coalition resources constituted another – so far hidden – driver. Finally, we sketch out some repercussions of the ILUC-dossier for the agenda setting power of the European Parliament.

One of the important challenges of the European Union's environmental and climate policies has been the integration of these concerns into other policy domains. The transport sector has been a thorn in the side of environmental goals due to its energy and carbon intensity. Decarbonizing transport has proved particularly challenging, as few alternative technologies are available to replace the dominant technology of internal combustion engines. EU policy makers, therefore, perceived biofuels as a perfect solution: they were good for farmers, the car manufacturing and oil industries, and they would theoretically reduce lifecycle emissions to zero. However, since the end of 2006, the biofuel policy has become more and more controversial. The initial enthusiasm about biofuels rapidly began to dissipate, mainly because of two problems caused by increased biofuel production: the food vs. fuel problem, and the problem of indirect land use change. Around the same time, the Commission had proposed to review the Renewable Energy and Fuel Quality Directives (RED & FQD) that formed the core of the EU's biofuel policy.

Even though the problem of food vs. fuel had an important impact on the perceptions of biofuels, in this paper we will focus on the problem indirect land use change (ILUC) –which states that lifecycle emissions of biofuels could be a lot higher than expected - because of its direct relevance for the horizontal integration of climate objectives into transport policy. Even though the effect is complex and thus hard to measure, decision makers now had to take into account that biofuels might not make a positive contribution to limiting climate change after all. The evidence of ILUC slowly trickled through the institutions, facilitated by the actions of Environmental Non-Governmental Organisations (ENGO). Eventually the ILUC file became much discussed in the public sphere.

The main objective of this paper is to make a contribution to the literature by studying the obstacles and opportunities to the horizontal integration of environmental concerns in the

European transport and energy policy given that “little attention has been given to organizational and/or institutional aspects of policy integration and how this relates to theories from organizational, policy or political sciences”.¹ The ILUC-dossier makes for an excellent case study, as it was a debate about integrating the European environmental policy into the transport (and connected with this: energy) policy.

The research question of this paper is: “Why and how did ILUC enter the European policy making agenda?” As ILUC entered the European policy making agenda during the decision-making on the Renewable Energy and Fuel Quality Directives, the period between 2007 and 2009 will be the timeframe of this paper.

As this research aims to contribute to our knowledge about the institutional barriers and opportunities in the agenda setting for ILUC, we will focus on the role of the European Parliament, as it was the only institution that was in favour of putting ILUC on the agenda. Because the ENGOs were very vocal in the document and had good access to this institution, we will specifically research their role in convincing the Parliament to put ILUC on the agenda. Our hypothesis is therefore that ILUC first entered the European agenda because ENGOs put pressure on the decision-making process by successfully lobbying the Parliament.

Special thanks to the editorial team, Prof. Dr. Olivier Costa, Umur Akansel, my close friends and fellow alumni of the Chopin Promotion, my parents and sister, and Montague.

¹ H. Geerlings, and D. Stead, ‘The integration of land use planning, transport and environment in European policy and research.’, *Transport policy*, vol. 10, no. 3, 2003, p. 194.

1. Integrating the European energy, transport, and environmental policies: the EU biofuels policy for transport and the problem of indirect land use change

European environmental policy was initially perceived as one that could stand on its own, without being taken into account in other policy areas.² However, throughout the years, this perception changed through multiple events in favour of a horizontal integration³ of environmental concerns in other policies. Because of the importance of transport for greenhouse gas emissions (20% of total emissions in the EU and rising) and energy use (32% of the EU's total energy consumption), achieving environmental policy integration in this sector was seen as crucial.⁴

Even though transport clearly is a crucial sector to integrate energy and environmental policies, it is also one where fuel economy is hardest to realize and good alternatives to fossil fuels are lacking. Even though electric car brands such as Tesla may have cleared the path for electric vehicles, it remains impossible to envisage road transport without combustion motors. Integrating the environmental policies into the transport – and in that way, energy – policies thus became a crucial challenge to policy makers after the development of a common environmental policy since the 1970s, and a common climate policy since the 1980s.⁵ The independent development of these policies and their horizontal integration later on explains the interest of policy makers in biofuels to make transport more sustainable,⁶ even though there were some minor doubts about some aspects of sustainability of biofuels in the Parliament and DG Environment.⁷ If mixed with conventional fuels, they can be used in

² J.Hertin, and F. Berkhout, 'Analysing institutional strategies for environmental policy integration: the case of EU enterprise policy', *Journal of Environmental Policy & Planning*, vol. 5, no. 1, 2003, pp. 39-56.

³ With horizontal integration, we mean the integration of one policy area (e.g. environment) in another (e.g. transport). This concept related to the concept of vertical integration, which is used to describe the integration of European policies on a national level.

⁴ M. Herodes, C. Adelle, and M. Pallemarts, 'Environmental Policy Integration at the EU Level—A Literature Review.', *EPIGOV Paper 5*, 2007, p. 10.

⁵ S. Oberthür, and C.Kelly. 'EU leadership in international climate policy: achievements and challenges', *The international spectator*, vol. 43, no. 3, 2008, pp. 35-50.

⁶ Interview with a biofuel expert from Energy Community, by telephone on 19 April 2016.

⁷ Interview with a policy adviser of a political Group of the European Parliament, conducted in Brussels on 30 March 2016.

combustion engines and, in principle, they emit almost no added greenhouse gas over their lifecycle. The main idea behind this is the so-called carbon cycle: when a biofuel is burned, it produces the same amount of CO₂ that was taken up by the feedstock when it grew on the field. In other words, the feedstocks used to produce biofuels take up the same amount of CO₂ as is emitted through fuel combustion. This explains why biofuels have been an attractive solution to integrate environmental concerns in transport policy: the carbon cycle means that, in principle, these fuels produce almost no added greenhouse gases.

Policy makers at the European level started to consider stimulating the use of biofuels in transport – locating them in a climate narrative –⁸ from 1994 onwards. In 2003, the EU started its common biofuel policy with the so-called Biofuels Directive. This Directive was aimed toward stimulating the use of biofuels in transport. Combatting climate change was central to the arguments for this policy.⁹

In 2008, the Climate and Energy package for 2020 reinvigorated the ambition of the EU to horizontally integrate environmental policy. The importance of transport for reaching the EU's climate goals and the use of biofuels to reach this goal was re-confirmed.¹⁰ The role of biofuels to reduce emissions in transport was reinforced: the Climate and Energy package also set a goal for a 10%-uptake of biofuels in the energy mix for transport that was implemented through the replacement of the Biofuels Directive by the Renewable Energy Directive, which was proposed in 2008. A second directive, the Fuel Quality Directive, which was revised from 2007 onwards, equally impacted this goal. The final agreement on this directive stated that greenhouse gas emissions from transport should be reduced by at least 6% by 2020. It specifically states that this should in large part be achieved through the use of

⁸ Oberthür and Kelly, *op. cit.*, p. 53.

⁹ *Ibid.*, p. 55.

¹⁰ L. Ryan, F. Convery, and S. Ferreira. 'Stimulating the use of biofuels in the European Union: Implications for climate change policy.', *Energy Policy*, vol. 34, no. 17, 2006, pp. 3184-3194.

biofuels, and obliges biofuels to give a greenhouse gas saving of at least 35%, and 50% by 2017.

Around the same time – even though the Climate and Energy package restated the importance of biofuels to reduce greenhouse gas emissions in transport – the initial enthusiasm about biofuels of 2003 had started to change in the run up to the decision-making of the Renewable Energy and Fuel Quality Directives. Scientific evidence trickled through that biofuels were not the perfect solution they had seemed to be. In general, biofuels were criticized for two reasons: the food vs. fuel debate and the indirect land use change debate.¹¹ The food vs. fuel debate states that the higher production of biofuels in the EU causes higher global food prices, resulting in increased malnutrition in regions with high poverty. This problem caused an important degree of public debate on the ethical side of biofuels in general, but also had an impact on EU-level¹². The second debate on ILUC states that the production of biofuels does not only lead to direct change in land use – where fields are increasingly used to produce either feedstocks or food – but also to indirect land use change. ILUC is an agro-economic theory of land use change which starts from the assumption that the increased demand for biofuels in the EU incentivises farmers to grow so-called ‘feedstocks’ – plant material used to produce biofuels – in a trade-off with food production, thus raising international food prices. This leads to the convergence of land with a high ‘carbon value’ (i.e. land that captures and stores large amounts of CO₂, such as rainforests) to agricultural land to produce food, which has a low carbon value. This change in the land use results in higher ‘life cycle’ emissions (i.e. emissions from the production until the consumption of the biofuel) of biofuels, as CO₂ is released during the conversion of these lands and, afterwards, less carbon is stored in the soil. This theory is central to this article because it raised strong doubts about biofuels as a solution to reduce emissions from transport and thus constituted an important

¹¹ Ackrill, Robert, and Adrian Kay, *The Growth of Biofuels in the 21st Century: Policy Drivers and Market Challenges*, Basingstoke, Palgrave Macmillan, 2014., p. 53.

¹² Interview policy adviser political Group, *op. cit.*

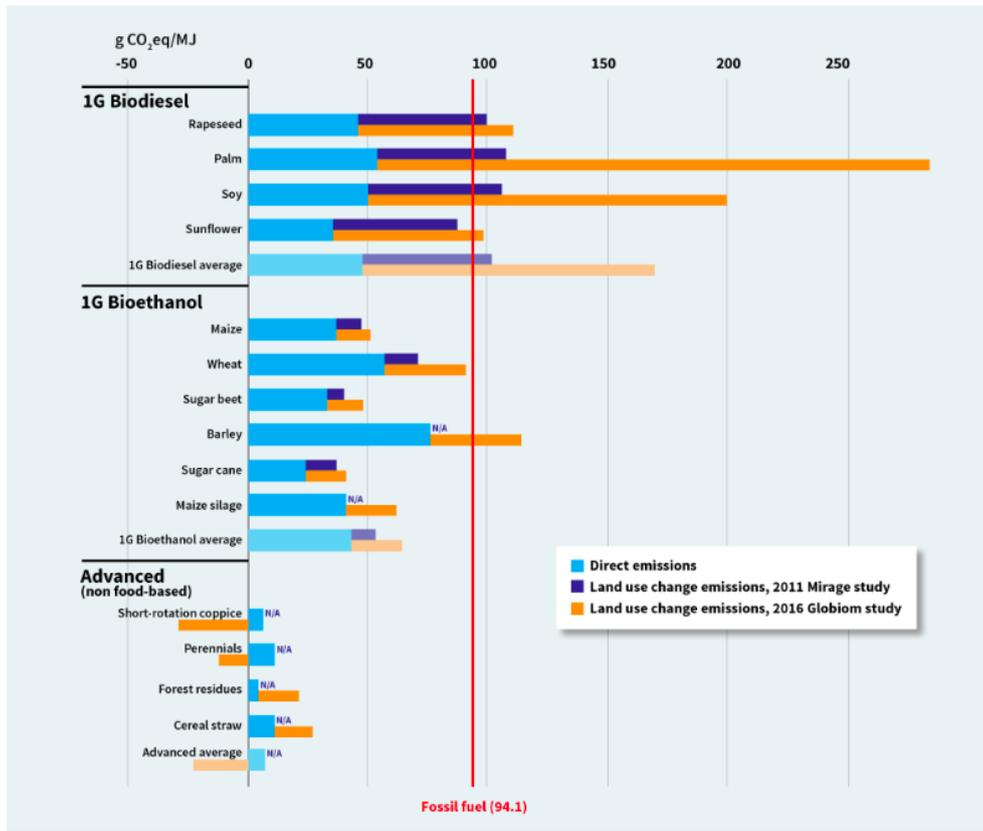
threat to the idea that biofuels contributed to the horizontal integration of environmental policies in climate and energy policies.

The debate on ILUC in the EU was sparked by Searchinger, who estimated the added CO₂-emissions of some (first generation)¹³ biofuels at 50 to 90%.¹⁴ These results were heavily contested, with some researchers suggesting lower figures, others higher and others still suggesting that there was no effect at all. This difference is due to the assumptions made during the calculations: to measure the reason why high-carbon land is converted to farmland for food production, one has to measure a range of economic, social, legal and biophysical factors. The choice and operationalization of factors have an important impact on the outcome of the study. The most recent and complete study about ILUC was the ‘Globiom study’. The results of this study and the arguably second-most influential ‘Mirage’ study are represented in Figure 1.

¹³ We can distinguish three ‘generations’ of biofuels. First generation biofuels are generated from crops specifically grown for biofuel production, such as rapeseed. Second generation biofuels are generated from lignocellulosic plant materials, which are left after the crop is harvested, such as the stalks of wheat. Third generation fuels, finally, use ‘non-conventional’ materials as feedstock, such as algae.

¹⁴ Searchinger, *et al.*, ‘Use of U.S. croplands for biofuels increases greenhouse gases through emissions from land-use change’, *op. cit.*, pp. 1238-1240.

Figure 1: estimates of ILUC effects on GHG emissions compared to fossil fuels, based on the IFPRI (blue) and the Commission's GLOBIOM study (orange).



Source: Transport and Environment, 2016

Figure 1 shows that both studies give quite different results. However, it is clear that biodiesel, in both studies and almost every case, in fact produces more greenhouse gases than conventional fuels. Bioethanol performs better in general, but the greenhouse gas savings are reduced by at least about ten percent. We can conclude that there is a scientific consensus that ILUC affects greenhouse gas emissions, and that this effect is different for different kinds of biofuels. However, the results of research on ILUC have an important margin of error, which allowed for a strong politicization of the evidence (cf. infra) and even denial that there was any effect at all.

Even though there was no scientific consensus on the extent of its effects, the problem of indirect land use change questioned the effective greenhouse gas savings of biofuels. In this

way, the problem was a major threat to the idea that biofuels could contribute to ‘decarbonizing transport’ and was therefore heavily discussed during the decision making (2007-2009) of the Renewable Energy and Fuel Quality Directives.

2. The agenda-setting process for ILUC: the institutions and ENGOS

From 2006 onwards, the scientific evidence of ILUC started trickling through the EU institutions. Tim Searchinger¹⁵ notified the Commission about the possible repercussions of his findings for the European biofuel policy and its sustainability in 2006, even before his research was published. At this time, the Commission was working on the Fuel Quality and Renewable Energy Directives, but the main Directorate-General (DG) working on these files (DG Energy) was reluctant to take the problem of indirect land use change into account in its proposals¹⁶ and dismissed the arguments that Searchinger brought to the table.¹⁷ DG ENVI – which had always had some lingering doubts about the true sustainability of the biofuel policy –¹⁸ managed to convince the other DGs¹⁹ to consider taking up the problem of ILUC in the Renewable Energy Directive. In this way, the problem of ILUC first appeared in an official document in 2006, when the European Commission (EC) started the public consultation of stakeholders in the lead-up to the legislative proposal for what would become the Renewable Energy Directive.

Meanwhile, the ENGOS had become active on the subject. They suggested²⁰ dealing with the added greenhouse gas emissions by including ‘ILUC-factors’²¹ in the legislation.

¹⁵ Searchinger *et al.*, ‘Use of U.S. croplands’, *op. cit.*, pp. 1238–1240.

¹⁶ Official of the European Commission. Interview conducted in Brussels on 16 March 2016.

¹⁷ *Ibid.*

¹⁸ *Ibid.*

¹⁹ Interview policy adviser political Group, *op. cit.*

²⁰ Transport & Environment, Response to the public consultation on biofuel issues in the new legislation on the promotion of renewable energy, 2007.

²¹ These would add the greenhouse gases emitted by ILUC (as calculated in the Commission’s study) to the calculation of DLUC which was already taken into account.

They started lobbying the different institutions, with different results. The Commission, even though it had stated in its consultation that biofuels likely had an indirect effect on land use, chose not to include it in its proposal for the RED.²² Our interviews confirmed that this non-inclusion of ILUC was due to the fact that DG Energy was more open to the suggestions of lobbyists for first-generation biofuel producers.²³ DG Environment, which was more open to ENGOs, hadn't been able to move DG Energy to include ILUC in its proposal.²⁴

The ENGOs then turned to the other institutions to convince them to make an amendment to the legislation that would ask for the Commission to estimate the effect of ILUC and, on the basis of these estimates, add 'ILUC-factors' to the legislation. Within the Council, they found little support because of a blocking minority against ILUC-factors.

It was in the European Parliament that the ENGOs found a stronger ally. Within the Committees responsible for the FQD and the RED, an agreement was made to include an amendment which would have accounted for ILUC in these directives. The informal trilogues after the Parliament and Council's decisions on the Directives took long and hard negotiations, and at the end only the problem of indirect land use change was left.²⁵ The negotiating parties finally compromised by not immediately taking up ILUC-accounting in the Directives, but asked for a report of the Commission on ILUC, which could be accompanied by a legislative proposal.

The final amendment in the Fuel Quality and Renewable Energy Directives stated that:

The Commission shall, by 31 December 2010, submit a report to the European Parliament and to the Council reviewing the impact of indirect land use change on greenhouse gas emissions and addressing ways to minimise that impact,

and specified that

²² European Commission, Proposal for a Directive of the European Parliament and of the Council on the promotion of the use of energy from renewable sources, COM(2008)0019, Brussels, 23 January 2008.

²³ Interview European Commission, 16 March, *op. cit.*

²⁴ *Ibid.*

²⁵ Interview with an official, European Commission, by telephone on 12 April 2016.

The report shall, if appropriate, be accompanied, by a proposal, based on the best available scientific evidence, containing a concrete methodology for emissions from carbon stock changes caused by indirect land use changes.

On 22 December 2010, the Commission published this report.²⁶ According to a Commission official,²⁷ the Commission didn't want to publish this report by this date because it hadn't gathered enough scientific evidence. However, shortly before the submission deadline, the Commission decided to quickly draft a report without taking a decision.²⁸ In the report, the Commission said that it would make another impact assessment and decide on a legislative proposal by July 2011. In the end, the Commission further postponed this until October 2012. According to a Commission official, this decision was not taken to "drag its feet", but because the process of collecting evidence was long and complex. This impact assessment was accompanied by a legislative proposal for what would become the 'ILUC Directive', a much-discussed file in which the involved actors often had opposing preferences, between institutions as well as within. What is most interesting for this article, however, is the phase of agenda setting for this Directive, as the agenda setting phase is the moment at which the future of a dossier is decided. It is the phase where a problem either disappears quietly or receives the attention of decision-makers. This means that, for the horizontal integration of environmental concerns in transport and energy policies for which ILUC is our case study, getting these concerns on the agenda is a first major obstacle. We therefore ask the research question "Why and how did ILUC enter the European policy making agenda?"

The agenda-setting phase is the phase in the beginning of the policy cycle characterized by "the politics of selecting issues for active consideration".²⁹ It became apparent that the European Commission refused to act on the scientific information on ILUC under pressure of

²⁶ European Commission, Report from the Commission on indirect land-use change related to biofuels and bioliquids, COM/2010/0811, 2010, consulted on 19 February 2016 at <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52010DC0811&from=EN>

²⁷ Interview European Commission, 16 March, *op. cit.*

²⁸ Interview European Commission, 16 March, *op. cit.*

²⁹ R. W. Cobb & M. H. Ross, 'Agenda Setting and the Denial of Agenda Access: Key Concepts', p. 3 in R. W. and M. H. Cobb (Eds.) *Cultural Strategies of Agenda Denial*, Lawrence, 1997, University Press of Kansas, cited in David Dery, 'Agenda setting and problem definition.' *Policy Studies*, vol. 21, no. 1, 2000.

DG Energy, even though in its public consultation it had said that ILUC was a potential problem. The Parliament then made an amendment in the Fuel Quality and Renewable Energy Directives to include ILUC accounting and after trilogues managed to secure an amendment asking the Commission for a report on ILUC, joined by a legislative proposal if appropriate. It quickly became apparent, however, that this decision-making process within the European Parliament had been strongly influenced by the lobbying efforts of environmental NGOs (cf. infra). Therefore, we hypothesize that ENGOS used their preferential access to the European Parliament³⁰ to put the problem of ILUC on the agenda. The rest of this article will therefore be devoted to studying the role of ENGOS in putting ILUC on the agenda by influencing the Parliament.

3. Tales of power: ENGOS, coalitions and resources in the ILUC file

In order to map how the stakeholders organized themselves, we make use of some of the assumptions of the Advocacy Coalition Framework³¹ and theories of the use of scientific evidence to construct a model of how the ENGOS influenced the European Parliament. We will only draw on some of the assumptions of the framework to describe how advocacy groups have crystallized around the ILUC dossier and were organized in coalitions, as this will be instrumental for our analysis of the institutional access of these actors. Other assumptions of the ACF, however, are not taken up, such as its assumption that institutions (such as the EP) belong to advocacy coalitions.

On the basis of the ACF, we assume that:

- actors act in a coordinated manner, forming advocacy coalitions which are **based on beliefs**, but actors **act in a rational way**;

³⁰ Interview policy adviser political Group, *op. cit.*

³¹ This framework was developed in the 1980s by P. Sabatier and H. Jenkins-Smith.

- expert information can induce a process of “**policy-oriented learning**”;
- the action potential of advocacy coalitions and their members is determined by the **resources** of these coalitions. These can be organisational resources (such as staffing, expertise, etc.) or political resources, such as access to MEPs.³² By belonging to an advocacy coalition, stakeholders can make use of these coalition resources.

These assumptions made by the ACF are most useful when one studies problems where there are substantial goal conflicts and in the presence of technical disputes (“wicked problems”). The subject of ILUC has been identified in the literature as a “wicked problem” par excellence.³³ Because of its attention to the role of scientific evidence in dealing with these disputes, this theory is also compatible with our goal of investigating the role of scientific evidence in the process.³⁴

The second category of theories we will draw on are those which explain the role of scientific information in the policy process. We will use these theories to construct a model of how the ENGOs tried to influence the European Parliament. They are complementary³⁵ with the assumptions we made on the basis of the Advocacy Coalition Framework. For this, we draw on the work of Weible³⁶ who identifies several ways in which expert-based information is used in the policy-making process. We will make use of two of these categories in our research: the ‘learning’ and the ‘politicization’ approaches.

The first way in which expert-based information can be used is through a process of learning. Learning of information is a cognitive process in which scientific knowledge affects

³² J. Dreger, ‘*The Influence of Environmental NGO’s on the Design of the Emissions Trading Scheme of the EU An Application of the Advocacy Coalition Framework.*’, *Bruges Political Research Papers* 9, 2008., p. 16.

³³ T. Vogelpohl, M. Mondou & E. Dunkelberg, ‘When the boundary arrangement doesn’t fit the problem structure: making sense of the political conflicts over the EU’s biofuels policy.’, retrieved on January 2nd, 2016 at http://www.icpublicpolicy.org/IMG/pdf/panel_23_s1_vogelpohl_et_al.pdf, p. 5.

³⁴ P. Sabatier., ‘Top-down and bottom-up approaches to implementation research: a critical analysis and suggested synthesis.’, *Journal of public policy*, vol. 6, no.1, 1986, pp. 21-48.

³⁵ C. Weible, ‘Expert-based information and policy subsystems: a review and synthesis.’ *Policy Studies Journal* vol. 36, no. 4, 2008, pp. 615-635.

³⁶ *Ibid.*, pp. 619-620.

the beliefs of stakeholders and decision-makers alike, without instrumental use of this knowledge. This distinguishes learning from the political use of information. This second use of information occurs when actors use information they receive from experts in a way that helps them achieve their objectives. This politicization can “include the distortion and/or the selective use of information”.³⁷ Later in this article, we will use this theory to explain how ENGOs made use of the inherent uncertainty of ILUC modelling to compose evidence that was in line with their policy preferences. We will show that they used this politicized evidence to convince MEPs about the necessity of putting ILUC on the agenda.

Now that we have established the necessary theoretical basis to study the behaviour of ENGOs, we outline how the advocacy coalitions crystalized around the ILUC-file, so we can further on investigate the political obstacles to the integration of environmental concerns in the EU’s biofuel policy.

We can perceive two advocacy coalitions in the ILUC-dossier, which we will call the “environmental coalition” and the “business coalition”. The existence of these coalitions was confirmed in the 2010 Commission report on ILUC. In this report, the Commission stated that

[...] respondents were divided into two groups. Most respondents from industry, farmers' associations and overseas countries considered that [...] no further action specific to biofuel policy should be taken. On the other hand, most NGOs [...] considered that further action was needed.³⁸

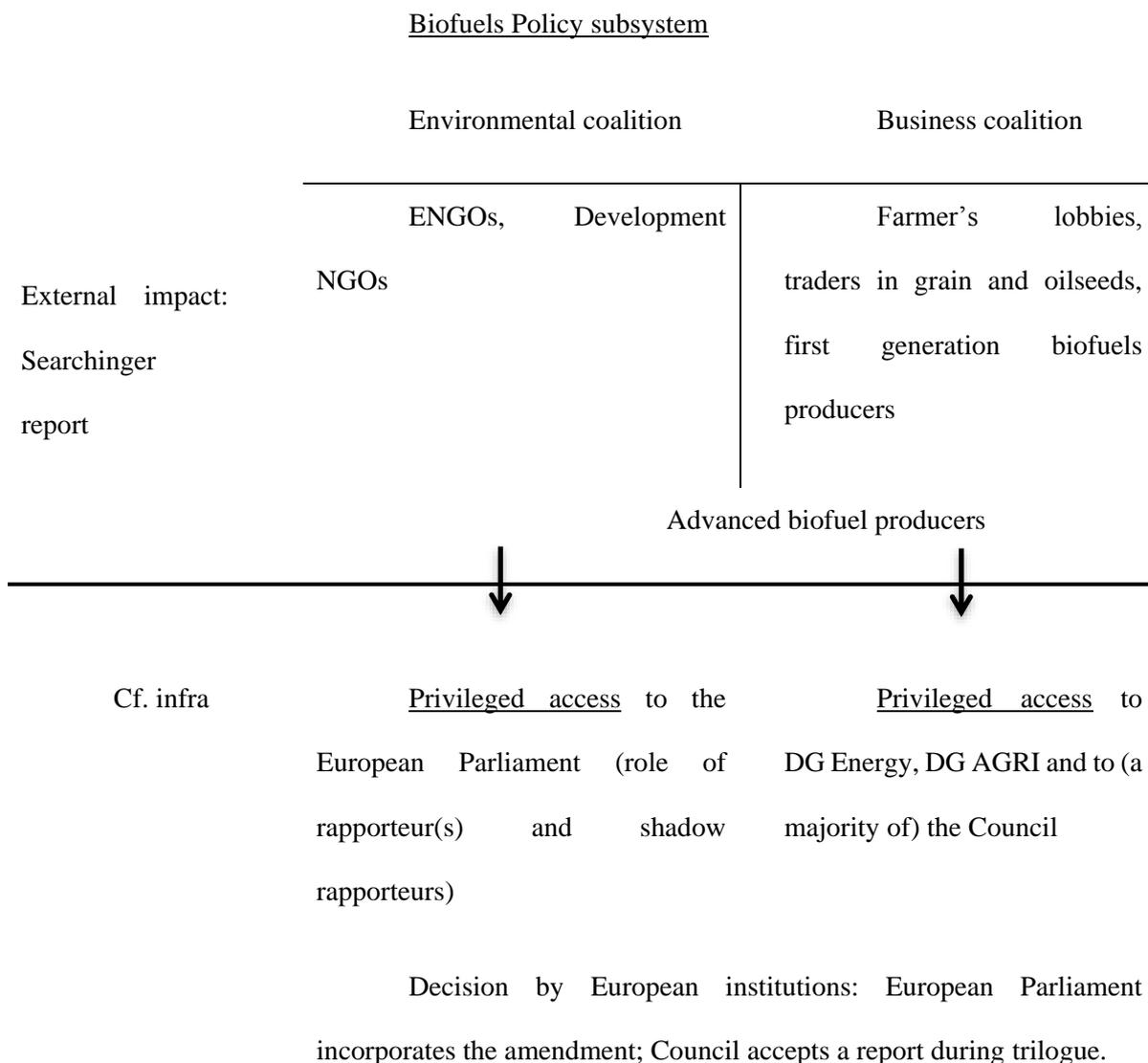
These coalitions were then cross-checked with the list of registered organizations that replied to the Commission consultation of 2010. This gave us a more complete overview of which organizations were active in which coalition, and what the arguments of these groups were. Finally, the existence and structure of these coalitions were confirmed during several interviews.³⁹ A schematic representation of these coalitions can be found in Figure 2.

³⁷ Weible, ‘*Expert information*’, *op. cit.*, p. 620.

³⁸ European Commission, ‘Report from the Commission on indirect land-use change related to biofuels and bioliquids’, COM/2010/0811, 2010.

³⁹ Interview European Commission, 16 March, *op. cit.*; Interview policy adviser political Group, *op. cit.*; Interview with a specialist of an ENGO in Brussels on 14 March 2016.

Figure 2: Advocacy coalitions in the biofuels policy subsystem



The “environmental coalition” is mainly composed of environmental NGOs (such as Transport and Environment, Wetlands Europe,...).⁴⁰ These NGOs joined forces with development-NGOs, such as the Flemish ‘Broederlijk Delen’, Caritas International, or Oxfam that are (mainly) development-aimed. The environmental NGOs, per definition, share an ‘environmentalist’ core belief; they give preference to environmental concerns over other

⁴⁰ One could further distinguish between environmental NGOs which work on climate change, such as T&E, and NGOs that work on environmental consequences of the Common Agricultural Policy, such as the European Environmental Bureau or Birdlife Europe. Because the division in coalitions is purely functional for the rest of this paper, we chose not to make this distinction further on.

potential concerns. The position of ENGOs towards biofuels was impacted⁴¹ by ILUC through a process of policy-oriented learning: before 2006, the position of ENGOs was that biofuels were a partial solution to deal with greenhouse gas emissions.⁴² The scientific evidence in ILUC was further proof that biofuels contributed to a higher emission of greenhouse gases instead of lowering emissions.

The development-NGOs, by definition, have a ‘development’ core belief. They also share the policy core belief that biofuels are problematic, not necessarily because of greenhouse gas emissions, but mainly because of the effect they have on development, human rights, and the direct environment and living conditions.⁴³ Although the food vs. fuel-debate (which also erupted around 2006) was central to their arguments, they joined the environmental NGOs in lobbying the ILUC-dossier.

Whereas the environmental coalition was further united by the scientific debate around ILUC, the business coalition was more divided on this problem. While this business coalition was more diverse than the environmental coalition, we can distinguish four main groups of stakeholders: the farming lobby, the importers of grain and oil seeds, the producers of first generation biofuels and the ‘advanced biofuel producers’. These lobby groups share a common core belief of ‘economic growth first’, and share a policy core belief that biofuels as such should be promoted. On the effect of ILUC on the farming lobby, the importers of grain and oil seeds and the producers of first generation biofuels, we can be short: they maintained their coalition. Concerning ILUC, specifically, they were against any accounting for indirect greenhouse gas emissions, and stressed the importance of economic security and the uncertainty of the modelling. A slight crack seemed to appear in the coalition because of the position of the advanced biofuel producers. They had economic interests in lobbying in favour

⁴¹ Interview with specialist of an ENGO, 14 March, *op. cit.*

⁴² Transport & Environment, ‘Biofuels strategy published ... and criticized’, 15 March 2006, consulted on 27 february 2016 at <https://www.transportenvironment.org/news/biofuels-strategy-published-and-criticised>.

⁴³ Oxfam, ‘The Hunger Grains, time to scrap EU biofuel mandates’, *Oxfam Briefing paper 161*, 2012.

of ILUC-accounting, as no feedstocks from agricultural land are necessary for the production of advanced biofuels (second and third generation), but they finally decided not to join the environmental coalition (hence their position in figure 2). The reason for this is that many of the companies that were part of lobby groups for advanced biofuels also had interests in the production of first-generation feedstocks,⁴⁴ which were criticised by ENGOs. The advanced biofuels producer lobby groups selected the lowest common denominator⁴⁵ to set out their political line on ILUC and decided to, whenever possible, stay silent on the issue.⁴⁶ In terms of beliefs and allegiance, they remained firmly within the business coalition.

Each of these groups had a specific level of access to the different institutions (see figure 2). For the ENGOs, the main points of access were the European Parliament and DG ENVI, while their access to other DGs of the Commission and to the Council were lower. This access for ENGOs to the Parliament was an important institutional opportunity, but was in itself not sufficient: they still had to influence decision-makers there.

4. Measuring influence

The objective of this article is to measure the influence of ENGOs on the European decision-making process and specifically on the European Parliament. Measuring the impact of NGOs and other stakeholders on the policy process is notoriously difficult. As Betsill and Corell⁴⁷ state, researchers run the risk of confusing correlation with causation. In most studies, researchers rely solely on “NGO activities [...] and/or NGO resources”, which describe how NGOs/stakeholders engage in the decision-making process, but do not try to establish a causal link between these activities and the outcome of the policy. This means that often, a correlation

⁴⁴ Interview with an expert of an advanced biofuel producer. Interview conducted by telephone on 26 April 2016.

⁴⁵ *Ibid.*

⁴⁶ Interview with a representative for an advanced biofuel producer, Questions via e-mail on 29 April 2016.

⁴⁷ M. Betsill, and E. Corell, ‘NGO influence in international environmental negotiations: A framework for analysis.’, *Global Environmental Politics*, vol. 1, no. 4, 2001, pp. 65-85.

is observed and the causation is assumed. However, it is not because a position of a Member of the European Parliament (MEP) corresponds to that of an NGO that this last actor had an influence on the first.

In order to prevent this problem, we followed the methodology of process tracing to measure the impact of advocacy coalitions on the decision making process.⁴⁸ This prescribes that the researcher should establish that “NGOs/stakeholders tried to transmit knowledge and information to the negotiators, whether delegates responded to that information, and whether those responses were consistent with the NGO position”.⁴⁹

We will focus on the actions which were undertaken by the ENGOs (we will identify three different strategies) and how this influenced the European Parliament. These strategies could be seen as the independent variables. The dependent variable we will measure is the support within the European Parliament for including an amendment in the Fuel Quality and Renewable Energy Directives. Because this dependent variable – the ILUC amendment – is only a small part of both Directives, we cannot draw conclusions from the formation of a majority. Our solution to this was to verify the impact of ENGOs through interviews with these NGOs and a European Parliament official. This means that for studying the impact of ENGOs on the decisions of the Parliament, we will rely on the perception that both actors had of this influence of ENGOs on the Parliament. This allows us to establish a causal relation between the actions of the ENGOs on the one hand and the dependent variable we study (i.e. the inclusion of the demand for ILUC accounting) on the other.

Applying the method of process tracing, we first of all established the possibility of a causal relation by following the causal process through a document analysis. During this analysis, we checked whether the time sequence of the documents could imply causality. Say

⁴⁸ Betsill, and Corell, *op. cit.*, p. 73.

⁴⁹ Betsill and Corell, *op. cit.*, p. 72.

we have ‘event 1’, the transmission of evidence and creation of awareness in the European Parliament, and ‘event 2’, the Parliament taking up ILUC factors. This means that if ‘event 2’ (the Parliament takes ILUC factors into account) followed later in time than ‘event 1’, that we assume that there is circumstantial evidence for the fact that ‘event 1’ caused ‘event 2’. We will specifically use this technique when we research whether the resources ENGOS drew from their advocacy coalitions helped them to influence the European Parliament. For the other strategies of influence, this sequence of events was clear and is thus not explicitly mentioned.

This is, however, only the first phase in establishing causality. If possible, one also has to establish certainty about the causal relation between event 1 and event 2 directly. We chose semi-structured interviews to establish this causality. To fully establish a causal relation between the different events, we checked the perceived causality both during interviews with the ENGOS and with the European Parliament (cf supra).

The use of process tracing as a methodology also had implications for the selection of our interviews. Tansey⁵⁰ suggests that when one uses process tracing as a methodology and is looking to establish causal relations through elite interviews, one should make use of non-probability sampling to select the interviewees. The reason for this is that when trying to establish a causal relation between, for example, the actions of an ENGO and those of MEPs, it is crucial to interview the people who can provide the best information. This means that, instead of doing a random sample of decision-makers and representatives of ENGOS, we looked for the people that were able to provide the most accurate insights in the causality between the actions of ENGOS and the decision-making in the European Parliament. For the research which is reported in this paper, we chose to use a snowball sampling technique to select interviewees. We started by asking Prof. Dr. James Palmer,⁵¹ an expert on the European

⁵⁰ O. Tansey, ‘Process tracing and elite interviewing: a case for non-probability sampling’, *Political Science & Politics*, vol. 40, no. 4, 2007, pp. 765-772.

⁵¹ J. Palmer, researcher at Oxford University. Questions via e-mail, 10 February 2016.

decision making on ILUC, for the people who were most likely to have the best insight in the decision-making process in the EP. In the next interviews, we then repeated the same procedure, thus identifying several key persons in the decision-making process who were very knowledgeable about the role of ENGOs and the Parliament. We managed to interview most of these key persons. The officials from the Commission which we interviewed, were present at the trilogue negotiations, and the official of the EP had a central position in the decision-making process of the two directives we study in this paper.

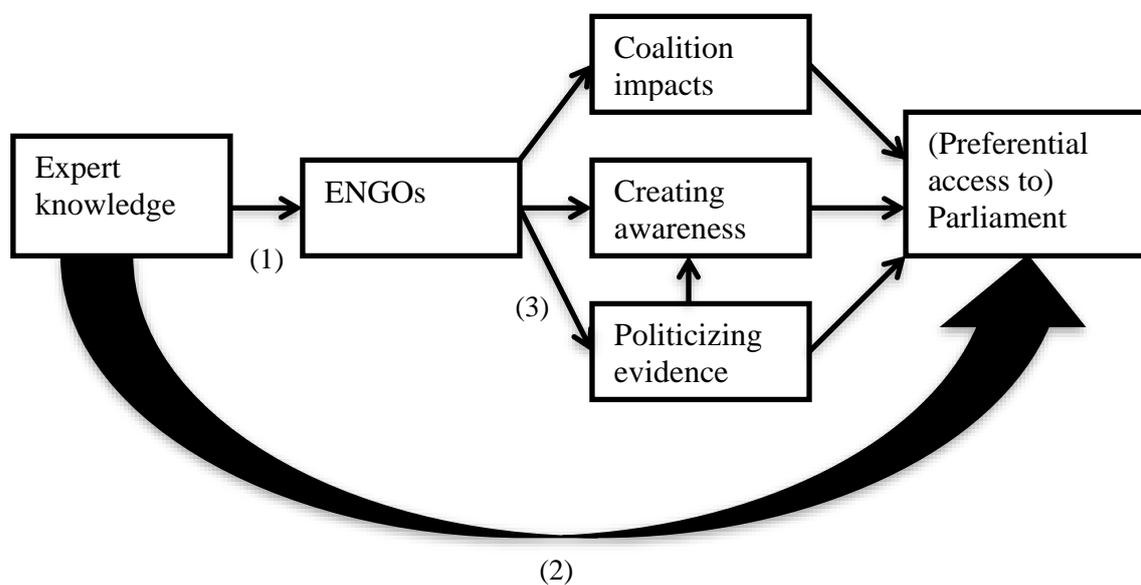
5. Putting ILUC on the agenda: access of ENGOs to the EP and impact on negotiations

On the basis of the evidence collected in our interviews, we don't see the European institutions as part of advocacy coalitions as such, but rather that lobby groups have privileged access to these institutions. This has the effect that the coalitions of NGOs have to find ways to influence these decision-makers. For ENGOs specifically, this means that they used specific strategies to influence the European Parliament, which we will describe further on. In our interviews, it was confirmed that the ENGOs had a privileged access to the central MEPs in the Directives, which increased the effectiveness of their strategies (cf. *infra*).

Based on our interviews with ENGOs and the Parliament, we can distinguish two different paths of action that were used by the ENGOs to convince the EP of their ideas. ENGOs tried to influence the Parliament directly through two science-based strategies: first, ENGOs politicized evidence; and second, they actively tried to create awareness among MEPs about the expert knowledge on ILUC. We can call these two strategies the 'science-based' path of access to the European Parliament. We had hypothesized that this would be the way ENGOs influenced the EP before we conducted our interviews, based on the theories of the use of scientific evidence in policy making.

The second path is where the resources from the coalition of NGOs influenced the European Parliament. Opposite of the ‘scientific path’, the ‘coalition path’ is not based on translating the science of ILUC, but an alternative to this path. This path was inductively identified from our interviews and wasn’t anticipated. Based on the scientific literature, we had assumed that the ILUC debate had been framed only in terms of greenhouse gas accounting, and that other factors than added GHG emissions didn’t come into play. However, as we will argue later, it became clear in our interviews that ENGOs, by actively working together within the ‘environmental coalition’, indirectly tried to impact the decision-making in the EP through cooperation with development NGOs. These factors and the relations between them are represented in the following model:

Figure 3: Model of influence of ENGOs on the European Parliament.



Relation (1) is based on the ‘learning approach’ explained above. To study the effect of this expert knowledge on these coalitions, we used some assumptions of the Advocacy Coalition Framework. Next, we argue that relation (2), direct learning by the Parliament, has a very limited effect on MEPs, as they have to make sense of technical details to adopt a point

of view. Taking into account the generalist nature of the EP and the time pressure in the decision-making process, this is highly unlikely.⁵² Instead, we argue they prefer to rely on information supplied to them by a coalition with which they identify. This hypothesis was confirmed during interviews.⁵³ This supposes that ENGOs have played a crucial role in gathering and politicizing evidence –which corresponds to use (3) of evidence in the policy process- in order to convince MEPs and by creating awareness among them about the problems caused by ILUC. The third strategy of influence is not science-based, but is used when science translation fails: ENGOs then turn to influencing the Parliament via allies in the advocacy coalition. As is prescribed by the process tracing methodology, we will look at the three categories of actions that ENGOs took to lobby the European Parliament. We established the effect of each strategy on the European Parliament’s behaviour through interviews with the involved actors in the institutions. Finally, we will verify the extent of the effect of these actions on the agreement in the Parliament’s Committees and the final agreement with the Council.

The first path through which the ENGOs tried to influence the European Parliament is that of scientific evidence. They did this in two ways: 1° by gathering evidence from a network of researchers and politicizing this evidence, 2° by creating awareness within the European Parliament on the problem of ILUC.

First, we can distinguish the ENGO action of ‘politicizing evidence’. In the decision-making process that preceded the Renewable Energy Directive, ENGOs created and ‘politicized’ evidence by gathering expert knowledge to estimate the possible effects of ILUC. This politicizing of evidence was meant to supply the European Parliament (and other institutions, such as the Council) with studies from the ‘green’ stakeholders as a

⁵² F. Fischer, *Citizens, experts, and the environment: The politics of local knowledge*, Duke University Press, 2000.

⁵³ Interview policy adviser political Group, *op. cit.*

counterbalance to scientific evidence of the opposing coalition, in this case the business lobby. Fischer⁵⁴ calls this phenomenon the ‘politics of counterexpertise’, in which the uncertainty over scientific knowledge creates a margin of discussion. This margin of discussion is then captured by the different political ideologies that are present in the debate.

In a first instance, during the preparation phase of the RED, scientific knowledge about ILUC and the consequences of different modelling designs was still very scarce. This meant that during this phase, it was crucial for the ENGOs to gather scientific evidence themselves. They relied in part on information coming from the Commission’s Joint Research Centre, but were also very actively asking researchers for additional information, who were happy to help them out⁵⁵. One of these scientists was Searchinger, but ENGOs also drew on a wider network of scientists with whom they discussed, forming an image of the scientific knowledge in order to construct their arguments.⁵⁶

The ENGOs used this information vis-à-vis the European Parliament, but also presented other institutions⁵⁷ with their information, ‘politicizing’ the arguments in a way that was favourable to their cause. By this we do not mean that they tried to consciously distort or forge the research they were informed about: by politicizing we mean that the ENGOs used the evidence and assumptions that were in line with their goals. Of course, it is common sense that a lobbyist, when confronted with certain methodological choices or a margin of error, wouldn’t choose the option that is opposite to his or her view. This common sense is captured by the theory of ‘counterexpertise’ (cf. supra).

⁵⁴ Fischer, ‘*Citizens, experts, and the environment.*’, *op. cit.*, p. 22.

⁵⁵ Interview European Commission, 16 March, *op. cit.*

⁵⁶ Interview with a senior policy officer of an ENGO by telephone on 22 April 2016.

⁵⁷ *Ibid.*

Research by Humalisto⁵⁸ has shown that ENGOs, in order to advance their goals, re-framed the scientific evidence on the greenhouse gas emission effects of ILUC to make it, among others, seem more certain than science would suggest.⁵⁹ In relation to the European Parliament, this means that ENGOs used the evidence to suggest a higher certainty of the effects of indirect land use change to convince MEPs to take up an amendment for ILUC-accounting.

The politicization of information was confirmed in an interview with a member of an ENGO, who confirmed that ENGOs were specifically looking for evidence that supported their point of view.⁶⁰ A Commission official also confirmed that the ENGOs used the margin of error of the scientific data to their benefit. In this interview, the Commission official⁶¹ suggested that “the ENGOs made little intellectual contribution [to the debate] as, when there were five options possible, they would always take the highest of the five”.

From these three pieces of evidence we can conclude that ENGOs presented the information as being more certain than was supported by science, and that they chose the most favourable results to use when lobbying the EP. However, the information that was supplied was considered very valuable⁶² within the European Parliament, as it was more compatible with the views of the majority that was forming. For this reason, the research was considered to have had an important impact on the decision-making within the EP.⁶³ This confirms our hypothesis that ENGOs played an intermediary role between complex and uncertain scientific evidence and the European Parliament.

⁵⁸ N. Humalisto, ‘Knowledge in Climate Policy Integration: How non-governmental organizations re-frame the sciences of indirect land-use changes for policy makers.’ *Environmental Policy and Governance*, vol.25, issue 6, 2015, pp. 412 -423.

⁵⁹ *Ibid.*, p. 421.

⁶⁰ Interview with a specialist of an ENGO, 14 March, *op. cit.*

⁶¹ Interview European Commission, 12 April, *op. cit.*

⁶² Interview policy adviser political Group, *op. cit.*

⁶³ *Ibid.*

The second way in which ENGOs tried to influence the EP was through the creation of awareness. This factor is based on the fact that ENGOs actively contacted MEPs and confronted them with the politicized evidence they had gathered. This is the reason why in the model of influence above, there is a link between politicized evidence and awareness creation. Within a setting of debated science –or ‘wicked problems’ as we called it before- the presence of politicized evidence is a necessary condition for creating awareness about a problem. You need the right evidence to argue in favour of your goal, which is what ENGOs did: they collected and politicized evidence to substantiate their arguments to MEPs (cf. supra).

The main place where it is crucial for NGOs to create awareness in any file is with the rapporteur and/or shadow rapporteurs of a file, as these are the persons who hold the pen and try to find a majority within the Parliament.⁶⁴ In the decision making of both directives that would include the ILUC-amendment (the FQD and RED), ENGOs had good access to the rapporteur and shadow rapporteurs⁶⁵ and managed to convince them of their point of view:

The EP has always been very pro-biofuels [...] It was only when the indirect impacts of climate change were more evidenced, then it became more difficult. ENGOs really changed the mood on biofuels within the Parliament [...] If you have the key guys, the rapporteurs and shadows, informed, then it's ok, and that's what they managed to do.⁶⁶

The ENGOs found a strong ally with the Greens, specifically Claude Turmes, the rapporteur for the RED, about the consequences of ILUC.⁶⁷ In the end, it was Turmes who acted as the mediator to secure the inclusion of ILUC in both directives: Dorette Corbey, the rapporteur for the FQD, at first didn't include ILUC in her report, but after talking to Turmes, included ILUC in the FQD.⁶⁸

⁶⁴ C. Neuhold, 'The 'legislative backbone' keeping the Institution Upright? The Role of European Parliament Committees in the EU Policy-Making Process.' *European integration online papers (EIoP)*, vol. 5, nr. 10, 2001, p.5.

⁶⁵ Interview policy adviser political Group, *op. cit.*

⁶⁶ *Ibid.*

⁶⁷ *Ibid.*

⁶⁸ *Ibid.*

We double-checked this evidence from the interview with the time sequence of the events to confirm this causal relation. The first time that ENGOs mention ILUC as a problem was in July 2007 in their answer to the Commission consultation on the RED.⁶⁹ Indeed, whereas ILUC originally wasn't included in Corbey's first report,⁷⁰ Turmes and Umberto Guidoni (MEP for GUE/NGL) made an amendment⁷¹ to this report, so that Corbey's second report included an amendment on ILUC in October 2007. This finding supports the evidence of the interview that, when ENGOs became aware of the possibilities for an ILUC policy after the Commission's consultation on the RED, they managed to convince central figures in the Parliament.

However, these rapporteurs needed to find a majority within the Committees and the Plenary, so it is equally crucial to inform individual MEPs who were less involved in the dossier. In this dossier specifically, it was crucial to get a strong position within the Committees, as the Parliament needed a strong negotiation position vis-à-vis the Council if it wanted to amend both directives to include ILUC (cf. *infra*). When we talk about creating awareness about complicated and unsure scientific evidence among MEPs, we need to take into account the generalist nature of the European Parliament. Even though we could verify during our interviews that in 2008, some MEPs were very well informed, and technically complex arguments could be used to create a better understanding of the problem,⁷² not all MEPs were equally involved in or knowledgeable about the ILUC-dossier.⁷³ To convince these members of Parliament, the ENGOs created materials that explained the problem in a less technical way:

⁶⁹ Transport & Environment, 'Response to the public consultation on biofuel issues in the new legislation on the promotion of renewable energy', 2007.

⁷⁰ European Parliament, Committee report on the Fuel Quality Directive, PE392.119, 2007, consulted on 20 April 2016 at [http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2007/0019\(COD\)](http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2007/0019(COD)).

⁷¹ European Parliament, 'Amendments to the report on the Fuel Quality Directive', PE396.443, 2007, consulted on 20 April 2016 at <http://www.europarl.europa.eu/sides/getDoc.do?type=COMPARL&mode=XML&language=EN&reference=PE396.443>.

⁷² Interview senior policy adviser of an ENGO, 22 April, *op. cit.*

⁷³ *Ibid.*

We worked on a movie explaining the phenomenon, brochures, fact sheets, you know, simple materials for them to understand the problem. We used simple words, had comparisons. For example, how many additional cars could you have on the road if you don't do anything about biofuel emissions.⁷⁴

It was confirmed in an interview that the awareness creation by environmental NGOs had been influential in convincing MEPs to put indirect land use change in the legislation.⁷⁵ We can conclude that by applying these first two science-based strategies, the ENGOS played an intermediary role between technically complex and uncertain scientific evidence on the one hand and the generalist, political European Parliament on the other.

The last way in which ENGOS influenced the Parliament was through the advocacy coalitions. This hypothesis is different from the others, as it's not based on scientific information, but on the power that environmental NGOs derived from entering in a coalition with other NGOs. In fact, the ENGOS perceived this channel of influence as a back-up when their science-translation strategy failed:

Science really helped, but [...] it's easy for the other side, the industry, to say [that] models are all wrong. So using the science was hard [...] What was more helpful with MEPs was the food argument, and biodiversity arguments and the land grabbing as well. Of course, for us, ENGOS, climate is the most important thing, but we worked very much with other NGOs, such as development NGOs [on those other topics].⁷⁶

We can conclude that, according to the ENGOS, their coalition with development-NGOs helped them to argue in favour of ILUC-factors when the 'scientific path' failed to deliver. They also actively interacted with development-NGOs to see how they could link these issues to ILUC within the Parliament.⁷⁷ Our document research confirmed that in their briefings, development NGOs linked poverty and land grabbing to the problem of ILUC at the time the RED was being decided upon.⁷⁸

⁷⁴ Interview senior policy adviser of an ENGO, 22 April, *op. cit.*

⁷⁵ Interview policy adviser political Group, *op. cit.*

⁷⁶ Interview senior policy adviser of an ENGO, 22 April, *op. cit.*

⁷⁷ *Ibid.*

⁷⁸ Among others, see: Oxfam, 'Another Inconvenient Truth: How biofuel policies are deepening poverty and accelerating climate change', *Oxfam briefing paper 114*, 2008.

Through document analysis we found that within the Parliament, there was indeed awareness of and support for the linking of the ILUC-amendment to land use rights. This appears from the final report of the responsible committee ahead of the plenary vote.⁷⁹ “[The Commission include in its report on] the impact of EU biofuel policy on direct and indirect land use change, an estimate of the associated carbon emissions *and the implications for land use rights*”.⁸⁰ This amendment shows that, within the responsible Committee, there was a linkage between ILUC and land rights which was supported by a majority of members.⁸¹ This allows us to conclude that (1) development-NGOs were lobbying the EP to support ILUC measures on the basis of development-based arguments, and (2) that a majority of MEPs within the responsible committee supported these arguments. Because of these indications, we can assume that the arguments of development-NGOs resonated with MEPs.⁸²

These findings are in line with the theory of advocacy coalitions, which says that coalitions reduce short-term constraints and increase the available resources.⁸³ It did, however, lead to a situation in which the development-NGOs were criticized for making contradictory assumptions. In an interview, a Commission official⁸⁴ pointed out:

...they managed to convince themselves of the contradictory fact that biofuels meant that there was less land to produce food for poor people, and on the other hand that producing more crops led to deforestation. You had a kind of feeding frenzy of the NGOs. Everybody decided to be against it, and all of them took all of the arguments simultaneously

This problem was later addressed by development-NGOs in several briefings⁸⁵.

⁷⁹Amendment 175 in: European Parliament, ‘Report on the proposal for a directive of the European Parliament and of the Council on the promotion of the use of energy from renewable sources’, A6-0369/2008, 2008.

⁸⁰ This amendment was made by Britta Thomsen, a Danish member of S&D.

⁸¹ Development-based amendments were also made by the rapporteur in other parts of the report, even though there they were not linked to ILUC as such.

⁸² Unfortunately, unlike the previous assumptions, we couldn’t directly establish a causal link for the ILUC-amendment itself due to the limited resources for this thesis, so the evidence remains circumstantial.

⁸³ C. Weible, P. Sabatier, and K. McQueen. ‘Themes and variations: Taking stock of the advocacy coalition framework.’ *Policy Studies Journal* vol. 37, nr. 1, 2009, pp. 121-140.

⁸⁴ Interview European Commission, 12 April, *op. cit.*

⁸⁵ Oxfam, ‘Another Inconvenient Truth’, *Oxfam Briefing Paper*, June 2008.

NGOs thus successfully deployed all three of the strategies of influence we described before. They provided politicized evidence, created awareness among (shadow) rapporteurs and MEPs to include ILUC and made use of their advocacy coalition to convince MEPs who were not swayed by their scientific arguments. For each of these strategies, we have established – on the basis of interviews- a causal relation with the willingness of the Parliament to undertake action to deal with the consequences of ILUC. This strong influence of the NGOs was reflected in the final report tabled in the committee responsible: it contained an amendment that “by 31 December 2010, the Commission shall submit a report [...] containing proposals for the inclusion of the values for emissions caused by indirect change of land use [...] to land use and/or feedstock specific factors.”⁸⁶, completely in line with the goals of the NGOs. It was also confirmed that this line of the Parliament was no coincidence, but that the NGOs had an important impact on this outcome through the three strategies they deployed.⁸⁷ We also established that the ‘non-scientific path’ equally resonated with MEPs via our document analysis.

Crucial to this higher success of NGOs in the Parliament was, without a doubt, their higher degree of access to this institution (see figure 2). This was, in part, due to the presence of Greens in central positions in both the FQD and RED.⁸⁸ This higher access of NGOs to the Parliament is, however, part of a more general phenomenon in which the Parliament is more open to environmental arguments.⁸⁹

Once there was internal support in the Parliament for including ILUC, the real decisions about this topic were not made during the plenary vote in Strasbourg, but during

⁸⁶ European Parliament, ‘Report on the proposal for a directive of the European Parliament and of the Council on the promotion of the use of energy from renewable sources’, A6-0369/2008, 2008, consulted on 21 April 2016 at <http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&mode=XML&reference=A6-2008-369&language=EN>

⁸⁷ Interview policy adviser political Group, *op. cit.*

⁸⁸ *Ibid.*

⁸⁹ B.Kohler-Koch, ‘Organized Interests in the EC and the European Parliament’, *European Integration online Papers (EIoP)* vol. 1, no. 9, 1997, p. 7.

informal trilogue negotiations in Brussels. During these negotiations, the Council opposed including any form of ILUC accounting. The ENGOs had tried to lobby the Council, and even though they softened up the position in the Council⁹⁰, the business coalition was more successful in this institution.⁹¹

The final outcome of the informal trilogue and the final FQD and RED was – as mentioned before – that, instead of “submitting a report containing proposals on ILUC”,⁹² as specified in the Parliament’s final report, the Commission had to “submit a report [...] reviewing the impact of indirect land use change on greenhouse gas emissions and addressing ways to minimise that impact” which “if appropriate [had to] be accompanied by a proposal”. This had as an effect that the Commission was required to write a report, but not necessarily had to make a legislative proposal on ILUC.

The fact that the European Parliament managed to successfully set opens the interesting question about the possibilities for the Parliament to set the agenda, giving it in a way a power of initiative. Even though the EP had put ILUC on the agenda for active consideration, the Commission was still in the driver’s seat, which allows us to suggest that the European Parliament had an ‘incomplete’ agenda-setting power.

This brings up two questions: first, what are the necessary conditions for the European Parliament to play this role, and second, what determines the translation of such a conditional report into actual legislation? More research should be done on this to further explore the ‘incomplete’ agenda setting role of the Parliament, but on the basis of the ILUC-case, we can suggest some ideas.

First, when can the European Parliament exert an ‘incomplete’ agenda setting power? We could suggest two factors that contributed to opened a possibility for the Parliament to

⁹⁰ Interview policy adviser political Group, *op. cit.*

⁹¹ *Ibid.*

⁹² European Parliament, ‘Report on the Renewable Energy Directive’, *op. cit.*

play an ‘incomplete’ agenda setting power in our case study: (1) there was a blocking minority present in the Council, but not a majority against, and (2) rapporteurs entered the trilogue negotiations with a strong amendment, both of which strengthened their bargaining power, which most likely plays an important role when deciding on asking a report to the Commission.

Second, what determines the translation of a conditional report into legislation? Again, we can distinguish two factors from our case study: (1) the wording “if appropriate” which constituted in a way a moral obligation for the Commission to act on any evidence it found. A second condition that we could identify was the pressure that ENGOs tried to exert for the Commission to undertake action. As a representative of an ENGO recalls:

It was difficult to pressure the Commission to make a legislative proposal. We contacted a lawyer [who] said that, [because] the Commission published a report and said ILUC was an issue, it had to make a proposition. We organized a lot of events to put pressure on the Commission, in the Parliament, and then the MEPs asked parliamentary questions on that to the Commission. So then they had to act.”⁹³

The conclusion that the European Parliament can play an ‘incomplete’ agenda setting role has important repercussions for the integration of environmental concerns in the European transport and energy policies. Previous research⁹⁴ has shown that often, the Parliament is more open to environmental ideas and ENGOs than the other institutions are. In dossiers where the Council disagrees with the European Parliament, ENGOs could use this preferential access to the EP and its ‘incomplete’ agenda setting power to set environmental concerns on the agenda of the European transport and energy policies.

⁹³ Interview senior policy adviser of an ENGO, 22 April, op. cit.

⁹⁴ Kohler-Koch, ‘Organized Interests in the EC and the European Parliament’, op. cit., p. 7

6. Conclusion

In this paper, we set out to respond to the research question “why and how did ILUC enter the European policy making agenda?”. We hypothesized that the ENGOs had influenced the European Parliament to include an amendment in the Renewable Energy and Fuel Quality Directives to set the problem of ILUC on the European policy making agenda.

Following the process tracing methodology, we conducted semi-structured interviews with representatives of ENGOs to determine which actions they undertook to influence the European Parliament, and identified three categories and two ‘paths’ of actions. The high influence of ENGOs on including ILUC in the RED and FQD was confirmed in our interviews, and the outcome within the Parliament itself further confirms their strong influence on this institution: the committee responsible wanted to directly include ILUC accounting. These findings constitute the response to our research question: the ENGOs made use of their privileged access to the European Parliament to set the problem of ILUC on the agenda, and succeeded by using scientific evidence, creating awareness and by tapping into the political resources provided to them by development-NGOs.

However, even though this research has shown that ENGOs can play an important role in the decision making process, we must be careful with extrapolating this evidence outside the agenda setting process and to other files. Even though the ENGOs played a crucial role in the agenda setting phase of ILUC, it is likely that they didn’t have the same power further on in the policy cycle. The final ILUC directive was not a complete success for the ENGOs. Nonetheless, the conclusions of this research for the role of ENGOs in the agenda setting process of the ILUC-file specifically remain pertinent. Further research is required to see whether our results can be extrapolated to other stages of the decision making process and to other files.

This paper has contributed to the scientific literature in two ways. First of all, the overview has described the decision-making process and actions of agents – thus contributing to our knowledge about this dossier specifically – but also has implications for our understanding of the broader policy making process. One interesting consequence of our findings for the literature concerns the link between the food vs. fuel and ILUC debates. Our results show that, at least for the European Parliament, the food vs. fuel debate was a hidden driver behind the agenda setting process. The literature on ILUC until present suggested that this debate drew the biofuel critics “into expert procedures which obscure [...] experiences of harm in the global South in order to sustain a pro-biofuel policy,⁹⁵ drawing away the attention from the food vs. fuel debate. However, taking into account our findings, we would in fact suggest that the ILUC-debate provided an opportunity for the development-NGOs. As ILUC accounting would result in a reduced demand for food crops by limiting first-generation biofuels, it provided another way for development-NGOs to reach their objective of reducing the impact of biofuels on food prices. At the same time, it allowed them to increase their resources by joining forces with ENGOs.

Our second contribution is to the literature on the horizontal integration of environmental policy in the transport and energy policies, which was the broader goal of this research. The literature on environmental policy integration identifies the need for research on policy integration in the transport and energy sector from the point of view of political sciences, and states that there is a specific demand for research on the obstacles and opportunities to this integration. We have shown that ENGOs have used the power of the European Parliament in the decision making process to overcome this political barrier. Their strategy was successful, and the Parliament took up an amendment which, in the end, put the issue of ILUC on the agenda and ended up creating a heated public debate on the possibilities

⁹⁵ L. Levidow, ‘EU criteria for sustainable biofuels: accounting for carbon, depoliticising plunder’, *Geoforum*, vol. 44, 2013, pp. 211.

of biofuels to make transport more sustainable. This suggests that ENGOs can play a partial role in overcoming the political obstacles to the integration of environmental concerns by creating awareness of these concerns within the Parliament. However, it must be stated that ENGOs can only play a facilitating role by providing information and arguments; they are not kingmakers. Their role is limited to the preferences of the actors they try to convince. This became most clear in the case of the Council, where they couldn't find a majority to support ILUC accounting. However, this case study has shown that, even if the Council and the Commission oppose the integration of such an environmental concern in the transport policy, the Parliament can provide an opportunity to put this environmental concern on the agenda. We argued that, in the case of ILUC, the Parliament has been able to harness its 'incomplete agenda setting power' to put the problem of ILUC on the agenda, even though this was originally opposed by the Council. In this way, the European Parliament can provide an important institutional opportunity to overcome political obstacles to the integration of environmental concerns in the transport policy. The possibilities of the use of this institutional power of the Parliament to overcome political obstacles merits further research, first of all to expose the conditions under which the European Parliament can play this 'incomplete' agenda setting role in other dossiers, and second, to see under which conditions the incomplete agenda setting role will translate into an effective legislative proposal. From the limited evidence we collected in this case study, we suggest that a strong amendment within the committee responsible might be an important factor for the Parliament to play this 'incomplete' agenda setting role. For the translation of this 'incomplete agenda' into a true legislative proposal, an important condition for success could be conditionality on scientific evidence. The importance of the support from lobby groups would also be an interesting hypothesis to look into.

This research has provided a case study on the institutional obstacles and opportunities for the horizontal integration of environmental concerns in the transport and energy policies from the perspective of political science. All too often, solutions to environmental issues are

present, but are held back by political obstacles. Political science can provide important insights on how these obstacles can be overcome. With our contribution to the scientific knowledge about the ILUC-debate, and by putting this debate in the general setting of environmental policy integration in the transport sector, we hope to have set the agenda for more of such research.

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