

Master Thesis

*Erasmus School of Social and Behavioural Sciences, Erasmus University Rotterdam
MSc International Public Management and Public Policy*

**Power in Context: Understanding Interest Group Influence on the
Nature Restoration Law in the European Parliament**

Djoeke Siebesma - 698819
Supervisor: prof. dr. M Haverland
Second reader: dr. AT Zhelyazkova
Date: 2024, June 26
Word count: 11.992


ERASMUS UNIVERSITEIT ROTTERDAM

Abstract

In June 2022 the European Commission proposed a Nature Restoration Law in an attempt to halt biodiversity loss within the Member States of the European Union. This revolutionary proposal is the first continent-wide, comprehensive law in its kind that holds legally binding targets and deadlines to restore ecosystems. The proposal initially received positive reactions, but once it reached the European Parliament, the process that followed resulted in a legislative rollercoaster. This research investigated the role that interest groups have played this process. The focus is on their preferences and what determines their (in-)ability to secure these preferences in the final policy outcomes, also referred to as ‘interest group influence’. It is expected that their influence is contingent on various contextual variables. These expectations challenges traditional elitist assumptions prevalent in interest group literature. The empirical analysis utilizes process tracing to investigate the legislative process of the Nature Restoration Law within the European Parliament, coupled with preference attainment to evaluate the influence of 21 interest groups. The analysis suggests that, in the case of the Nature Restoration Law, the sub-optimal outcomes for all interest groups are the result of a lack in unity among private interests, high levels of counterlobbying and a committee receptive to the views of the NGOs but held back by the views of the associated committees defending the interests of the primary sectors.

Keywords: interest group influence, lobbying, European Parliament, European Union, European Green Deal, biodiversity, climate change, nature restoration law

Acknowledgements

I would like to thank my thesis supervisor Professor Dr. Haverland for his thoughtful comments and guidance throughout the process of preparing and writing this thesis. I would also want to thank Dr. Zhelyazkova for providing her feedback on this thesis as a second reader. Coming from a bachelor in environmental governance, I have been following the developments on the Nature Restoration Law for quite a while and I am happy to see that we are going to have this law. Furthermore, for me, a completely new world has opened up when I realized how complex the dynamics of interest representation are at the European Union level. This culminated into periods of stagnation, extensive revisions and many times having to start over. However, with the help of Haverland I was able to conduct this research. Led by curiosity, and steered by the good guidance, I have learnt a huge amount recently, for which I am grateful. Finally, I look forward to further expanding this knowledge in the future.

Table of contents

List of Figures and Tables	6
List of Abbreviations.....	7
1. Introduction.....	8
2. Theoretical Framework.....	10
2.1 Literature Review.....	10
2.1.1 <i>Lobbying the European Institutions</i>	10
2.1.3 <i>Interest Group Influence</i>	11
2.2 Conceptual Framework.....	12
2.2.1 <i>Defining Interest Group Influence</i>	13
2.2.2 <i>Interest Group Factors</i>	14
2.2.3 <i>Institutional Factors</i>	14
3. Methodological Framework.....	16
3.1 Research Design.....	16
3.2 Research Method	16
3.2.1 <i>Process Tracing and Preference Attainment</i>	16
3.3 Case Selection.....	17
3.4 IG Selection	17
3.5 Operationalization and Data Collection.....	18
3.6 Validity and Reliability	19
4. Results and Analysis	21
4.1 The Proposal	21
4.2 The Policy Issues	22
4.2.1 <i>Policy Issue I: Targets</i>	22
4.2.2 <i>Policy Issue II: Definitions</i>	23
4.2.3 <i>Policy Issue III: Implementation</i>	23
4.3 The Policy Process.....	24
4.3.1 <i>Phase I: The Rapporteur's Draft Report</i>	26
4.3.2 <i>Phase II: The Amendment Phase</i>	27
4.3.3 <i>Phase III: The Final Outcomes</i>	27
4.4 Explaining IG Influence.....	29
4.4.1 <i>IG Factors</i>	29
4.4.3 <i>Institutional Factors</i>	31

5. Discussion	33
5.1 Interpretation of the Results	33
5.2 Limitations	34
5.3 Implications.....	34
6. Conclusion.....	36
7. References: Primary Sources	37
8. References: Secondary Sources	39
Appendix A: The Selected Interest Groups.....	44
Appendix B: Key Features of the Proposal for an EU Nature Restoration Law.....	45
Appendix C: Key Changes to the Commission’s Proposal.....	46
Appendix D: Policy Issue I - Targets	50
Appendix E: Policy Issue II - Definitions	56
Appendix F: Policy Issue III: Implementation	61
Appendix G: Scores Total Preference Attainment per Phase.....	68
Appendix H: IG preferences Reflected in the Amendments.....	71
Appendix I: Documented Meetings Between IG and Key MEPs.....	74

List of Figures and Tables

Figure 1: Conceptual Model of IG Influence in the EP	13
Figure 2: The Legislative Process of the Nature Restoration Law within the EP.....	25
Table 1: Operationalization Variables	19
Table 2: Grouping IG by their preferences	22
Table 3: Preference Attainment Comparison Across Three Phases	27
Table 4: Economic Power IG	31
Table 5: Selected Interest Groups	44
Table 6: Key Changes to the Proposal	46
Table 7: Preferences Targets.....	50
Table 8: Preference Attainment Targets - Draft Report.....	53
Table 9: Preference Attainment Targets - Final Report.....	54
Table 10: Preference Attainment Targets - Final Outcome	55
Table 11: Preferences Definitions	56
Table 12: Preference Attainment Definitions - Draft Report	58
Table 13: Preference Attainment Definitions - Final Report	59
Table 14: Preference Attainment Definitions - Final Outcome.....	60
Table 15: Preferences Implementation.....	61
Table 16: Preference Attainment Implementation - Draft Report.....	65
Table 17: Preference Attainment Implementation - Final Report	66
Table 18: Preference Attainment Implementation - Final Outcome	67
Table 19: Total Preference Attainment - Draft Report	68
Table 20: Total Preference Attainment - Final Report	69
Table 21: Total Preference Attainment - Final Outcome.....	70
Table 22: Preferences Reflected in Amendments - Draft Report.....	71
Table 23: Preferences Reflected in Amendments - Final Report	72
Table 24: Preferences Reflected in Amendments - Final Outcome	73
Table 25: IG Providing Input to the Rapporteur for the Draft Report	74
Table 26: Meetings with Key MEPs ENVI and IG - Phase I.....	74
Table 27: Meetings with Key MEPs ENVI and IG - Phase II	75
Table 28: Meetings with Key MEPs ENVI and IG - Phase III	75
Table 29: Meetings with Key MEPs AGRI and IG - Phase I, II & III.....	76

List of Abbreviations

AGRI	Agriculture and Rural Development
BD	Birds Directive
CA	Compromise Amendments
CAP	Common Agricultural Policy
CEPI	Confederation of European Paper Industries
Cerame-Unie	European Ceramic Industry Association
CFP	Common Fisheries Policy
COGECA	European agri-cooperatives
COPA	European Farmers
EAA	European Anglers Alliance
EC	European Commission
EEB	European Environmental Bureau
EGD	European Green Deal
ELO	European Landowners' Organization
ENVI	Environment, Public Health and Food Safety
EP	European Parliament
EU	European Union
Euromines	European Association of Mining Industries, Metal Ores & Industrial Minerals
Europêche	Association of National Organisations of Fishing Enterprises in the European Union
EUSTAFOR	European State Forest Association
EXCA	European Expanded Clay Association
FIEC	European Construction Industry Federation
FTE	Full-time equivalent
HD	Habitats Directive
IG	Interest Groups
MEP	Members of the European Parliament
MSFD	Marine Strategy Framework Directive
NRL	Nature Restoration Law
PECH	Fisheries
Strategy	Biodiversity Strategy for 2030
TNCE	The Nature Conservancy Europe
UEPG	Aggregates Europe
WFD	Water Framework directive
WI-EA	Wetlands International - European Association
WWF EPO	WWF European Policy Office

1. Introduction

Biodiversity loss is one of the biggest environmental challenges we face nowadays. The urgency of this issue is reflected in its prominent position on the international agenda (Horizon, n.d.). In an attempt to halt biodiversity loss in the European Union (EU), the European Commission (EC) proposed a new regulation: the Nature Restoration Law (NRL) in June 2022 (European Commission, 2022). This proposal finds its roots in the EU Biodiversity Strategy for 2030 (Strategy) but aims to secure the commitments made under the Strategy by moving towards legally binding targets for the EU and its Member States (European Commission, 2020). Furthermore, with this proposal the EC recognizes that the biodiversity crisis and climate crisis are intrinsically linked by emphasizing that a strong restoration law is fundamental to make the EU climate-neutral by 2050 under the European Green Deal (EGD) (Cliquet et al., 2024).

However, the draft of the NRL has faced significant political pressure from various sides (Hering et al., 2023). This growing resistance is largely due to the activities of certain interest groups (IG), particularly those from the primary sectors (agriculture, forestry, and fisheries), who led a strong campaign against the proposal. After several voting rounds, narrowly surviving a rejection, a political compromise was reached and accepted by the European Parliament (EP) in February 2024. Following a postponed Council vote, due to the absence of a qualified majority, a last-minute position change from Austria paved the way for final approval on 17 June 2024.

Despite the relief over the EU's ability to pass a green bill (Guillot, 2024), the final text includes numerous requirements from IG, resulting in a diluted version of the EC's initial proposal. This raises questions about the influence exercised by IG after the proposal was presented to the EP, previously seen as an environmental champion (Dionigi, 2017). Yet, this reputation dates back to when the EP was mainly a consultative chamber (Rasmussen, 2015). Today, all kind of IG know how to find their way to the EP due to their increased legislative powers. This is however not reflected in IG influence literature that has focused predominantly on the EC as the main lobbying venue (Marshall, 2010). It is therefore time to gain a better understanding of what exactly determines IG influence within the context of the EP, addressing a research gap caused by the focus on the EC, rooted in the pre-Lisbon Treaty era.

Based on a single-case study, this research aims to examine under what conditions IG were able to shape the policy outcomes of the NRL throughout the EP's internal policy process. This is done by highlighting the contingent nature of IG influence and analyzing various contextual factors that foster or limit this influence. The analysis conducted for this research covers the legislative process from the moment that the EC tabled the proposal to the EP, until the EP reached its final position on the first reading. Corresponding to the overall goal of this paper, the research question is constituted as follows:

'How successful were interest groups in influencing the European Parliament's first reading on the Nature Restoration Law, and what factors contributed to, or limited their success?'

On an academic level, the answer to this question contributes to a better understanding of IG influence within the context of the EP, addressing the research gap in IG influence literature. This research illustrates that the institutional structure of the EP, and specifically the committee system, affects IG influence. Analyzing the complete internal policy process of the EP shows that the role of the rapporteur

holds significant power over the dossier, which can either favor or disadvantage the IG. Moreover, insights into IG influence in the EP extends the focus towards a more comprehensive understanding about the role and position of IG in decision making at EU level, which does not stop after the EC issues their proposal. Ultimately, this research proposes further investigation into the role of issue salience and public opinion and how that affects IG influence in this case. This can be achieved through a comparative case study analyzing EU climate policies, like the NRL.

On a societal level, it is interesting to see how IG influence has impacted a policy that aims to be beneficial to all European citizens by ensuring healthy ecosystems, necessary to clean our water, air and pollinate crops (European Commission, n.d.). The results show that a relatively small amount of private IG contributed to a significantly diluted version of the proposal and almost succeeded to reject the proposal completely. The insights provided by this research hopefully help citizens to better understand the power of IG and how they are able to shape environmental policies. Additionally, assessing the preferences and arguments used by the IG can help to get a better understanding of where the growing resistance to green policies around Europe comes from (Reuters, 2023), and what is desired by IG to create support for climate policy solutions in the future (De Bruycker & Colli, 2023).

After having introduced the research aim and underlying research question, this research is organized as follows. The next chapter introduces the concept of IG influence and its determinants, followed by an altered framework based on Dionigi's (2017) research. This framework highlights the contingent nature of IG influence and introduces several contextual factors for IG influence in the EP. Thereafter, the research design and methodology are explained, providing a justification of the chosen approach and the operationalization process. Subsequently, the different positions of 21 IG are analyzed. This is done along the lines of the EP policy process while taking into account the contextual factors of IG characteristics and the institutional structures of the EP. Lastly, the research discusses the findings, limitations, and implications, followed by a conclusion and recommendations.

2. Theoretical Framework

This chapter starts with a literature review on the topic of lobbying at the EU level, and specifically relevant for this research, lobbying in the EP. Furthermore the concept of IG influence is introduced. Finally, a conceptual model and three hypotheses are established to test whether the theory holds in the case of the NRL.

2.1 Literature Review

IG influence at the EU level is a largely researched topic. Yet, it is characterized by a multitude of hypotheses and contradictory findings (Klüver, 2011). Furthermore, the vast majority of literature on IG influence is focused on the EC (Dionigi, 2017). Hence, the following section aims to stipulate some differences between the institutions and how this relates to IG influence. Finally, various determinants of IG influence are introduced to develop a conceptual framework based on these factors

2.1.1 *Lobbying the European Institutions*

As a result of European Integration, interest representation at the EU level has evolved into an important mechanism within the EU's political system (Dialer & Richter, 2019; Greenwood, 2019). These representation efforts are facilitated by organized entities known in this research as 'interest groups' (IG), a term defined by the European Council (2013) as the full spectrum of actors who carry out activities to influence policy-making. Additionally, they do this as private actors and do not compete for electoral mandate.

The activities of IG serve multiple goals that can be explained as twofold. First, it is a way for citizens to express their opinions to decision makers and, preferably, to influence their political decisions (Dür & De Bièvre, 2007; Klüver, 2011). Taken from this perspective, the activities of IG can improve EU decision-making processes by supporting policies that align with the citizen interests and avoid policies that solely represent the interests of elites (Dür & De Bièvre, 2007). Second, IG are also of important value for European institutions who seek for actors to support their policy goals or assist them in furthering the course of European integration (Klüver et al., 2015; Greenwood, 2019). Additionally, institutions depend on IG to provide technical and political information that they cannot gather through their own resources (Greenwood, 2019).

Existing literature on IG influence in the EU focuses on various dimensions of IG activities and their impact on the EU policymaking process. Some key areas of focus include, IG' use of strategies and tactics to influence policy making (Beyers, 2004; Hanegraaff, 2015), questions about democracy and accountability assessing the influence of IG on democratic governance within the EU (Dür & De Bièvre, 2007; Eising, 2008; Michalowitz, 2004), and IG' access to EU institutions and policymakers (Hermansson, 2015; Ibenskas & Bunea, 2021; Marshall, 2010). The latter is seen as particularly important as researchers predominantly use the level of access to policymakers as a proxy for influence (Dionigi, 2017). This is done by assessing the factors that enable certain IG to gain privileged access and exert influence over policy decisions (Dionigi, 2017).

Looking at the different EU institutions, the EC and the EP are the most important venues for IG in Brussels as lobbying the Council mainly takes place in the Member States (Dionigi, 2017). Given the role of the EC in initiating and formulating policies, the stakes are high for IG early in the policy phase to ensure that their preferences are included in the proposal (Hix & Høyland, 2022). These dynamics are different in the EP, where IG are busy shaping the proposal by suggesting amendments and voting behavior trying to sway the legislation in their preferred direction (Dionigi, 2019). Moreover, the EP is the institution that is most visibly shaped by party politics as Members of the EP (MEPs) are organized based on shared ideologies (Marshall, 2015). At the EC party politics also play a role, but less visible and more focused towards the national parties (Klüver et al., 2015). As a result of these party groups and their visible ideological differences, IG are able to carefully select MEPs who align with their views (Klüver et al., 2015; Marshall, 2015). Conversely, MEPs are more likely to engage with IG that are instrumental for achieving their votes, policy and office-seeking goals (Ibenskas & Bunea, 2021). Furthermore, the EP is structured by its committee system. This is where the bulk of parliamentary work is done (Klüver et al., 2015). Because of the limited time and staff resources to deal with the policy issues, committee members often seek out to IG to supply them with information (Hix & Høyland, 2022). At the same time, IG have good knowledge which MEPs are most influential when scrutinizing legislation (Hix & Høyland, 2022). Especially the rapporteurs make a good target for IG as they are in the position to prepare a draft the legislative reports and thereby heavily rely on IG for their information (Dionigi, 2019; Marshall, 2012). With regards to IG influence and a potential research gap, an enhanced comprehension of the institutional structure of the EP serves to elucidate potential unexpected outcomes vis-à-vis theoretical expectations stemming from research conducted within the context of the EC.

2.1.3 Interest Group Influence

By examining a number of key factors it is possible to explain what makes certain IG more successful in shaping policy outcomes than others (Bunea, 2013; Klüver, 2011, 2012). The key factors that affect the ability of IG to shape policy outcomes are related to three determinants: (1) IG characteristics, (2) institutional structures, and (3) issue factors.

The first determinant is concerned with IG characteristics and according to Dür and De Bièvre (2007), it is expected that IG with more resources should have more influence than IG with little resources. Following the definition of Dahl (1961 in Dür & De Bièvre, 2007), resources can be defined as ‘anything that can be used to sway the specific choices or the strategies of another individual’. Generally, there are different types of resources which one can distinguish in financial means, legitimacy and representativeness, knowledge, and expertise and information (Dür & Mateo, 2014). Next, IG influence may also vary according to the type of actor. In IG literature, private (concentrated) interests are generally assumed to have a higher potential to influence policy outcomes compared with public (diffuse) interests because of three key factors (Dionigi, 2017). First, according to the theory of ‘collection action’ (Olson, 1965), it is expected that concentrated groups tend to be better organized while diffuse interests often remain unorganized, as there are no rewards associated with active group participation (Dionigi, 2017). Second, it is argued that IG who represent private interests hold technical information that is often of great interest to policymakers

(Rasmussen, 2015). Third, private groups play a key role in the performance of the economy (Lindblom, 1977 in Dionigi, 2017).

The second determinant is the institutional structure of the political system. Regarding the EU, it is important to take into account the different structures of the venues where lobbying takes place (Klüver et al., 2015). Institutions may empower or disenfranchise specific interests due to their structure and role in the legislative process determining the balance of interests (Dür & De Bièvre, 2007). Despite the EC's attempts to create a pluralist system with checks and balances, IG literature often finds that open access to government could lead to heavy lobbying of public officials by private interests (Greenwood, 2019; Hix & Høyland, 2022). Also, the EP, long known as being particularly open to public interests now appears to reinforce the advantage that private groups hold (Rasmussen, 2012a). This can be explained by the increase of legislative work that the EP is facing, allowing more input from IG (Dionigi, 2019) or re-election and policy-seeking/career-progression logics (Ibenskas & Bunea, 2021).

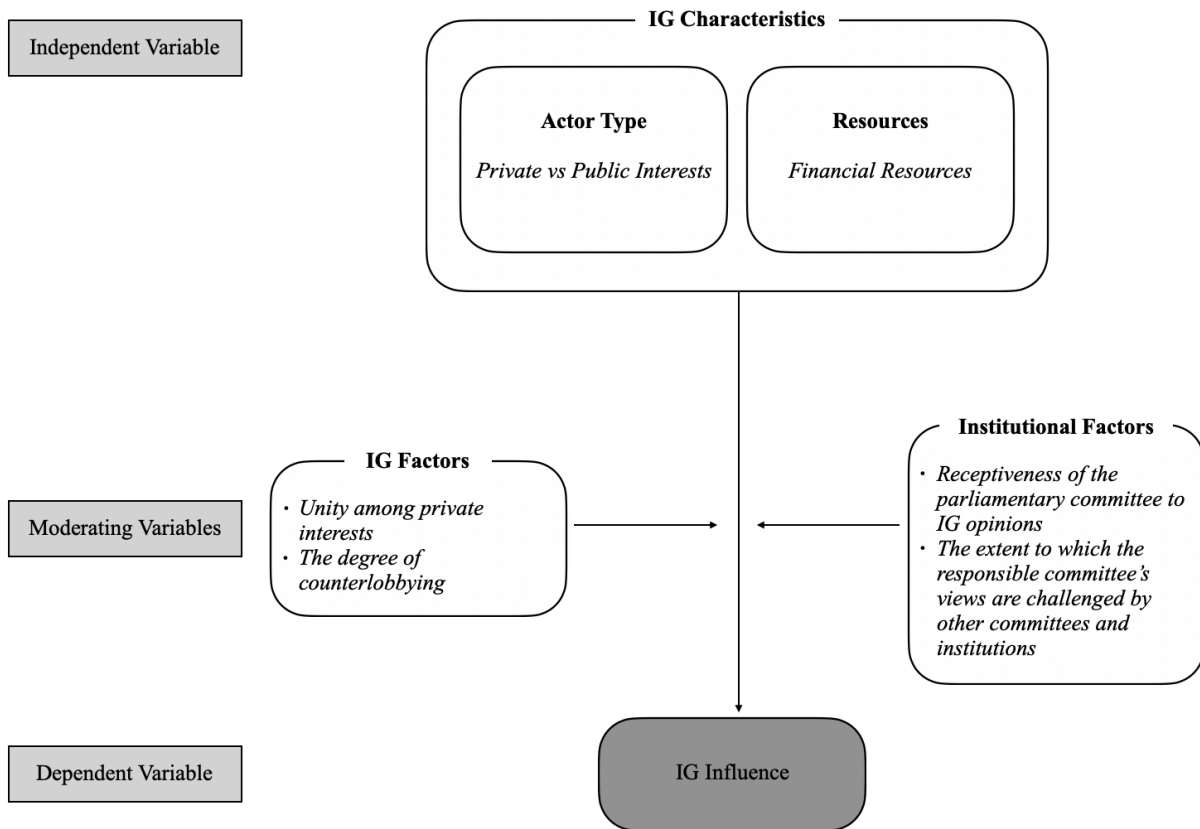
The third determinant is the characteristics of the issue. The policy type seriously affects IG influence according to the likelihood of the existence of counterlobbies (Lowi, 1964 in Dür & De Bièvre, 2007). Opposing groups are most likely with regulatory policies, while distributive policies promote coalition enhancing the influence that IG can exert on the policy outcomes. In the case of redistributive policies IG influence is expected to be the lowest (Dür & De Bièvre, 2007). Most legislative proposals in the EU concern market regulation, which is frequently opposed by private interests (Dür et al., 2015). This means that private interests often have to focus on limiting the size of its losses compared to the status quo, while public interests are often more supportive of the EC's policy proposals (Dür et al., 2015). Next, IG influence also depends on the saliency of the issue. This can be explained as, the more attention that public and media attach to the issue, the harder it becomes for IG to influence the outcomes (Dionigi, 2017). Moreover, research from Dür et al. (2015) show that especially private interests lose their potential for influence in cases of high issues saliency. Lastly, the technicality, or complexity of a case may also explain variation in influence across issues (Dür & De Bièvre, 2007). As the level of technicality of the issue increases, decision-makers' need for input increases as well, leading towards higher chances of IG influence if they possess over this information (Dür & De Bièvre, 2007).

2.2 Conceptual Framework

An adjusted conceptual framework (see Figure 1) is established to address the overarching research question. The model, based on key factors for IG influence, treats IG characteristics as the independent variable affecting the dependent variable: IG influence. Responding to recent literature that emphasizes the contingent nature of IG influence, the model adds several moderating variables coming from Dionigi (2017). These variables refer to IG and institutional contextual factors and how this affects the relation between the independent and dependent variable. The conceptual model does not consider the effect of issue-related factors. This is because this research is designed as a single-case study (see [methodology](#)) which does not allow to measure this determinant of IG influence (Klüver, 2011). In addition, based on the relations indicated in the conceptual model, three hypotheses are established that will be tested in the remainder of this research.

Figure 1

Conceptual Model of IG Influence in the EP



Note. Adjusted from Dionigi (2017)

2.2.1 Defining Interest Group Influence

To determine why some IG are able to successfully influence political decisions while others are not, it is important to define IG influence. According to Dür (2008), influence can be described as ‘an actor’s ability to shape a decision in line with his/her preferences’. Michalowitz (2007) provides a similar definition, but emphasizes that other factors beyond lobbying efforts might also contribute to the same outcome. It is thus important to realize that there is a difference between deliberately influencing policy outcomes and something as luck (De Bruycker & Beyers, 2019). Hence, IG influence is about a causal relation between the activities of IG and achieving their goals in policy outcomes. Therefore, this research defines ‘IG influence’ as the ability of IG to achieve their preferences in the final policy outcomes (Dür & De Bièvre, 2007; Stevens & De Bruycker, 2020).

2.2.2 Interest Group Factors

The literature review explains that based on actor type it is expected that private interests have a higher chance to influence policy outcomes. However, the empirical evidence that supports these claims remains inconclusive (Klüver, 2011). This disagreement is partially because of the different conceptualizations of IG influence in combination with the methods that aim to capture the concept (Dür, 2008; Stevens & De Bruycker, 2020). Another possible explanation, as emphasized by Dionigi (2017), highlights the importance of examining the context of key factors. Dionigi explains that there is a difference between the high potential for influence that private interests hold and their actual influence (Dionigi, 2017). The ability of private IG to translate this potential into influence depends on various contextual factors: business unity and the degree of counterlobbying (Dionigi, 2017). First, business unity refers to the private interests and relates to the expectation in IG literature that unity among these actors conveys influence (Dür et al., 2015). So, a conflict between different private interests might explain an observed lack of their success. Second, is the degree of counterlobbying. When there is a high level of counterlobbying, the MEPs exposure to diverse frames increases and their interpretation of the issue becomes more complex, making it hard for IG to gain enough support (Dionigi, 2017).

Next are the resources of IG. As previously mentioned there are various types of resources (Dür & Mateo, 2014). This research looks at the financial resources IG hold as this type of resources are typically associated with a wealth of expert information and political capabilities (Flöthe, 2019). Moreover, it is interesting to test whether money translates directly into IG influence, or that a more nuanced explanation is needed. Based on the above information the following hypotheses can be formulated.

H1: IG that represent private interest have a higher chance of securing their preferences in the agreed text by the EP if there is a unity among private interests and they are faced with limited, or no, lobbying opposition

H2: IG that hold more financial resources have a higher chance of securing their preferences in the agreed text by the EP than IG who hold less financial resources.

2.2.3 Institutional Factors

As previously mentioned in the literature review, the real scrutiny of EU legislation takes place in the committees (Dionigi, 2019; Hix & Høyland, 2022). And while all MEPs can seek to influence a dossier under scrutiny, the greatest influence is wielded by a core group of particularly influential MEPs (key MEPs) that are part of the committee: (1) the rapporteur, (2) the shadow rapporteurs, and (3) the group whips (Dionigi, 2019). Next to the key MEPs, IG are also aware of the decision-making procedures that provides them with three entry points to influence the committee members: the draft report phase, the amendment phase, and the debating and voting phase (Marshall, 2010). Together, the key MEPs and three entry points make ideal pressure points for IG.

A possible explanation for IG influence within the institutional structure of the EP can be derived by looking at the IG who make use of these pressure points. However, the explanatory power of these pressure

points largely depends on their contextual factors: the receptiveness of the responsible committee to the views of IG, and the degree to which their views are challenged internally (by the opinion-giving committees) and externally (by the Council) (Dionigi, 2017). First, committees are often biased towards their policy priorities (Gilligan & Krehbiel, 1997). Take for example ENVI, who often prioritizes environmental issues over industry concerns (Rasmussen, 2015). Therefore, receptiveness means whether there is a match between the views of the responsible committee and the interests represented by IG. Receptiveness to the views of IG is thus not the same as influence, but, as a contextual factor, it is able to strengthen or weaken the ability of IG to influence policy outcomes. However, whether this bias eventually results in a biased policy outcome depends on how close cooperation is with other opinion-giving committees and the Council (Dionigi, 2017). This cooperation challenges the responsible committee to moderate their demands, and consequently, the demands of the IG that align with their views. Based on the above information the last hypothesis is formulated as follows:

H3: IG have a higher chance of securing their interests in the agreed text by the EP if the responsible committee is receptive to its views and there is minimal cooperation with other committees and/or institutions

3. Methodological Framework

This chapter outlines the research approach for measuring IG influence, reflecting on its strengths and potential pitfalls. It justifies case and sample selection decisions, details the operationalization and data collection process, and concludes with a discussion on the validity and reliability of the methodological framework.

3.1 Research Design

This research represents a single case study on the legislative process of the NRL in the EP. Case studies are known for their intensive analysis of an individual unit with the aim to gain a comprehensive understanding of the phenomenon at stake (Voltolini, 2017). However, case study designs also entail certain weaknesses, notably their limited external validity and susceptibility to researcher bias during data collection or interpretation (Flyvbjerg, 2011). It is therefore crucial to provide motivation and transparency regarding the decisions made within the methodology.

3.2 Research Method

Generally there are three different methods to measure the influence of IG: process tracing, assessing attributed influence and gauging the degree of preference attainment (Dür, 2008). This research takes process tracing with elements of the preference attainment method to examine IG influence. Combining these two methods helps to build a coherent justification for findings by means of triangulation, which strengthens reliability as well as internal validity (Creswell & Creswell, 2022). Ultimately these methods contribute to a comprehensive analysis of the research problem and help to explain the outcomes based on the theory described in the previous chapter.

3.2.1 Process Tracing and Preference Attainment

Process tracing is the most frequently used method to measure IG influence in the EU (Dür, 2008). Despite a growing trend towards large-N studies and quantitative methods for law-like generalizations (Voltolini, 2017), it remains the preferred method for understanding the dynamics that affect IG influence. This is also the reason that this method is selected for this research, as we aim to show how contextual factors affect IG influence.

The process under analysis consists of the three phases that serve as entry points for IG. During each phase both primary and secondary sources are analyzed to uncover the various factors leading to a specific policy outcome (Rasmussen, 2012b). The strength of process tracing is that it allows to uncover the steps by which causes affect outcomes (Dür, 2008; Orach et al., 2017). However, the method also has some weaknesses such as being highly susceptible for subjective interpretations of the researcher (Dür, 2008). Moreover, process tracing heavily relies on semi-structured interviews, something that is not feasible for this research due to time constraints and the lack of access to relevant stakeholders.

To overcome this gap in data collection, this research also uses preference attainment to measure IG influence. Whereas process tracing aims to uncover the factors that lead to a certain outcome, preference attainment is able to capture aspects of influence that are not easily observable (Rasmussen, 2012b). To execute preference attainment in this research, the initial stances of IG on the policy issues are defined based on their expressions in position papers. These positions are subsequently compared with the policy outcomes of the three phases of the EP's first reading to assess whether the preference of the IG are attained or not.

Overall, combining process tracing with preference attainment to measure IG influence has some serious advantages as it aims to validate the findings by means of triangulation (Dür, 2008). Nevertheless, the inability to conduct semi-structured interviews still leaves a considerable gap in data collection and can only partially be met by preference attainment approaches. This limitation is taken into account and any uncertainties about inferences will be mentioned in the discussion of this research. Additionally, the reason not to include the third approach, the 'attributed influence' method, is because this is usually measured by ways of surveys, something that is not feasible within the boundaries of this research.

3.3 Case Selection

Case selection is often seen as an issue of criticism as there exists no shared rules on how to select cases (Voltolini, 2017). Therefore, transparency and justification are crucial in selecting a case. The NRL is in the first place selected because it is a unique case in itself. The NRL is the first continent-wide, comprehensive law of its kind, reflecting a high ambition level of the EC (European Commission, n.d.). Moreover, the controversies in the proposal caused for serious commotion in the EP and among IG, making this one of the EGD's most controversial files (Manzanaro, 2024). This uniqueness of the proposal in combination with the growing tension allows to explore the dynamics between the EP and IG when being under pressure and how this eventually affects IG influence.

A methodological justification is that the NRL can be considered a deviant case. A deviant case is characterized by representing outcomes that diverge from the typical or expected pattern (Seawright & Gerring, 2008). The text, accepted by the EP, diluted the environmental ambition of the EC's proposal which starkly contrast their reputation of being the defender of the diffuse 'green interests' (Rasmussen, 2015). Hence, this case full of unexpected turns makes the NRL particularly interesting for studying the conditions under which IG were able to achieve their preferred outcomes.

3.4 IG Selection

The sample for this research includes IG who are actively involved in the legislative process of the NRL after the EC tabled the proposal to the EP (June 2022) to the first reading's final agreement (February 2024). Due to time constraints and limited access to resources, it is not possible to examine the role of all IG that have been active on this dossier. Therefore, the sample of IG is determined by a purposive sampling approach as this increases the chances that the sample is representative for the case (Seawright & Gerring, 2008). However, as most sample selection approaches are geared towards the EC and refer to the contribution of IG during the consultation, we had to try various ways to make sure that the sample was representative. The initial attempt to select IG based on documented meetings with MEPs failed to provide

sufficient and representative data. Therefore, the selection criteria now rely on the availability of position papers and media coverage.

Regarding the position papers, only the initiators of the position paper are taken into account to make sure that only those who really contributed to the creation of the document are selected. When this is not specified, all IG that have signed the paper are selected. This can be considered a limitation as this increases the risk of misallocating certain outcomes to IG that have not put as much effort in the activities as the initiators of the position papers. The sample that emerged based on this first criterion turned out to be missing two important groups. Based on media coverage, the agricultural and fishing industry have played a dominant role on the dossier (Guillot, 2023). Subsequently, Copa & Cogeca and Europêche were added to the sample. Additionally, only IG that are registered in the Transparency Register are selected. The reason for this is because both the EC as the EP have registration as a requirement for conjuring meetings (Hix & Høyland, 2022). Additionally, it requires organizations to disclose information that is considered valuable data for this research.

The complete sample of 21 selected IG can be found in [Appendix A](#). To avoid ambiguities, note that both the EEA and ELO are classified as NGOs while representing private interests. However, looking at their position papers, the EEA supports a coalition of NGOs and thus defends public interests in this case, while the ELO defends agricultural interests and therefore private interests.

3.5 Operationalization and Data Collection

The independent variable consists of two elements, actor type and resources. To examine the actor type, private versus public interests are compared. This information can be found in the Transparency Register under the indicators ‘Promotes their own interests or the collective interests of their members’ (private) or ‘Does not represent commercial interests’ (public). Subsequently, the resources are operationalized based on financial resources as these are easier to quantify (Dür & Mateo, 2014). However, as the total budget spend on lobbying activities is not available for all IG, this research takes the FTEs to measure this variable, following the operationalization from Klüver (2012). However, this can be considered a limitation as FTEs do not one-on-one reflect the financial resources of an IG.

The moderating variables, are operationalized as follows. First, unity among private interests is examined by comparing the preferences of the private IG to see if they share the same preferences on the policy issues. Second, the degree of counterlobbying, looks at the variety of preferences presented by all IG to analyze till what extent these preferences create conflicting frames and thereby counteract each other's potential influence. To assess the committee's receptiveness, we refer to the MEP database to identify which IG secured formal meetings with key MEPs, assuming that receptiveness influences the creation of these meetings. However, access is a very complex concept that is not only dependent on receptiveness of the MEPs towards the IG. But taken the available resources for this research, the MEP database comes closest to capturing this variable, while acknowledging its limitations. Furthermore, the extent to which these views are challenged is defined by the following: (1) there is a close cooperation between the responsible committee and the opinion-giving committees if there is an enhanced cooperation procedure enforced (Rules 57 -58 in the EP's Rules of Procedure 2023), (2) close cooperation with the Council occurs within the framework of the ordinary legislative procedure (Dionigi, 2017).

The dependent variable, IG influence is measured based on tracing key changes MEPs introduce to the EC's proposal throughout the EP's internal policy process and compare this to the preferences of the IG (Dionigi, 2017). These preferences are defined by looking at their position papers. Operationalization is done according to the method of Mahoney (2007). A complete oversight of the operationalization and data collection is depicted in Table 1.

Table 1

Operationalization Variables

Variable	Indicator	Value	Data
IG Influence	Preference attained throughout the process	0-did not attain objective at all; 1-attained some portion of their objective; and 2-fully attained objective	Position papers, draft report, final report, and final position EP
IG Characteristics: Actor Type	IG representing public or private interests	Public/private	Transparency Register
IG Characteristics: Resources	Financial Resources	FTE used for lobbying activities	Transparency Register
IG Factors: Unity among private interests	Alignment between IG that represent private interests	Private IG share their opinions on the policy issues (yes/to some extent/no)	Position papers
IG Factors: The degree of counter lobbying	Amount of IG that are active on the dossier	The variety of frames that are presented to MEPs (low/medium/high)	Position papers
Institutional factors: Receptiveness of the responsible committee	Receptiveness	Contact moments between key MEPs and IG	MEP meeting database, meeting documents
Institutional factors: Extent to which the responsible committee's views are challenged by other committees and institutions	Cooperation with committees and/or Council	Close cooperation with opinion-giving committees (Rule 57-58, EP Rules of Procedure); with the Council (Ordinary Legislative Procedure)	EU official documents

3.6 Validity and Reliability

Single case studies are known for their high internal validity (Creswell & Creswell, 2022), which this research aims to enhance through process tracing. This method uncovers factors contributing to outcomes, reducing susceptibility to the correlation-causation fallacy common in statistical analyses (Voltolini, 2017). Furthermore, the decision to combine two methods of data analysis in this research enhances both internal validity and reliability. By means of triangulation, two types of analyses are conducted contributing to a coherent justification of the findings (Tracy, 2010). Consistency is further ensured through transparency about research methods, data collection, and challenges.

What is considered to be a more serious problem with case studies is its weak external validity (i.e. generalizability). However, the desirability to generalize the findings of a case study depends on the research aim and the case that is being studied (Flyvbjerg, 2006). Concerning this research, the NRL resembles a deviant case known for its surprising values. This selection rationale serves the goal to refine theoretical expectations and thereby eventually increase their predictive value of findings (Molnar, 1967). Moreover, a deviant case probes for new explanations which with our approach using contextual variables for enhanced explanatory power (Tracy, 2010). Hence, the aim of this research is therefore rather to obtain a better and deeper understanding of the studied case than the generalizability of its findings, corresponding to what Green and Caracelli (1997) call focussing on particularity rather than generalizability.

4. Results and Analysis

This chapter analyzes the proposal's evolution and its alignment with IG positions. Prior to delving into the analysis, it introduces the proposal, the policy issues (i.e. controversial items of the proposal), and the different positions of the IG. Subsequently, the influence of the IG is examined by means of process tracing and preference attainment during the three phases of the legislative process in the EP. Finally, the results allow us to develop a position on the three hypotheses established for this research.

4.1 The Proposal

The aim of the NRL is threefold: (1) the continuous, long-term and sustained recovery of nature through the restoration of ecosystems, (2) achieving the EU's objectives on climate mitigation and adaptation, and (3) meeting international commitments (Article 1(1)). To achieve this, the proposal puts forward an overall target for all Member States that says that nature restoration measures should cover at least 20 % of the EU's land and sea areas by 2030, and all ecosystems in need of restoration by 2050 (Article 1(2)). Chapter two outlines restoration obligations for habitat types listed in Annex I (Article 4) and Annex II (Article 5) of the Habitat Directive (HD) and Birds Directive (BD), as well as for specific ecosystems (Articles 6-10) (Cliquet et al., 2024). To implement the proposed regulation, Member States would be required to develop a National Restoration Plan (NRP), to be assessed by the EC. A more detailed overview on the key aspects of the proposal can be found in [Appendix B](#).

Regarding the IG, the proposal for the NRL created a division resulting in two groups: one looking for ways to weaken the proposal's tangible impact, while the other demanded to increase its ambition or at least maintain its original form of the proposal. These opposing positions are also reflected in the position papers of the IG. Given their opinions on certain elements of the proposal it is possible to divide them into two groups, which can be found in Table 2.

Table 2*Grouping IG by their Preferences*

	Type	IG	Coalition/Individual IG
Private: Industry	Agriculture and Fisheries	Copa & Cogeca, Europêche	Coalition (3 IG)
	Agriculture	ELO	Individual
	Non-Energy Extractive	UEPG, Cerame-Unie, Euro Gypsum, Euromines, EXCA	Coalition (5 IG)
	Construction	FIEC	Coalition (6 IG)
	Paper	CEPI	Individual
	Forestry	Eustafor	Individual
	Electricity	Eurelectric	Individual
Public: NGO	Environmental	BirdLife Europe, ClientEarth, EEB, WWF EPO	Coalition (4 IG)
	Marine	Seas at Risk	Coalition (26 IG)
	Living Rivers Europe Coalition	EEA, EEB, TNCE, WI-EA, WWF EPO	Coalition (6 IG)

4.2 The Policy Issues

After the EC formulates the proposal, the EP shapes the proposal by addressing its most controversial elements (Hix & Høyland, 2022). These controversial parts, defined as policy issues (Hart & Kleiboer, 1995), are typically the focus of debate and can MEPs suggest changes to resolve these controversies. By analyzing the position papers and assessing which parts of the proposal are most frequently mentioned, the following policy issues are identified: targets, definitions, and implementation. Divided along the lines of these (sub)-issues it is possible to illustrate the line of preferences that the IG have on the issues. Moreover, these preferences form the basis for analyzing IG' ability to secure them in final policy outcomes. For a more detailed overview of the positions of all IG on the policy issues see [Appendix D](#), [E](#) and [F](#).

4.2.1 Policy Issue I: Targets

The first policy issue is about the targets and their specifications. The proposal includes quantitative, binding targets for 2030, 2040, and 2050. However, the IG hold different opinions on how to quantify these targets and their level of ambition. The sub-issues are called a) type of targets and b) target coverage.

The primary concern regarding the type of targets is how the targets are determined. Particularly private IG propose to use case-by-case assessments to define the targets rather than using the predetermined targets. This is to make sure that local stakeholders are included with defining the restoration measures. Furthermore, some IG question the sources where these targets are based on and want to see that the EC

provides robust data and the indicators used to establish these targets (Eustafor, 2023; ELO, 2022; CEPI, 2022). The proposal justifies these targets scientifically, primarily relying on scientific models of nature's state. Some IG want to see targets based on recent measurements, suggesting the use of indicative or qualitative targets instead. Lastly, there are the legal duties associated with meeting the targets. The proposal is a regulation, making the targets legally binding soon after it is agreed upon by the EU legislative bodies (European Union, n.d.b). According to the NGOs, opting for a regulation is deemed a smart decision given the time urgency associated with nature restoration (EEA, 2022; WWF, 2022; Seas at risk, 2022). However, not all IG agree with this legal act and demand for options that grant more national flexibilities and exemptions (FIEC, 2023; Euromines, 2023).

The second sub-issue concerns target coverage in terms of the level of percentage and the specific ecosystem types and areas being targeted. First, for the annex-related habitat types the aim is to restore 90% by 2050. The NGOs demand that this needs to be increased to a 100% restoration (WWF, 2022). They also advocate for increasing all target levels across milestones for timely, effective results. On the contrary, private IG argue that these targets are not realistic and do not want an increase towards a 100% target in 2050.

4.2.2 Policy Issue II: Definitions

The second policy issue concerns the 15 definitions outlined in Article 3. The line of preferences clearly show the differences between the NGOs and private IG. The NGOs predominantly demand specifications of certain clauses to make sure that there is less room for legal loopholes, while the private IG wants to see the definitions supplemented with exemptions to meet the targets. Overall, the suggestions for this policy issues are very specific and vary per IG. Hence, an overview of all suggestions made by the IG to further specify or remove parts of the definitions can be found in [Appendix E](#).

4.2.3 Policy Issue III: Implementation

The third policy issue addressed in this research concerns the implementation of the NRL. The sub-issues identified pertain to the mechanisms employed for implementation: a) policy coherence, b) the NRPs, and c) financing.

First, regarding policy coherence, the EC refers to existing EU environmental legislation and strategies to show how this proposal complements current policies. However, the position papers reveal how IG use inconsistencies between existing legislation and the proposal to create competing frames. On one hand, NGOs advocate for improved policy coherence to enhance the effectiveness of EU environmental policies by expanding the scope and including more international agreements as well. Moreover, they want to see exemptions in the NRL that come from other existing regulations to be removed so that the NRL becomes a stricter leading regulation (WWF, 2022). Lastly, they point out the difference between the targets proposed in the NRL (20% nature restoration for 2030) and the Strategy (30% nature protection for 2030) and want to see the targets increased so that it matches the Strategy (Wetlands, 2022). Conversely, the private IG wants to see the target of the NRL remain at 20%, while at the same time they are looking for possible

exemptions in existing regulations to make sure that those remain the leading regulations instead of a new stricter NRL. This strategy indicates a cherry-picking approach for private IG.

Second, the NRPs, proposed to conduct preparatory research for identifying necessary restoration measures, are subject to critique from IG as well. First, almost all IG wants to see how public participation is ensured in the preparation of the NRP. Furthermore, the proposal does not elaborate how wider societal targets and possible social and economic targets are safeguarded in the NRP (CEPI, 2022; ELO, 2023; Eustafor, 2023). For this reason, CEPI (2022) emphasizes the importance of a holistic approach to make sure that not only the status of ecosystems are taken into account. Lastly, it is expected that the NRPs are adopted in 2027, leaving three years to deliver on the 2030 targets. The NGOs call for a shorter timeframe to adopt the NRPs to ensure timely action (Wetlands, 2022; WWF, 2022; Seas at Risk, 2022).

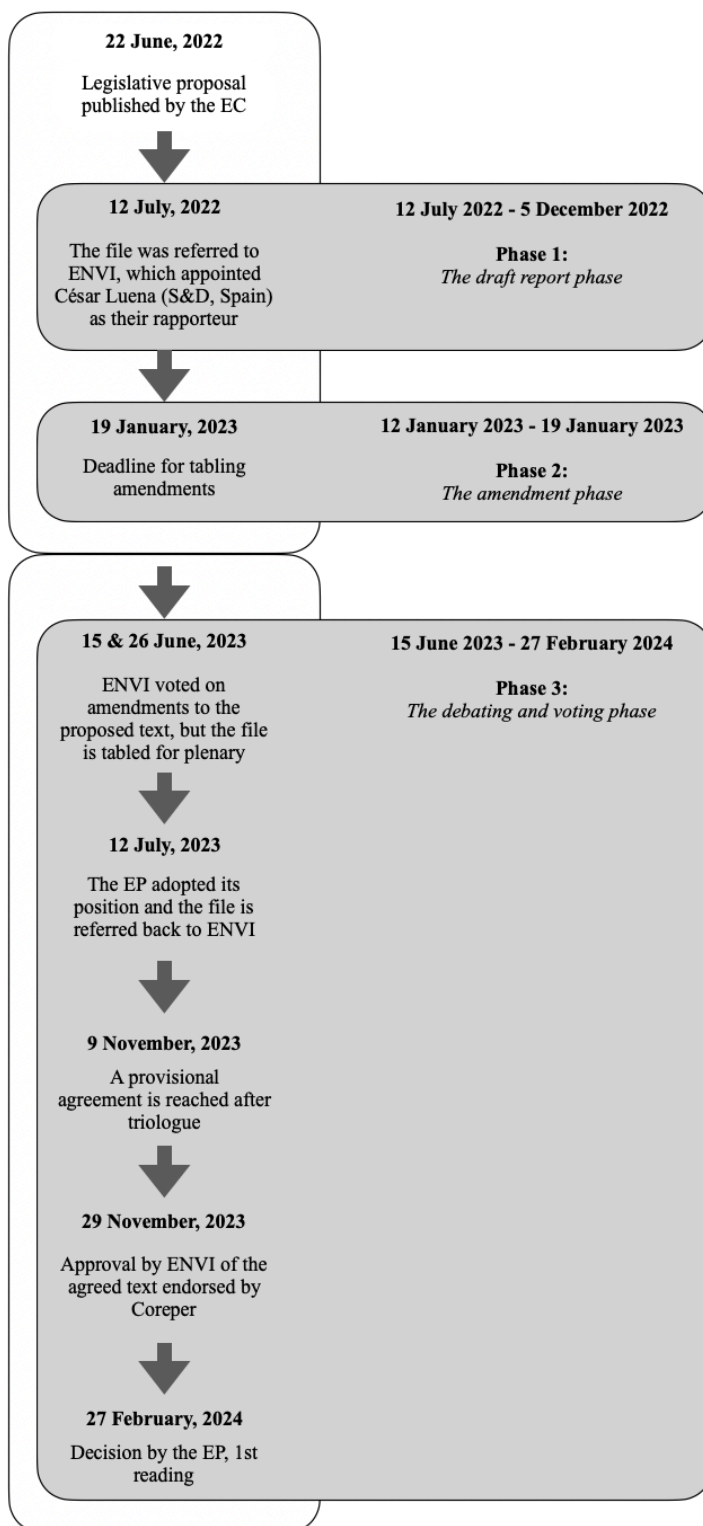
The last sub-issue is the financial feasibility. Despite the legislative financial statement included in the proposal, both NGOs and the private IG, have expressed their concerns about potential financial barriers during the implementation phase. Effective and successful implementation is expected to cost a lot of money needed to compensate for land, cover the expenses that are needed for drafting the NRP and monitoring and reporting activities (Hering et al., 2023). However, the availability of EU funding is limited and the proposal assumes that a large part of the potential loss in revenues generated in areas in need of restoration can be met by funds that stem from the Common Fisheries Policy (CFP) and the Common Agricultural Policy (CAP) (Cliquet et al., 2024). However, the NRL lacks support from these industries and therefore risks serious shortcomings when it comes to resources needed to implement the proposal successfully.

4.3 The Policy Process

This section analyses what happened throughout the EP's internal policy process. An overview of the complete timeline and three phases can be found in Figure 2. For each phase, the adopted amendments are examined and compared to the initial preferences of the IG on the policy issues. The results for the total preference attainment for all IG during the three phases are presented in Table 3 (see [Appendix G](#) for the scores behind the percentages). The coalition of Copa & Cogeca and Europêche is excluded from scoring because their only position was to reject the entire proposal, which makes it unable to score them on the specific sub-issues.

Figure 2

The Legislative Process of the Nature Restoration Law within the EP



Note. Adapted from Legislative Train Schedule, 2024; Legislative Observatory, n.d.

4.3.1 Phase I: The Rapporteur's Draft Report

The EC put forward the proposal to ENVI in July 2022, who appointed César Luena (S&D, Spain), as their rapporteur (Legislative Train Schedule, 2024). Initially the Committee on Fisheries (PECH) and the Committee on Agriculture and Rural Development (AGRI) were appointed as opinion-giving committees. However, after requesting an associated committee status, they received this status under Rule 57.(European Parliament, 2022a; European Parliament, 2022b). Under Rule 57, committees are granted more competences, including the requirement for the responsible committee to accept all amendments from an associated committee without a vote if they concern matters within the exclusive competence of the associated committee (EPRS, 2020).

Initially the proposal received particularly positive reactions (Cliquet et al., 2024). However, from the beginning of 2023 sounds of criticism arose, predominantly from the private industries (Decler & Cliquet, 2023; Cliquet et al., 2024). Looking at the timeline, this sudden upheaval starts around the moment the rapporteur presented his draft report on the proposal 12 January 2023 (European Parliament, 2023a). The rapporteur is in the position to be the first to propose amendments during the draft report phase (Dionigi, 2019). Due to limited preparation time and lack of detailed expertise, rapporteurs rely heavily on input from various IG while drafting these amendments (Rasmussen, 2012a).

The draft report counts 118 pages in which the rapporteur proposed 183 amendments to the EC's proposal (European Parliament, 2022c). An overview of what these amendments entail for the policy issues can be found in [Appendix C](#). In the explanatory statement at the end of the document, Luena makes clear that he supports the legally binding targets (European Parliament, 2022c, p.114). Moreover, he proposes to increase the percentages in the timeframes for all ecosystems and aims for 100% restoration for terrestrial and marine ecosystems, similar to the preferences indicated in the position papers of the NGOs (European Parliament, 2022c). Luena also proposed several amendments that improves the policy coherence by filling the gaps that have caused weak implementation of the HD and BD in this proposal. Furthermore, he proposes an article addressing the future need for a dedicated permanent financial instrument for restoration. Lastly, he acknowledges that the support of public and relevant stakeholders for the foreseen restoration measures is crucial to ensure the successful implementation, and proposes to create a specific article on public participation, access to public information and public awareness. [Appendix H](#) illustrates the alignment between proposed amendments and the preferences of all IG, revealing significant correspondence between the amendments and the preferences of the NGOs. This resulted is also reflected in the high scores for the NGOs in the total preference attainment at this stage (Table 3). Additionally, the draft report concludes with a list of entities or persons from whom the rapporteur has received input (see [Appendix I](#)). This list includes six of the selected IG of which five are NGOs.

Table 3*Preference Attainment Comparison Across Three Phases*

	IG	Phase I	Phase II	Phase III
Industry (private interests)	Copa & Cogeca, Europêche	-	-	-
	ELO	8,33%	75%	33,3%
	UEPG, Cerame-Unie, Euro Gypsum, Euromines, EXCA	50%	50%	25%
	FIEC	0%	60%	40%
	CEPI	14,3%	100%	71,4%
	Eustafor	36,4%	100%	54,5%
	Eurelectric	0%	77,8%	55%
	Total private:	17,5%	77,1%	45,6%
ENGO (public interests)	BirdLife Europe, ClientEarth, EEB, WWF EPO	66,7%	16,7%	41,7%
	Seas at Risk	63,6%	18,2%	45,5%
	EEA, EEB, TNCE, WI-EA, WWF EPO	66,7%	25%	50%
	Total Public:	65,7%	20%	45,7%

Note. Percentages established by dividing the total scores of IG by the maximum score that could be achieved on each policy issue. See Appendix G for the scores for total preference attainment.

4.3.2 Phase II: The Amendment Phase

The draft report now forms the agenda for the open amendment phase. During this phase all MEPs are free to submit their amendments to the proposal (Marshall, 2010). There was only one week scheduled to table the amendments for the NRL (European Parliament, 2023a), which requires bold action from IG. This is generally the moment for those IG who have been unsuccessful in getting their views reflected in the draft report to convince other, more receptive MEPs to launch amendments that align with their preferences (Dionigi, 2019). Furthermore, the increase in opportunities for IG to send in amendments often results in high levels of informal lobbying activities. This means that tracing amendments in this phase is challenging, resulting in limited available data for analysis.

4.3.3 Phase III: The Final Outcomes

The proposal received 2345 amendments in total. In an attempt to reduce the amendments and reconcile the positions of Parliament's political groups, the rapporteur works on establishing compromise

amendments (CA) (Dionigi, 2019). Also, now that the opportunity to submit amendments is closed, the focus of IG activities shifts from persuading MEPs to propose amendments to persuading them on how to vote, sometimes involving the distribution of voting lists to MEPs (Rasmussen, 2012a). These lists are way to get MEPs, who are pressed for time and sometimes lack sufficient knowledge, to vote in line with the preferences of IG (Kohler-Koch, 1998). In other words, the EP's extensive workload provides room for IG to influence MEPs in their voting behavior (Rasmussen, 2012b).

Spread over two meetings, ENVI voted on 30 CA (European Parliament, 2023b) on June 15 and 27 (European Parliament, 2023c). Luena's CA are less ambitious than his draft report because he has to consider all the submitted amendments. Nevertheless, they still maintain the initially proposed targets (European Parliament, 2023b). Eventually 21 CA were adopted, but the final vote on the draft report ended in a tie, 44 votes in favor to 44 votes against (with no abstentions), meaning that there is no majority to support the report as such (European Parliament, 2023c). Due to time constraints from the upcoming European elections and the already scheduled plenary vote on July 12, it was decided that the plenary had to vote on the proposal without a committee report majority (WWF, 2023).

The proposal is thus tabled for plenary and the dossier now includes the associated committees' opinions, the committee report with pending CA, and 146 new amendments submitted for plenary (European Parliament, n.d.a). A day prior to the plenary vote, a lengthy debate of almost three hours was held on 11 July 2023 where in total 80 MEPs took the floor to participate in the debate and express their opinion on the proposal (European Parliament, 2023d). According to Dionigi (2017), this high number of MEPs indicates that a lot of attention is located toward this proposal. The next day, the EP first voted on the request for rejection of the proposal which was rejected with 312 votes in favor and 324 votes against (and 12 abstentions) (European Parliament, 2023e). Followed by the vote on the amendments and the final report with 336 votes in favor, 300 against (and 13 abstentions). In total 136 amendments were adopted, severely weakening the proposal (see [Appendix C](#) for an overview of what this entails for the policy issues) (Cliquet et al., 2024; European Parliament, 2023f). This is also reflected in the preference attainment of the IG at this stage (Table 3). In comparison to the draft report the situation is now completely reversed and the private IG have been able to effectively influence the EP. Almost all quantitative, time-bound binding targets are removed (European Parliament, 2023f). Another notable change is that the restoration obligations for agricultural ecosystems were completely deleted and financing of restoration measures from agricultural funds is excluded. That these amendments align with the preferences of private IG is also reflected in [Appendix H](#).

Now that the EP adopted its position, it was time to start the inter-institutional negotiations on the final shape of the legislation together with the Council and EC. The negotiations were led by ENVI, on behalf of the EP. The Council already presented its position on the proposal in June 2023 (Council of the European Union, 2023a). This position also includes a significant decrease in ambitions, while still being much higher than the position of the EP after the voting in July (Cliquet et al., 2024). On 9 November 2023, an agreement was reached (Paulus, 2023) and approved by ENVI on 29 November, resulting in a so-called Compromise (Legislative Train Schedule, 2024). This Compromise rolled back some of the most radical amendments from the EP (see [Appendix C](#)). Overall, the headline targets for 2030 and 2050 still stand. However, any modifications to the specific targets involve reductions and no increased targets are included in this compromise (Council of the European Union, 2023b). Furthermore, a new article that has been

introduced in the Compromise is the ‘emergency brake’ (Cliquet et al., 2024). This clause allows that under circumstances that threaten the food security in the EU, all relevant articles of Article 9 (on agricultural ecosystems) may be temporarily suspended (Canas, 2024).

The last step is the final vote. The full Parliament voted on the Compromise on 27 February 2024 which resulted in 329 votes in favor, 275 against (and 24 abstentions) (European Parliament, 2024a). This Compromise tied in closer to the proposal than the amendments adopted in the final report. However, its ambition level is still severely weakened. Table 3 shows that this phase has no ‘real’ winners: except for CEPI, the scores do not go much higher than 50%. Yet, the results at this phase show less outliers that are skewed towards either the NGOs or the private IG. Hence, the final outcome can indeed be considered a compromise, balancing the preferences of the IG.

4.4 Explaining IG Influence

The analysis of the proposal's evolution across the three phases illustrates varying success rates for the IG in influencing policy outcomes. The aim of the remainder of this chapter is to explore how the contextual factors contributed to these disparities in IG’ ability to achieve their preferences. This is done along the lines of the conceptual framework and testing the hypotheses.

4.4.1 IG Factors

Derived from the logic of collective action (Olson, 1965) it is expected that IG representing private interests have a higher potential to secure their preferences in the policy outcomes. However, the results from the NRL show that, during the draft report phase, the NGOs scored better in attaining their preferences than the private IG. Conversely, during the final report phase, the situation changed and the outcomes were in favor of the private IG. Eventually, the results of the final outcome show that the preferences attained by the private IG is almost the same as the NGOs (see Table 3). Hence, the basic premise that expects private interests to be more influential does not prevail in this case. According to Dionigi (2017), this is because the premise lacks explanatory power and must consider contextual factors such as unity among private interests and limited counterlobbying.

First, the NGOs have clearly been better at forming a unity than the private IG. This unity is reflected in their position papers, where they consistently use the same arguments and present a clear message for the MEPs. Conversely, the private IG did not manage to unite over the overarching objectives of the proposal, as shown by the absence of a cross-coalition connecting the different industries. Moreover, the position papers of the private IG primarily focus on the articles that potentially threaten their sector. Another indication of a lack of unity among private interests is the joint statement signed by over 60 multinationals. In this statement, large firms argue that restoring nature is beneficial for businesses in the long run (Our nature our business, 2024), creating even more division among the private interests. Hence, the results align with the findings from Wonka et al. (2018) where it is argued that private groups often actually lobby against each other. Consequently, it explains why private IG did not meet their expectations regarding the NRL. If the private IG were able to form a unity, they could have used their organizational and financial resources in

unison to work towards common ends, making it harder for the opposing IG to influence the same dossier (Dionigi, 2017).

The second contextual factor considers the degree of counterlobbying. The NRL is a dossier that is heavily lobbied by all kind of IG (Guillot, 2023). Looking at the literature, this can be explained by the fact that this is a regulatory policy where opposing groups are most likely (Dür & De Bièvre, 2008). Moreover, the legislative process of the NRL is largely dominated by media campaigns started by certain private IG (agriculture, forestry, and fisheries), spreading several misunderstandings (Cliquet et al., 2024). In a reaction to these claims, the #Restorenature (2024) campaign was created by civil organizations and received over a million signatures. These campaigns, coming from both sides, resulted in the creation of multiple conflicting frames about the issue and hinders IG' ability to persuade MEPs of their perspective. Hence, looking at these two contextual factors and their ability to explain why private interests did not score better on the preference attainment in the final outcome, H1 can be accepted.

A second explanation for IG influence in relation to IG characteristics is about their resources. Table 4 shows that the average FTEs coming from the NGOs are almost four times higher than the FTEs from the private IG. This suggests that NGOs achieve the highest scores in preference attainment across the policy process. However, the results show that this is not the case. Furthermore, EEB and WWF EPO hold the highest amount of FTE of all IG, but still score lower than CEPI and Eustafor in the final outcomes. Taking into consideration that the amount of FTEs does not correspond with significantly higher outcomes, H2 can be rejected.

Table 4*Economic Power IG*

	IG	FTE in lobby activities
Industry (private interests)	Copa	4,8
	Cogeca	4,8
	Europêche	3,0
	ELO	9,8
	UEPG	5,0
	Cerame-Unie	4,5
	Eurogypsum	2,3
	Euromines	6,0
	EXCA	1,0
	FIEC	6,5
	CEPI	6,3
	Eustafor	3,5
	Eurelectric	2,0
	Average Private:	4,6
NGO (public interests)	BirdLife Europe	11,0
	ClientEarth	13,2
	EEB	62,3
	WWF EPO	24,3
	Seas at Risk	7,0
	EEA	3,5
	TNCE	8,5
	WI-EA	7,8
	Average Public:	17,2

Note. FTE is copied from the Transparency Register from European Union. (n.d.a).

4.4.3 Institutional Factors

Now that the IG characteristics and their contextual factors are analyzed, only the institutional factors remain to be examined. Here, it is expected that IG who share the views of MEPs based on their policy bias (Dionigi, 2017) or ideological affinities (Ibenskas & Bunea, 2021) have a higher chance of being able to access and convince the MEPs. However, the extent to which these views lead to policy outcomes is challenged by other committees or institutions. Hence, the contextual factors are determined as receptiveness of the responsible committee towards the IG' views, and how these are subsequently challenged.

To begin with, the results show that the receptiveness of the rapporteur towards the views of IG played a dominant role during the legislative process of the NRL. ENVI is known to be a supporter of environmental concerns and Luena has always made clear to be a big proponent of the proposal (European Parliament, 2024b). This is reflected in the draft report phase wherein Luena holds a welcoming attitude toward NGOs. In addition, predominantly NGOs met with Luena during the first phase ([Appendix I](#)). However, the final outcome shows that this policy bias did not necessary led to biased policy outcomes favoring the position of the NGOs. This can be explained as twofold. First, the associated committees, AGRI and PECH gained more competences under Rule 57, resulting to stricter cooperation and therefore limits ENVI's influence. The clear differences in the opinions made sure that ENVI had to moderate their views to find common ground with AGRI and PECH. This indirectly limited the influence of the NGOs who had found their opening with the rapporteur (Dionigi, 2017). Second, after the plenary vote, the proposal was referred back to ENVI, making them responsible to lead the negotiations during trilogue under the Ordinary Legislative Procedure. The results of the preference attainment show that ENVI has been able to moderate their preferences with the Council. Moreover, the negotiations with the Council tied in closer to the policy bias of ENVI, indicating that in this case a closer cooperation with the Council led to better results for the NGOs as opposed to the results after the plenary vote on the committee document. So, despite key MEPs' receptiveness to NGO views, their ability to secure these views was hindered by close cooperation with associated committees. Similarly, private IG failed to secure high preference attainment scores after the final report due to close cooperation with the council. Therefore, H3 can be accepted.

5. Discussion

This section aims to add an extra layer to the results by elaborating on some interesting findings and reflecting on their significance in the broader research context. Moreover, the study's limitations are addressed acknowledging constraints and potential biases. Finally, we will explore the implications of our findings for both theory and practice.

5.1 Interpretation of the Results

The results of this research challenge the elitist assumptions in IG literature that favor private over public interests' influence on policy outcomes (Dür & De Bièvre, 2008). More recent literature emphasizes the contingent nature of the concept IG influence (Dionigi, 2017; Stevens & De Bruycker, 2020). It is rather about the context and analyzing the circumstances that contribute to a certain outcome. This research adheres to this approach and explains the outcomes by showing that private IG do not necessarily form a cohesive whole and therefore fail to translate their potential for influence in successful results. Moreover, this research confirms Stevens and De Bruycker's (2020) findings on the 'limits of influence,' showing that economic resources cannot be generalized across policy contexts.

Another interesting finding relates to the institutional structures of the EP and how this shapes the strategies used by IG. Generally, IG face the choice to contact MEPs directly or to generate pressure indirectly by appealing to the public at large (De Bruycker & Beyers, 2019). During the first phase predominantly NGOs contacted the key MEPs directly (see [Appendix I](#)). The analysis explains this by the receptiveness of these MEPs. However, there is also the decision not to reach out directly to the MEPs because of a lack of access to relevant MEPs (Ibenskas & Bunea, 2021), or with the aim to involve a larger audience of stakeholders (De Bruycker & Beyers, 2019). Regardless of their exact motive, the lobbying activities of the private IG involved severe outside lobbying activities, culminating in the farmers protests in Brussels (Menga, 2024). This is not a very common situation, as private IG tend to be more successful in the case of *quiet politics* while privatizing the conflict behind closed doors (Culpepper, 2008; De Bruycker & Beyers, 2019; Dionigi, 2017). This is because when the issue is not taken up by the public, private IG are in a favorable position to shape policymakers' minds due to their possession of technical knowledge, something that public IG often find difficult to match (Dionigi, 2017). With the NRL, eventually both groups used different outside lobbying tactics, making this a highly politicized dossier (Schauenberg, 2023). The findings of this research therefore show that EU policymaking cannot be reduced to a purely technical endeavor, even for the private IG (De Bruycker & Beyers, 2019).

The final noteworthy observation is about the role of Copa & Cogeca in this process. Their only demand was to reject the proposal as a whole. To achieve this goal they released several press releases containing misinformation (Aragoa et al., 2023) initiated a public campaign (Cliquet et al., 2024), were active on social media (Copa-Cogeca, 2023), and organized multiple large protests across Europe and in Brussels (Menga, 2024). However, the proposal is still accepted meaning that Copa & Cogeca's all-or-nothing strategy resulted in nothing. This is what Dür et al. (2015) explain as private actors often being unsuccessful in achieving their desired policy outcomes due to their attempts to defend the status quo.

Especially in the EU where most proposals eventually lead to legislation, it could be argued that Copa & Cogeca might have gained more by focussing on limiting their losses rather than defending the status quo.

5.2 Limitations

Despite the interesting results, this research is also subject to limitations. First, as discussed in the methodological chapter, process-tracing is an approach that largely depends on interviews with relevant stakeholders. For this research, there are no interviews conducted because of the limited time and lack of access to the relevant stakeholders. This means that one of the strengths of process tracing, uncovering the ‘black boxes’ through which influence is exercised, is not fully being realized. Despite valuable information being obtained through the EP databases, it does not encompass exchanges between MEPs and IG through private channels or informal meetings, limiting comprehensive insights. Additionally, interviewing the IG could have prevented the missing data on the policy issues where IG did not indicate their position on in their position papers, enhancing the quality of the preference attainment.

Another limitation regarding the preference attainment is the use of the ordinal scale that reduces valuable information to numbers. By comparing the position papers it became evident that there are large differences between how clearly the preferences were defined. Consider ELO's (2023) comprehensive position paper with amendments for all articles, contrasting with FIEC's (2023) preferences summarized in three bullet points. These differences are not reflected in the scores. Moreover, codification of the information from the position papers is highly susceptible to the researchers interpretation, which comes with a risk of reducing the reliability of the research (Glazier et al., 2024).

Next are some limitations regarding the selection of IG. Their selection was based on the availability of a position paper published by them. However, this means that IG who submitted or discussed their preferences directly with the MEPs are not included in the sample. Their activities and possible influence is not taken into account which may resulted in assigning their lobbying efforts to other IG from the sample that share the same preferences. Moreover, some position papers were signed by multiple IG, making it difficult to differentiate between them and assess their individual lobbying efforts for the NRL.

In addition, some statements can be made after a critical reflection on the chosen framework and its variables. It is highly probable that the conceptual model does not incorporate all variables that are able to explain all outcomes. For instance, the potential effects of issue salience are not included in the analysis. However, it is likely that this determinant played a role in the level of IG influence on the final policy outcomes. Another challenge is establishing the proper relationship between these variables, termed internal validity. Contextual variables are now considered moderating factors, elucidating the relation between the potential that IG hold for influence and their ability to translate this into actual influence. However, certainty about this relationship is challenging due to potential confounding variables. Lastly, the specific nature of this legislative process limits the generalizability of findings, reducing external validity.

5.3 Implications

Despite its limitations, this results of this research may be important for theory and practice. First, this study advances our understanding of the preferences articulated by IG who are active on climate

policies. Moreover, it explores the conditions that enable them to achieve their preferences in this domain. Overall, the findings contribute to theory that a policy like the NRL, that is suitable for mobilization along societal lines, can counterbalance the impact of IG characteristics on their influence, showing their 'limits of influence'.

Second, this research emphasizes the decisive role that the institutional structure of the EP had in determining IG influence at specific moments throughout the process. In doing so, it responds to the request of various authors who want to highlight the nuanced differences between lobbying the EC and the EP. There are generally two elements that can contribute to new theoretical insights. To begin with, the EP is an institution where political ideologies play a dominant role in both the recognition of IG and in the strategies of the IG in targeting the MEPs (De Bruycker, 2016; Ibenskas & Bunea, 2021). In the case of the NRL, the campaign led by the EPP, whose constituents consists largely of farmers, mainly attracted private IG, while the socialistic nature of the S&D predominantly attracted the NGOs, creating the two camps in the EP (De Bruycker, 2016). This makes you wonder what had happened if the rapporteur shared more of the ideologies of the EPP. This links to the second point, namely the power that the key MEPs hold. The institutional structure of the EP reserves a significant amount of power for key MEPs, raising questions about what their exposure to IG means for their role as representatives of European citizens. This highlights the need to consider the concentrated power of key MEPs and prevent them from being unduly influenced by IG' agendas.

This research does not only contribute to science, but also comes with some practical implications. Addressing both sides and starting with the EU officials, the results suggest that the trilogue has served its goal: a document has been created that balances the interests and does not listen to the demand to reject the complete proposal. It is important that by means of negotiations the EP does not become an obstacle for law-making, instead of rejecting the discussion and debate. Lastly, and pointed towards the IG, this research shows that it is possible to defend your interests at the EU level while recognizing that is an extremely complex game that is contingent upon multiple factors.

6. Conclusion

This research set out to explain what determines IG influence by analyzing the legislative process of the NRL in the EP. The main argument of this research is that IG influence is a contingent concept that needs to be studied in its context. The results showed that the elitist assumptions about actor type and resources do not hold in the case of the NRL. This can be explained by the lack of unity among private interests and the high level of counterlobbying. Moreover, the institutional structures of the EP provided NGOs with a favorable starting position. Eventually, the rapporteur guided the proposal through an unpredictable parliament, where some MEPs seemed to have a double agenda in view of the upcoming elections. Regarding the overall research question, it remains debatable if this proposal has any real winners, or represents a compromise that is sub-optimal for both sides, resulting in losers from both sides. Nevertheless, the final outcome at least includes some preferences from all IG indicating their influence on the legislative process. The potential influence for NGOs, facilitated by ENVI, was hindered by misinformation spread by the private IG which was taken up by AGRI, PECH and the EPP. Conversely, private IG turned out to be their own biggest opponent due to their contribution to creating multiple conflicting frames.

With this research, we encourage other researchers to test whether the findings hold true in diverse contexts. This study utilized a single-case study; therefore, to increase its external validity, future research should examine the influence of IG through a comparative case study. Particularly in the context of EU climate policies, where resistance to green policies is growing across Europe, such research is highly relevant. A comparative case study can further analyze which IG lobby on EU climate policies and under what conditions these groups achieve their policy goals. This is crucial for ensuring efficient climate policy solutions in the future.

Moreover, researching and analyzing multiple policies allows for the study of IG influence within its issue context which is not considered in this single-case study. Other issue characteristics may determine the influence of IG, such as the technicalities of a policy dossier (Rasmussen, 2012b), public opinion (De Bruycker & Colli, 2023), issue salience (Klüver, 2011), or media salience (Stevens & De Bruycker, 2020).

In addition, the results of this research could be enhanced by still conducting interviews to get a more detailed picture of all the preferences of the IG. This would reduce the possible researcher bias in the codification of the preference attainment scores. Moreover, it could further unravel the mechanisms through which IG try to exert their influence on the proposal. Notwithstanding these promising pathways for future research, the results of this research highlight that IG find themselves in the position to be able to influence EU policies. However, the extent of their influence depends on many factors. This suggests that under different circumstances, the influence of IG, could have varied significantly.

7. References: Primary Sources

- CEPI. (2022). Capi position paper on the proposal for a regulation on Nature Restoration. *Cepi*. <https://www.cepi.org/cepi-views-on-the-proposal-for-a-regulation-on-naturerestoration/>
- Copa-Cogeca. [@COPACOGECA]. (2023, July 10). *Tomorrow we will be in #Strasbourg in front of the @EUparliament to send out a clear and simple message: YES to nature restoration, NO to THIS LAW on Nature Restoration!* [Post]. X. <https://x.com/COPACOGECA/status/1678316838294372352>
- Council of the European Union. (2023a, June 20). *Interinstitutional File (10867/23)*. <https://www.consilium.europa.eu/media/65128/st10867-en23.pdf>
- Council of the European Union. (2023b, November 22). *Interinstitutional File (15907/23)*. <https://data.consilium.europa.eu/doc/document/ST-15907-2023-INIT/en/pdf>
- EEA. (2022). Restoration of the natural connectivity of rivers and natural functions of the related floodplains in the Nature Restoration Law. *European Angels Alliance*. <https://www.eaa-europe.org/positions/nature-restoration-law-2022.html>
- ELO. (2022). Time bound targets and restoration actions outside Natura2000. *European Landowners Organization*. <https://europeanlandowners.org/publications/time-bound-targets-and-restoration-actions-outside-natura2000/>
- ELO. (2023). Open letter to MEPs on Draft report on the proposal for a regulation of the European Parliament and the Council on nature restoration. *European Landowners Organization*. <https://europeanlandowners.org/publications/open-letter-to-meps-on-draft-report-on-nature-restoration/>
- Eurelectric. (2022). Position paper: Nature Restoration Law. *Eurelectric*. <https://www.eurelectric.org/publications/position-paper-nature-restoration-law>
- Euromines. (2023). Joint Position Paper - Nature Restoration Law. *Euromines*. https://euromines.org/files/joint_position_paper_on_the_nature_restoration_law.pdf
- European Commission. (2020). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. EU Biodiversity Strategy for 2030. Bringing nature back into our lives, COM(2020) 380 final*. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52020DC0380>
- European Commission. (2022). *Proposal for a Regulation of the European Parliament and of the Council on Nature Restoration 2022/0195 (COM/2022/304)*. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022PC0304>
- European Parliament. (2022a, September 12). *Results of the ENVI Coordinators' meetings*. https://www.europarl.europa.eu/cmsdata/254417/09_12_coordinators_results.pdf
- European Parliament. (2022b, October 25). *Results of the ENVI Coordinators' meetings*. https://www.europarl.europa.eu/cmsdata/257192/10_25_coordinators_results.pdf
- European Parliament. (2022c). *Draft Report on the proposal for a regulation of the European Parliament and of the Council on nature restoration (PE737.282v01-00)*. https://www.europarl.europa.eu/doceo/document/ENVI-PR-737282_EN.pdf
- European Parliament. (2023a). *Draft Agenda (ENVI(2023)0112_1)*. https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ENVI/OJ/2023/01-12/1269225EN.pdf

- European Parliament. (2023b). *Compromise Amendments*. https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ENVI/AMC/2023/06-15/NRR_CA_final_EN.pdf
- European Parliament. (2023c). *Committee on Environment, Food Safety and Public Health Result of roll-call votes 15 June 2023 and 27 June 2023*. https://www.europarl.europa.eu/cmsdata/272660/2023-06-15_and_2023-06-27_votes_and_roll-call_votes.pdf
- European Parliament. (2023d). *Sitting of 11-07-2023*. <https://www.europarl.europa.eu/plenary/en/vod.html?mode=chapter&vodLanguage=EN&playerStartTime=20230711-09:02:22&playerEndTime=20230711-11:39:58#>
- European Parliament. (2023e). *Minutes - results of votes*. https://www.europarl.europa.eu/doceo/document/PV-9-2023-07-12-VOT_EN.html
- European Parliament. (2023f). *Text adopted (P9_TA(2023)0277)*. https://www.europarl.europa.eu/doceo/document/TA-9-2023-0277_EN.html
- European Parliament. (2024a). *Minutes Tuesday, 27 February 2024 - Strasbourg*. https://www.europarl.europa.eu/doceo/document/PV-9-2024-02-27-ITM-007-09_EN.html
- European Parliament. (2024b). *Press conference by César LUENA, rapporteur on EU Nature Restoration Law* [Press Conference]. https://multimedia.europarl.europa.eu/en/webstreaming/press-conference-by-cesar-luena-rapporteur-on-eu-nature-restoration-law_20240227-1330-SPECIAL-PRESSER
- European Parliament. (n.d.a). *Report on the proposal for a regulation of the European Parliament and of the Council on nature restoration (A9-0220/2023)*. https://www.europarl.europa.eu/doceo/document/A-9-2023-0220_EN.html
- European Parliament. (n.d.b). *MEPs European Parliament*. <https://www.europarl.europa.eu/meps/en/search-meetings>
- Europêche. (2023). *United call for rejection of unrealistic nature legislation that endangers farmers and fishers' livelihoods and food production in the EU*. *Europêche*. <https://europeche.chil.me/post/united-call-for-rejection-of-unrealistic-nature-legislation-that-endangers-farmer-444149>
- Eustafor. (2023). *EUSTAFOR's policy asks for the European Parliament's Position on the EU Nature Restoration proposal*. *Eustafor*. https://eustafor.eu/uploads/New-EU-nature-restoration-law-EUSTAFOR-policy-demands_FINAL.pdf
- FIEC. (2023). *Subject: Nature Restoration Law*. *FIEC*. https://www.fiec.eu/application/files/8117/1023/6648/FIEC_Letter_to_MEPs_Council_Nature_Restoration_Law_Proposal.pdf
- Seas at Risk. (2022). *Joint marine NGO position paper on the Nature Restoration Law*. *Seas at Risk*. <https://seas-at-risk.org/publications/joint-marine-ngo-position-paper-on-the-nature-restoration-law/>
- Wetlands. (2022). *Our position on the draft EU Nature Restoration Law*. *Wetlands International*. <https://europe.wetlands.org/publications/our-position-on-the-draft-eu-nature-restoration-law/>
- WWF. (2022). *Proposal for a regulation on nature restoration - NGO analysis*. *WWF*. <https://www.wwf.eu/?7267966/Joint-NGO-analysis-on-the-proposal-for-a-regulation-on-nature-restoration>

8. References: Secondary Sources

- Aragao, A., Born, C.-H., Ciscato, E., Cliquet, A., Decler, K., Dotinga, H., Fleurke, F., Leucci, F., Mauerhofer, V., Meertens, M., Mendes, A., Reese, M., Schoukens, H., Trouwborst, A., van Hoorick, G., & Verschuuren, J. (2023). Legal assessment explaining why COPA*COGECA's objections against the Nature Restoration Act proposal are misleading. *Society for Ecological Restoration*. <https://serchapter2018.wpenginepowered.com/europe/files/2023/07/legal-assessment-of-Copa-Cogeca-objections-.pdf>
- Beyers, J. (2004). Voice and Access: Political Practices of European Interest Associations. *European Union Politics*, 5(2), 211-240. <https://doi.org/10.1177/1465116504042442>
- Bunea, A. (2013). Issues, preferences and ties: determinants of interest groups' preference attainment in the EU environmental policy. *Journal of European Public Policy*, 20(4), 552-570. <https://doi.org/10.1080/13501763.2012.726467>
- Canas, N. (2024, February 27). Contested Nature Restoration Law passes EU Parliament, despite last-minute revolt. *Euractiv*. <https://www.euractiv.com/section/biodiversity/news/contested-nature-restoration-law-passes-eu-parliament-despite-last-minute-revolt/>
- Cliquet, A., Aragão, A., Meertens, M., Schoukens, H., & Decler, K. (2024). The negotiation process of the EU Nature Restoration Law Proposal: bringing nature back in Europe against the backdrop of political turmoil?. *Restoration Ecology*, e14158. <https://doi.org/10.1111/rec.14158>
- Creswell, J.W., & Creswell, J.D. (2022). *Research design: Qualitative, quantitative, and mixed methods approaches* (6th ed.). Sage.
- Culpepper, P. D. (2008). Business power, policy salience, and the study of politics. *European Studies Forum*, 38(2), 5–11.
- Decler, K., & Cliquet, A. (2023). Nature restoration: proposed EU law under threat. *Nature* 619, 252. <https://doi.org/10.1038/d41586-023-02228-x>
- De Bruycker, I. (2016). Power and position: Which EU party groups do lobbyists prioritize and why? *Party Politics*, 22(4), 552-562. <https://doi.org/10.1177/1354068816642803>
- De Bruycker, I., & Beyers, J. (2019). Lobbying strategies and success: Inside and outside lobbying in European Union legislative politics. *European Political Science Review*, 11(1), 57-74. <https://doi.org/10.1017/S1755773918000218>
- De Bruycker, I., & Colli, F. (2023). Affluence, congruence, and lobbying success in EU climate policy. *Journal of Public Policy*, 43(3), 512-532. doi:10.1017/S0143814X23000120
- Dialer, D., & Richter, M. (2019). Lobbying in Europe: Professionals, Politicians, and Institutions Under General Suspicion?. In: Dialer, D., Richter, M. (eds) *Lobbying in the European Union*. Springer, Cham. https://doi.org/10.1007/978-3-319-98800-9_1
- Dionigi, M. K. (2017). Lobbying in the European Parliament. In: Springer eBooks. <https://doi.org/10.1007/978-3-319-42688-4>
- Dionigi, M.K. (2019). Lobbying in the European Parliament: Who Tips the Scales?. In: Dialer, D., Richter, M. (eds) *Lobbying in the European Union*. Springer, Cham. https://doi.org/10.1007/978-3-319-98800-9_10

- Dür, A. (2008). Measuring interest group influence in the EU: A note on methodology. *European Union Politics*, 9(4), 559-576. <https://doi.org/10.1177/1465116508095151>
- Dür, A., & De Bièvre, D. (2007). The question of interest group influence. *Journal of Public Policy*, 27(1), 1-12. doi:10.1017/S0143814X07000591
- Dür, A., & Mateo, G. (2014). The Europeanization of interest groups: Group type, resources and policy area. *European Union Politics*, 15(4), 572-594. <https://doi.org/10.1177/1465116514532556>
- Dür, A., Bernhagen, P., & Marshall, D. (2015). Interest Group Success in the European Union: When (and Why) Does Business Lose? *Comparative Political Studies*, 48(8), 951-983. <https://doi.org/10.1177/0010414014565890>
- Eising, R. (2008). Interest groups in EU policy-making. *Living Rev. Euro. Gov.*[Online Article]. <http://www.livingreviews.org/lreg-2008-4>
- European Commission. (n.d.). *Nature Restoration Law*. https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en
- European Council. (2013, May 16). *Interest groups in EU decision-making*. <https://www.consilium.europa.eu/en/documents-publications/library/library-blog/posts/interest-groups-in-eu-decision-making/>
- European Union. (n.d.a). *Transparency register*. https://commission.europa.eu/about-european-commission/service-standards-and-principles/transparency/transparency-register_en
- European Union. (n.d.b). *Types of legislation*. https://european-union.europa.eu/institutions-law-budget/law/types-legislation_en
- EPRS. (2020). What role for the European Parliament's committees and how do they work?. *EPRS*. <https://epthinktank.eu/2020/05/06/what-role-for-the-european-parliaments-committees-and-how-do-they-work/>
- Flöthe, L. (2019). The costs of interest representation – a resource perspective on informational lobbying. *European Political Science Review*, 11(2), 161–178. doi:10.1017/S1755773919000055
- Flyvbjerg, B. (2006). Five Misunderstandings About Case-Study Research. *Qualitative Inquiry*, 12(2), 219-245. <https://doi.org/10.1177/1077800405284363>
- Flyvbjerg, B. (2011). Case study. *The Sage handbook of qualitative research*, 4, 301-316.
- Gilligan, T. W., & Krehbiel, K. (1997). Specialization decisions within committee. *The Journal of Law, Economics, and Organization*, 13(2), 366-386. <https://doi.org/10.1093/oxfordjournals.jleo.a023388>
- Glazier, R. A., Boydston, A. E., & Feezell, J. T. (2021). Self-coding: A method to assess semantic validity and bias when coding open-ended responses. *Research & Politics*, 8(3). <https://doi.org/10.1177/20531680211031752>
- Greenwood, J. (2019). Interest organizations and European Union politics. In Thompson, W.R. (ed.) *Oxford research encyclopedia of politics*. Oxford: Oxford University Press [online], article ID 1162. <https://doi.org/10.1093/acrefore/9780190228637.013.1162>
- Greene, J. C., & Caracelli, V. J. (Eds.). (1997). *Advances in mixed- method evaluation: The challenges and benefits of integrating diverse paradigms (New Directions for Evaluation, No. 74)*. Jossey-Bass.
- Guillot, L. (2023, July 11). Who's who in the EU's fight over nature restoration. *Politico*. <https://www.politico.eu/article/nature-restoration-law-europe-who-is-who/>

- Guillot, L. (2024, June 17). Rogue Austrian minister burns bridges to save EU nature law. *Politico*. <https://www.politico.eu/article/rogue-austria-environment-minister-leonore-gewessler-burns-bridges-save-eu-nature-restoration-law/>
- Hanegraaff, M. (2015). Interest groups at transnational negotiation conferences: Goals, strategies, interactions, and influence. *Global Governance*, 21(4), 599–620.
- Hart, P., & Kleiboer, M. (1995). Policy controversies in the negotiatory state. *Knowledge and Policy*, 8(4), 5-25. <https://doi.org/10.1007/bf02832227>
- Hering, D., Schürings, C., Wenskus, F., Blackstock, K., Borja, A., Birk, S., Bullock, C., Carvalho, L., Dagher-Kharrat, M. B., Lakner, S., Lovrić, N., McGuinness, S., Nabuurs, G.-J., Sánchez-Arcilla, A., Settele, J., & Pe'er, G. (2023a). Securing success for the Nature Restoration Law. *Science*, 382(6676), 1248-1250. <https://doi.org/10.1126/science.adk1658>
- Hermansson, H. (2015). Privileged access to the European Commission's stakeholder consultations. In P. S. Shotton & P. G. Nixon (Eds.), *Lobbying the European Union. Changing minds, changing time*. Burlington: Ashgate. Ch. 6.
- Hix, S., & Høyland, B. (2022). *The political system of the European Union* (4th ed.). Bloomsbury Publishing.
- Horizon. (n.d.). Climate change and biodiversity loss should be tackled together. *Horizon The EU Research & Innovation Magazine*. <https://projects.research-and-innovation.ec.europa.eu/en/horizon-magazine/climate-change-and-biodiversity-loss-should-be-tackled-together>
- Ibenskas, R., & Bunea, A. (2021). Legislators, organizations and ties: Understanding interest group recognition in the European Parliament. *European Journal of Political Research*, 60(3), 560-582. <https://doi.org/10.1111/1475-6765.12412>
- Klüver, H. (2011). The contextual nature of lobbying: Explaining lobbying success in the European Union. *European Union Politics*, 12(4), 483–506. <https://doi.org/10.1177/1465116511413163>
- Klüver, H. (2012). Biasing politics? Interest group participation in EU policy-making. *West European Politics*, 35(5), 1114-1133. <https://doi.org/10.1080/01402382.2012.706413>
- 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. <https://doi.org/10.1080/13501763.2015.1008792>
- Kohler-Koch, B. (1998). Organised interests in the EU and the European Parliament. In P. H. Claeys, C. Gobin & P. Winard (Eds.), *Lobbying, Pluralism and European Integration*. Brussels: European Interuniversity Press.
- Legislative Train Schedule (2024, January 20). *Proposal for a regulation on nature restoration*. <https://www.europarl.europa.eu/legislative-train/theme-a-european-green-deal/file-restoration-of-healthy-ecosystems>
- Legislative Observatory. (n.d.). *2022/0195(COD) - Nature restoration*. [https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2022/0195\(COD\)&l=en](https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2022/0195(COD)&l=en)
- Mahoney, C. (2007). Lobbying success in the United States and the European Union. *Journal of Public Policy*, 27(1), 35-56. doi:10.1017/S0143814X07000608

- Manzanaro, S. (2024, June 27). EU countries rubberstamp Nature Restoration Law after months of deadlock. *Euractiv*. <https://www.euractiv.com/section/agriculture-food/news/breaking-eu-countries-rubberstamp-nature-restoration-law-after-months-of-deadlock/>
- Marshall, D. (2010). Who to lobby and when: Institutional determinants of interest group strategies in European Parliament committees. *European Union Politics*, 11(4), 553-575. <https://doi.org/10.1177/1465116510382462>
- Marshall, D. (2012). Do rapporteurs receive independent expert policy advice? Indirect lobbying via the European Parliament's committee secretariat. *Journal of European Public Policy*, 19(9), 1377-1395. <https://doi.org/10.1080/13501763.2012.662070>
- Marshall, D. (2015). Explaining Interest Group Interactions with Party Group Members in the European Parliament: Dominant Party Groups and Coalition Formation. *JCMS: Journal of Common Market Studies*, 53(2), 311-329. <https://doi.org/10.1111/jcms.12163>
- Menga, M. (2024, April 9). The rocky path to Europe's Nature Restoration Law. *Foresight*. <https://www.climateforesight.eu/articles/the-rocky-path-to-europes-nature-restoration-law/>
- Michalowitz, I. (2004). Analysing structured paths of lobbying behaviour: Why discussing the involvement of 'civil society' does not solve the EU's democratic deficit. *Journal of European Integration*, 26(2), 145-173. <https://doi.org/10.1080/0703633042000222367>
- Michalowitz, I. (2007). What determines influence? Assessing conditions for decision-making influence of interest groups in the EU. *Journal of European Public Policy*, 14(1), 132-151. <https://doi.org/10.1080/13501760601072719>
- Molnar, G. (1967). Deviant case analysis in social science. *Politics*, 2(1), 1-11. <https://doi.org/10.1080/00323266708401093>
- Olson, M. (1965). *The Logic of Collective Action: Public Goods and the Theory of Groups*. Cambridge, MA: Harvard University Press.
- Orach, K., Schlüter, M., & Österblom, H. (2017). Tracing a pathway to success: How competing interest groups influenced the 2013 EU Common Fisheries Policy reform. *Environmental Science & Policy*, 76, 90-102. <https://doi.org/10.1016/j.envsci.2017.06.010>
- Our nature our business. (2024). Business Statement. *Our Nature Our Business*. <https://www.ournatureourbusiness.eu/>
- Paulus, J. (2023, November 10). *Nature Restoration Law adopted in trilogue, but still a long way to go*. <https://www.euractiv.com/section/biodiversity/opinion/nature-restoration-law-adopted-in-trilogue-but-still-a-long-way-to-go/>
- Rasmussen, M. (2012a). Is the European Parliament still a policy champion for environmental interests?. *Interest Groups & Advocacy*, 1, 239-259 (2012). <https://doi.org/10.1057/iga.2012.12>
- Rasmussen, M. (2012b). *The influence of interest groups in the European Parliament: does policy shape politics?* (Doctoral dissertation, London school of economics and political science).
- Rasmussen, M. (2015). The battle for influence: The politics of business lobbying in the European Parliament. *JCMS: Journal of Common Market Studies*, 53(2), 365-382. <https://doi.org/10.1111/jcms.12156>
- Reuters. (2023, August 10). Resistance to green policies around Europe. *Reuters*. <https://www.reuters.com/sustainability/resistance-green-policies-around-europe-2023-08-10/>

- Schauenberg, T. (2023, December 7). Farmers revolt against EU's historic nature restoration law. *DW*. <https://www.dw.com/en/farmers-revolt-against-eus-historic-nature-restoration-law/a-65735393>
- Seawright, J., & Gerring, J. (2008). Case Selection Techniques in Case Study Research: A Menu of Qualitative and Quantitative Options. *Political Research Quarterly*, 61(2), 294-308. <https://doi.org/10.1177/1065912907313077>
- Stevens, F., & de Bruycker, I. (2020). Influence, affluence and media salience: Economic resources and lobbying influence in the European Union. *European Union Politics*, 21(4), 728–750. <https://doi.org/10.1177/1465116520944572>
- Tracy, S. J. (2010). Qualitative Quality: Eight “Big-Tent” Criteria for Excellent Qualitative Research. *Qualitative Inquiry*, 16(10), 837-851. <https://doi.org/10.1177/1077800410383121>
- Voltolini, B. (2017). Framing processes and lobbying in EU foreign policy: Case study and process-tracing methods. *European Political Science*, 16, 354-368. <https://doi.org/10.1057/eps.2016.18>
- Wonka, A., De Bruycker, I., De Bièvre, D., Braun, C., & Beyers, J. (2018). Patterns of Conflict and Mobilization: Mapping Interest Group Activity in EU Legislative Policymaking. *Politics and Governance*, 6(3), 136-146. doi:<https://doi.org/10.17645/pag.v6i3.1267>
- WWF. (2023, June 26). Nature Restoration Law: All eyes on the plenary vote. *WWF*. <https://www.wwf.eu/?11077466/Nature-Restoration-Law-All-eyes-on-the-plenary-vote>
- #RestoreNature. (2024). Our fight to #RestoreNature continues!. #RestoreNature. <https://www.restorenature.eu/en>

Appendix A: The Selected Interest Groups

Table 5

Selected Interest Groups

IG	Actor Type	
	Category	Interest
Aggregates Europe (UEPG)	Trade and business associations	Private
Association of National Organisations of Fishing Enterprises in the European Union (Europêche)	Trade and business associations	Private
BirdLife Europe	NGO	Public
ClientEarth	NGO	Public
Confederation of European Paper Industries (CEPI)	Trade and business associations	Private
Eurelectric	Trade and business associations	Private
Eurogypsum	Trade and business associations	Private
European agri-cooperatives (COGECA)	Trade and business associations	Private
European Anglers Alliance (EAA)	NGO	Private
European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines)	Trade and business associations	Private
European Ceramic Industry Association (Cerame-Unie)	Trade and business associations	Private
European Construction Industry Federation (FIEC)	Trade and business associations	Private
European Environmental Bureau (EEB)	NGO	Public
European Expanded Clay Association (EXCA)	Trade and business associations	Private
European Farmers (COPA)	Trade and business associations	Private
European Landowners' Organization (ELO)	NGO	Private
European State Forest Association (EUSTAFOR)	Trade and business associations	Private
Seas At Risk	NGO	Public
The Nature Conservancy Europe (TNCE)	NGO	Public
Wetlands International - European Association (WI-EA)	NGO	Public
WWF European Policy Office (WWF EPO)	NGO	Public

Note. Actor type is copied from the Transparency Register from European Union. (n.d.a).

Appendix B: Key Features of the Proposal for an EU Nature Restoration Law

Chapter I: General Provisions

- Describes the overarching objective (Article 1): to contribute to the continuous, long-term and sustained recovery of biodiverse and resilient nature across the EU's land and sea areas through the restoration of ecosystems. This establishes a framework in which Member States will put in place restoration measures which together shall cover at least 20% of the EU's land and sea areas by 2030 and all ecosystems in need of restoration by 2050.
- Describes the definitions (Article 3) of the following: ecosystem, habitat of a species, restoration, good condition, favourable reference area, sufficient quality of habitat, sufficient quantity of habitat, pollinator, decline of pollinator populations, local administrative unit, cities, towns and suburbs, urban green space, urban tree canopy cover and renewables go-to area

Chapter II: Restoration Targets and Obligations

- Outlines various types of ecosystems and how restoration applies to that type of ecosystem, including specific targets: Restoration of terrestrial, coastal and freshwater ecosystems (Article 4), Restoration of marine ecosystems (Article 5), Restoration of urban ecosystems (Article 6), Restoration of the natural connectivity of rivers and natural functions of the related floodplains (Article 7), Restoration of pollinator populations (Article 8), Restoration of agricultural ecosystems (Article 9) and Restoration of forest ecosystems (Article 10)
- It specifies restoration obligations for Annex I (terrestrial, coastal, and freshwater - Article 4) and Annex II (marine- Article 5) habitat types and a non-deterioration clause within and outside Natura 2000 sites

Chapter III: National Restoration Plans

- The implementation of the restoration obligations and targets in the EU Member States must be done through national restoration plans. The Proposal contains details for both the preparation and content of these plans (articles 11-12)
- The plans will be assessed by the Commission and reviewed at least every 10 years (articles 13-15)

Chapter IV: Monitoring

- The Proposal includes detailed obligations on access to justice, monitoring, and reporting (articles 16-18)

Source: European Commission (2022)

Appendix C: Key Changes to the Commission’s Proposal

Table 6

Key Changes to the Proposal

Document	Targets	Definitions	Implementation
The Commission’s proposal, June 2022	<p>Type of targets:</p> <p>Quantitative, legally binding targets</p> <p>Target Coverage:</p> <ul style="list-style-type: none"> • Article 4: 30% by 2030, 60% by 2040, 90% by 2050 • Article 5: 30% by 2030, 60% by 2040, 100% by 2050 • Article 6: total national area of urban green space targets 3% by 2050 and 5% by 2050, 10% minimum urban tree canopy cover by 2050 • Rewet a quarter of the restored area in 2030, Rewet half of the restored area in 2040, Rewet a quarter of the restored area in 2050 	Article 3, including 15 definitions	<p>Policy Coherence:</p> <p>Proposal refers to:</p> <ul style="list-style-type: none"> • Habitats Directive (HD) • Birds Directive (BD) • Water-Framework Directive (WFD) • Marine Strategy Framework Directive (MSFD) • Biodiversity Strategy for 2030 (BS) • Forest Strategy (FS) • Common Agricultural Policy (CAP) • Common Fisheries Policy (CFP) <p>National Restoration Plans:</p> <ul style="list-style-type: none"> • The timeline for finalization of the NRP takes 36 months <p>Financing:</p> <ul style="list-style-type: none"> • Finance implementation through existing funds • Large share coming from funds that fall under the CFP and CAP

Document	Targets	Definitions	Implementation
<p>The rapporteur's first draft report, ENVI, December 2022</p>	<p>Type of targets: Quantitative, legally binding targets</p> <p>Target Coverage:</p> <ul style="list-style-type: none"> • Article 4 & 5: increase targets to 65% by 2030, and 100% by 2050 • Article 6: increase targets for total national area of urban green space with 1% and to 15% of minimum urban tree canopy cover by 2050 • Article 9: half of the areas should be rewetted in 2030, two thirds should be rewetted in 2040 and 2050 • Planting of three billion additional trees • strengthens the principle of non-deterioration • Non-fulfilment of the obligations allowed in cases of natural disasters 	<p>Added definition:</p> <ul style="list-style-type: none"> • Restoration of the natural connectivity of rivers and natural functions of the related floodplains • Rewetting • Passive restoration <p>Altered definition:</p> <ul style="list-style-type: none"> • Urban green space also includes 'green roofs and green walls' 	<p>Policy Coherence:</p> <ul style="list-style-type: none"> • Include Annex III species (HB) • Mention BD together with HD • Include Directive 2014/89/EU; Directive 2007/60/EC • Improved connectivity between existing protected areas and new areas <p>National Restoration Plans:</p> <ul style="list-style-type: none"> • Speeding up the deadlines for submission of NRP • Add a specific article on public participation, access to public information and public awareness • The timeline for finalization of the NRP takes 26 months <p>Financing:</p> <ul style="list-style-type: none"> • Complete chapter on funding is added to explore new budgetary options such as the reallocation of funds and the establishment of a permanent dedicated nature restoration fund

Document	Targets	Definitions	Implementation
Final report (plenary), July 2023	<p>Type of targets:</p> <ul style="list-style-type: none"> • Member States shall aim to reach overall target • Time-bound, Quantified targets are removed or based on existing regulation <p>Target Coverage:</p> <ul style="list-style-type: none"> • Targets cover Natura 2000 areas • Member states get the ability to assess the condition of all habitat types until 2040 • Instead of non-deterioration obligation for areas for which restoration measures have been taken and a good condition has been reached: making sure that the quality of habitats does not significantly decrease over time • Non-deterioration obligation for protected areas deleted • Non-fulfillment of the obligations allowed in cases of natural disasters • Plans and projected related to renewable energy can be considered an overriding public interest • Clause added for military ground that can be considered as exception • Restoration of agricultural ecosystems removed • Restoration on forest ecosystems is based on qualitative indexes • Planting of three billion additional trees • Targets are subjective to economic, social and cultural requirements and regional and local particularities 	<p>Added definition:</p> <ul style="list-style-type: none"> • Deterioration • Native tree species • Urban centers and urban clusters • Peri-urban areas • Flee flowing river • Rewetting peatland <p>Altered definition:</p> <ul style="list-style-type: none"> • Linking definition of ‘habitat of a species’ to the definition adhered to in HD • ‘Restoration’ is linked to Articles further in the proposal • All definitions specifically linked to definitions adhered to in other existing environmental legislation • Urban green space also includes the total area of trees, bushes, shrubs, permanent herbaceous vegetation, lichens and mosses, ponds and watercourses • ‘renewables acceleration area’ instead of ‘renewables go-to area’ 	<p>Policy Coherence:</p> <ul style="list-style-type: none"> • Adds a Article that outlines the need to create synergies and be coherent with existing and ongoing legislation • Refer specifically to articles of other regulations where possible <p>National Restoration Plans:</p> <ul style="list-style-type: none"> • The timeline for finalization of the NRP takes 36 months • NRP should also consider the socio- economic impact especially on rural areas and the impact of the national restoration plan in particular on agricultural and forestry production in order to ensure that it does not result in production moving outside the Union • Include landowners, land managers, maritime stakeholders, local and regional authorities in the preparation of the plan <p>Financing:</p> <ul style="list-style-type: none"> • The financing of funding gaps in relation to the implementation of this Regulation shall be ensured without using any funding from the CAP, the CFP or other agricultural and fisheries funding streams • The Commission should, by 12 months from its entry into force and in consultation with Member States, present a report with an analysis identifying any gaps in implementing this Regulation. That report should be accompanied, where appropriate, by proposals for adequate measures, including financial measures to address the gaps identified

Document	Targets	Definitions	Implementation
Compromise & Final Position EP	<p>Type of targets:</p> <ul style="list-style-type: none"> • Time-bound quantitative targets • For agricultural ecosystems: does not include obligations <p>Target Coverage:</p> <ul style="list-style-type: none"> • Focus solely on degraded ecosystems • Article 4-5: 30% by 2030, 60% by 2040, 90% by 2050 (encourages to reach 100% restoration in Article 5) • Targets for urban areas indicative • Non-deterioration obligation for areas for which restoration measures have been taken and a good condition has been reached & protected areas limited to ‘significant’ deterioration • Member states get the ability to assess the condition of all habitat types until 2040 • Non-fulfillment of the obligations allowed in cases of natural disasters • Plans and projected related to renewable energy can be considered an overriding public interest • Clause added for military ground that can be considered as exception • Restoration of agricultural ecosystems needs to take into account climate change, the social and economic needs of rural areas, and the need to ensure sustainable agricultural production in the Union. <ul style="list-style-type: none"> • Decreasing targets and share that needs to be rewetted • Restoration on forest ecosystems is based on qualitative indexes • Planting of three billion additional trees 	<p>Added definition:</p> <ul style="list-style-type: none"> • “very common and widespread habitat type” • Native tree species • Urban centers and urban clusters • Peri-urban areas • Flee flowing river • Rewetting peatland <p>Altered definition:</p> <ul style="list-style-type: none"> • Linking definition of ‘habitat of a species’ to the definition adhered to in HD • ‘Restoration’ is linked to Articles further in the proposal • All definitions specifically linked to definitions adhered to in other existing environmental legislation • Urban green space also includes the total area of trees, bushes, shrubs, permanent herbaceous vegetation, lichens and mosses, ponds and watercourses • ‘renewables acceleration area’ instead of ‘renewables go-to area’ 	<p>Policy Coherence:</p> <ul style="list-style-type: none"> • Better coherence with: Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources, Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency • Refer specifically to articles of other regulations where possible <p>National Restoration Plans:</p> <ul style="list-style-type: none"> • The timeline for finalization of the NRP takes 36 months • Refers to ‘including all relevant stakeholders <p>Financing:</p> <ul style="list-style-type: none"> • The implementation of this Regulation shall not imply an obligation for Member States to re-programme any funding under the Common Agricultural Policy (CAP), the Common Fisheries Policy (CFP) or other agricultural and fisheries funding programmes and instruments under the multi-annual financial framework 2021-2027 • The Commission should, by 12 months from its entry into force and in consultation with Member States, present a report with an analysis identifying any gaps in implementing this Regulation. That report should be accompanied, where appropriate, by proposals for adequate measures, including financial measures to address the gaps identified

Note. Derived from the official EU documents: Council of the European Union, 2023b; European Commission, 2022; European Parliament, 2022c; European Parliament 2023f

Appendix D: Policy Issue I - Targets

Table 7

Preferences Targets

Interest Group	Preferences Targets:
<p>Joint statement of the non-energy extractive industry (source):</p> <p>Aggregates Europe (UEPG), Eurogypsum, European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines), European Ceramic Industry Association (Cerame-Unie) & European Expanded Clay Association (EXCA)</p>	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Assess targets case-by-case instead of predetermined targets - Change the legal act into a Directive <p>Target coverage:</p> <ul style="list-style-type: none"> - No position
<p>Joint Press Release of the agriculture and fisheries sector (source):</p> <p>Association of National Organisations of Fishing Enterprises in the European Union (Europêche), European Farmers (COPA) & European agri-cooperatives (COGECA)</p>	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Aim for rejection of the proposal and want the Commission to restart the process from the scratch <p>Target Coverage:</p> <ul style="list-style-type: none"> - Aim for rejection of the proposal and want the Commission to restart the process from the scratch
<p>Joint NGO position paper:</p> <p>Clientearth, European Environmental Bureau (EEB), Stichting BirdLife Europe (BirdLife Europe) & WWF European Policy Office (WWF EPO)</p>	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Urgently request to keep quantitative, ecosystem-specific, time-bound targets <p>Target Coverage:</p> <ul style="list-style-type: none"> - Want to increase the target coverage <ul style="list-style-type: none"> - Propose increasing the ambition level of the targets for the different milestones in Article 4 and 5 and make sure that the timeline reaches 100% by 2050 (and not only 90%) - The restoration targets for peatlands should be increased overall in relation to both timeframes and area - Add quantified, time- bound objectives defined for indicator-based targets (Art. 9(2) and Art. 10) - The proposal for the restoration of drained peatlands should be expanded to include other land uses beyond only agricultural use, such as forestry. - Restored areas must be added to the protected area network via legislation, an administrative act or contractual means to ensure long-term non-deterioration (entangle the non-deterioration obligations)

Confederation of European Paper Industries (CEPI)	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Wants to implement indicative, flexible targets <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - Habitat restoration and accompanying targets should focus on Natura 2000 network and protected areas - The nature restoration targets should be balanced towards wider societal targets
Eurelectric	<p>Type of Targets:</p> <ul style="list-style-type: none"> - No position <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - No position
<p>Living Rivers Europe coalition (source):</p> <p>European Anglers Alliance (EAA), European Environmental Bureau (EEB), The Nature Conservancy Europe (TNCE), Wetlands International - European Association (WI-EA) WWF European Policy Office (WWF EPO)</p>	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Urgently request to keep quantitative, ecosystem-specific, time-bound targets <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - Want to increase the target coverage <ul style="list-style-type: none"> - Raise the barrier removal target to 15% of EU river length (178,000 km) restored to a free-flowing state by 2030 - Increase the intermediary percentage targets laid out in Article 4 for the restoration and re-establishment of areas and the restoration of habitats of species, and shorten the timeline for reaching 100% - Extend the non-deterioration obligations should be extended to urban green space (Article 6), free-flowing rivers (Article 7) and the restoration of drained peatlands (Article 9(4)) - Non-deterioration obligation should be legally secured
European Construction Industry Federation (FIEC)	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Wants options that grant more flexibilities and exemptions for Member States and regions <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - Habitat restoration and accompanying targets should focus on Natura 2000 network and protected areas (non-deterioration should only apply to Natura 2000 network)
European Landowners' Organization (ELO)	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Shift to qualitative targets instead of focussing on quantitative targets - Targets need to be revised and clearly justified, while taking a more bottom-up approach <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - Habitat restoration and accompanying targets should focus on Natura 2000 network and protected areas - Want to add to the non-deterioration obligations that current and future climate change will inevitably cause change to certain habitats and that it is not possible to maintain all those habitats

<p>European State Forest Association (EUSTAFOR)</p>	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Targets need to be revised and clearly justified, while taking a more bottom-up approach <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - Do not adopt an amendment that aims for 100% restoration - Want to add a clause that current and future climate change will inevitably cause change to certain habitats and that it is not possible to maintain all those habitats
<p>Joint Marine NGO statement:</p> <p>Seas at Risk</p>	<p>Type of Targets:</p> <ul style="list-style-type: none"> - Urgently request to keep quantitative, ecosystem-specific, time-bound targets <p>Target Coverage/Breadth:</p> <ul style="list-style-type: none"> - Want to increase the target coverage <ul style="list-style-type: none"> - Improve the specific targets, the overarching restoration target must be understood to cover EU land and sea areas respectively, rather than in combination (i.e. at least 20% of EU land and 20% of EU sea areas by 2030). - Increase targets to 100% by 2050 - Restored areas must be added to the protected area network via legislation, an administrative act or contractual means to ensure long-term non-deterioration (entangle the non-deterioration obligations)

Note. Adapted from the position papers of the IG

Table 8*Preference Attainment Targets - Draft Report*

Coalition	Interest Group from sample	Type of Targets	Target Coverage	Total Score
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG	0/2	-	0/2
	Eurogypsum			
	Euromines			
	Cerame-Unie			
	EXCA			
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche	-	-	-
	COPA			
	COGECA			
Joint NGO position paper Size: 4 IG	Clientearth	2/2	1/2	3/4
	EEB			
	BirdLife Europe			
	WWF EPO			
Paper industry Size: 1 IG	CEPI	0/2	0/2	0/4
Electricity industry Size: 1 IG	Eurelectric	-	-	-
Living Rivers Europe coalition Size: 6 IG	EAA	2/2	1/2	3/4
	EEB			
	TNCE			
	WI-EA			
	WWF EPO			
Construction industry Size: 6 IG	FIEC	0/2	0/2	0/4
Agriculture industry Size: 1 IG	ELO	0/2	0/2	0/4
Forestry industry Size: 1 IG	EUSTAFOR	0/2	0/2	0/4
Joint Marine NGO statement: Size: 26	Seas at Risk	2/2	1/2	3/4

Table 9*Preference Attainment Targets - Final Report*

Coalition	Interest Group from sample	Type of Targets	Target Coverage	Total Score
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG	1/2	-	1/2
	Eurogypsum			
	Euromines			
	Cerame-Unie			
	EXCA			
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche	-	-	-
	COPA			
	COGECA			
Joint NGO position paper Size: 4 IG	Clientearth	0/2	0/2	0/4
	EEB			
	BirdLife Europe			
	WWF EPO			
Paper industry Size: 1 IG	CEPI	1/2	2/2	3/4
Electricity industry Size: 1 IG	Eurelectric	-	-	-
Living Rivers Europe coalition Size: 6 IG	EAA	0/2	0/2	0/4
	EEB			
	TNCE			
	WI-EA			
	WWF EPO			
Construction industry Size: 6 IG	FIEC	2/2	2/2	4/4
Agriculture industry Size: 1 IG	ELO	1/2	2/2	3/4
Forestry industry Size: 1 IG	EUSTAFOR	1/2	3/4	4/4
Joint Marine NGO statement: Size: 26	Seas at Risk	0/2	0/2	0/4

Table 10*Preference Attainment Targets - Final Outcome*

Coalition	Interest Group from sample	Type of Targets	Target Coverage	Total Score
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG	0/2	-	0/2
	Eurogypsum			
	Euromines			
	Cerame-Unie			
	EXCA			
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche	-	-	-
	COPA			
	COGECA			
Joint NGO position paper Size: 4 IG	Clientearth	2/2	0/2	2/4
	EEB			
	BirdLife Europe			
	WWF EPO			
Paper industry Size: 1 IG	CEPI	1/2	2/2	3/4
Electricity industry Size: 1 IG	Eurelectric	-	-	-
Living Rivers Europe coalition Size: 6 IG	EAA	2/2	0/2	2/4
	EEB			
	TNCE			
	WI-EA			
	WWF EPO			
Construction industry Size: 6 IG	FIEC	2/2	0/2	2/4
Agriculture industry Size: 1 IG	ELO	0/2	2/2	2/4
Forestry industry Size: 1 IG	EUSTAFOR	0/2	1/2	1/4
Joint Marine NGO statement: Size: 26	Seas at Risk	2/2	0/2	2/4

Appendix E: Policy Issue II - Definitions

Table 11

Preferences Definitions

Interest Group	Preferences Definitions and Alignment:
<p>Joint statement of the non-energy extractive industry (source):</p> <p>Aggregates Europe (UEPG), Eurogypsum, European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines), European Ceramic Industry Association (Cerame-Unie) & European Expanded Clay Association (EXCA)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Define ‘Habitat Area’ (Article 4(10)) - Include parameters for the definition of lands restored in ‘good condition’ (Article 3(4))
<p>Joint Press Release of the agriculture and fisheries sector (source):</p> <p>Association of National Organisations of Fishing Enterprises in the European Union (Europêche), European Farmers (COPA) & European agri-cooperatives (COGECA)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Aim for rejection of the proposal and want the Commission to restart the process from the scratch
<p>Joint NGO position paper:</p> <p>Clientearth, European Environmental Bureau (EEB), Stichting BirdLife Europe (BirdLife Europe) & WWF European Policy Office (WWF EPO)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Add a definition on which measures are ‘area-based’, or make sure that there is an explicit reference to Article 4,5,6 and 9(4) in Article 1(2) to ensure that only area-based targets contribute to the overarching area-based objective - Redefine what falls under ‘obsolete barriers’ and make sure that indeed only essential barriers are allowed to stay under strict conditions, do not leave room for interpretation
<p>Confederation of European Paper Industries (CEPI)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Specify a difference between ‘unknown condition’ and ‘not in a good condition’ (Article 4(4))
<p>Eurelectric</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Add a definitions for “good condition of ecosystem services” (regarding habitat conditions) and “baseline” (regarding assessments of these conditions) - Assess the definition of ‘obsolete’ case by case - Redefine ‘free flowing rivers’ and take into consideration that continuity of rivers might in many cases also be impaired by natural barriers, such as those built by beavers.

<p>Living Rivers Europe coalition (source):</p> <p>European Anglers Alliance (EAA), European Environmental Bureau (EEB), The Nature Conservancy Europe (TNCE), Wetlands International - European Association (WI-EA) WWF European Policy Office (WWF EPO)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Redefine what falls under ‘obsolete barriers’ and make sure that indeed only essential barriers are allowed to stay under strict conditions, do not leave room for interpretation - Change the name to “urban green and blue space” and also include wetlands in the definition in Article 3(13).
<p>European Construction Industry Federation (FIEC)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - No position
<p>European Landowners' Organization (ELO)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Add a definition on ‘passive restoration’ - Redefine ‘favorable reference area’ so that it takes into account that some ecosystems are not longer fit to ensure long-term resilience due to changing climatic conditions
<p>European State Forest Association (EUSTAFOR)</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Define clearly what needs to be restored using clear definitions of ‘restoration’
<p>Joint Marine NGO statement: Seas at Risk</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - Include a definition that shows the interlinkage between freshwater, coastal and marine ecosystems (Articles 4 and 5)

Note. Adapted from the position papers of the IG

Table 12*Preference Attainment Definitions - Draft Report*

Coalition	Interest Group	Amount of definitions adopted as part of suggested definitions
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG Eurogypsum Euromines Cerame-Unie EXCA	0/1
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche COPA COGECA	-
Joint NGO position paper Size: 4 IG	Clientearth EEB BirdLife Europe WWF EPO	0/2
Paper industry Size: 1 IG	CEPI	0/1
Electricity industry Size: 1 IG	Eurelectric	0/3
Living Rivers Europe coalition Size: 6 IG	EAA EEB TNCE WI-EA WWF EPO	0/2
Construction industry Size: 6 IG	FIEC	-
Agriculture industry Size: 1 IG	ELO	1/2
Forestry industry Size: 1 IG	EUSTAFOR	0/1
Joint Marine NGO statement: Size: 26	Seas at Risk	1/1

Table 13*Preference Attainment Definitions - Final Report*

Coalition	Interest Group	Amount of definitions adopted as part of suggested definitions
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG Eurogypsum Euromines Cerame-Unie EXCA	1/2
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche COPA COGECA	-
Joint NGO position paper Size: 4 IG	Clientearth EEB BirdLife Europe WWF EPO	0/2
Paper industry Size: 1 IG	CEPI	1/1
Electricity industry Size: 1 IG	Eurelectric	3/3
Living Rivers Europe coalition Size: 6 IG	EAA EEB TNCE WI-EA WWF EPO	1/2
Construction industry Size: 6 IG	FIEC	-
Agriculture industry Size: 1 IG	ELO	0/2
Forestry industry Size: 1 IG	EUSTAFOR	1/1
Joint Marine NGO statement: Size: 26	Seas at Risk	0/1

Table 14*Preference Attainment Definitions - Final Outcome*

Coalition	Interest Group	Amount of definitions adopted as part of suggested definitions
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG Eurogypsum Euromines Cerame-Unie EXCA	1/2
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche COPA COGECA	-
Joint NGO position paper Size: 4 IG	Clientearth EEB BirdLife Europe WWF EPO	0/2
Paper industry Size: 1 IG	CEPI	1/1
Electricity industry Size: 1 IG	Eurelectric	3/3
Living Rivers Europe coalition Size: 6 IG	EAA EEB TNCE WI-EA WWF EPO	1/2
Construction industry Size: 6 IG	FIEC	-
Agriculture industry Size: 1 IG	ELO	0/2
Forestry industry Size: 1 IG	EUSTAFOR	1/1
Joint Marine NGO statement: Size: 26	Seas at Risk	0/1

Appendix F: Policy Issue III: Implementation

Table 15

Preferences Implementation

Interest Group	Preferences Implementation
<p>Joint statement of the non-energy extractive industry (source):</p> <p>Aggregates Europe (UEPG), Eurogypsum, European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines), European Ceramic Industry Association (Cerame-Unie) & European Expanded Clay Association (EXCA)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Remove inconsistencies between restoration goals in the current proposal (>20% nature restoration goal for 2030) and the EU Biodiversity Strategy for 2030 (30% nature protection target). - Clarify the link between the proposal, the Habitats Directive, the Marine Strategy Framework Directive, and the Biodiversity Strategy for 2030 as these different instruments have different legal weights and use different legal terms. <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Ensure concrete bottom-up implications of local stakeholders when it comes to Member States elaborating their NRP <p>Financing:</p> <ul style="list-style-type: none"> - No position
<p>Joint Press Release of the agriculture and fisheries sector (source):</p> <p>Association of National Organisations of Fishing Enterprises in the European Union (Europêche), European Farmers (COPA) & European agri-cooperatives (COGECA)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Aim for rejection of the proposal and want the Commission to restart the process from the scratch <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Aim for rejection of the proposal and want the Commission to restart the process from the scratch <p>Financing:</p> <ul style="list-style-type: none"> - Aim for rejection of the proposal and want the Commission to restart the process from the scratch

<p>Joint NGO position paper:</p> <p>Clientearth, European Environmental Bureau (EEB), Stichting BirdLife Europe (BirdLife Europe) & WWF European Policy Office (WWF EPO)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Remove the highlight given to exemptions to the Water Framework Directive and TEN-T regulation to ensure proper implementation <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Art. 11(11) also needs to be expanded, including by setting adequate consultation timelines and effectively informing the most relevant public stakeholders, to ensure compliance with Art. 7 of the Aarhus Convention. - Shorten the timeline for the finalization of NRP to two years overall - National Restoration Plans should (under Art. 12(2)(b)) include an explanation on how the restoration measures adopted are additional to those that Member States are already legally required to adopt under the existing environmental acquis (particularly the Birds, Habitats and Water Framework Directives). To ensure the additionality of restoration measures <p>Financing:</p> <ul style="list-style-type: none"> - The EC should assess existing EU funding support available for nature restoration and explore options to expand these, for example through the establishment of dedicated funding for nature restoration, pursuant to the mid-term review of the Multiannual Financial Framework.
<p>Confederation of European Paper Industries (CEPI)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - No position <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Ensure public participation during the development of the NRP - Include social and economic impact in the NRP <p>Financing:</p> <ul style="list-style-type: none"> - No position
<p>Eurelectric</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Include the revised Renewable Energy Directive into the NRL <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Indicators attached to these plans should be designed at an EU-level to avoid disparities <p>Financing:</p> <ul style="list-style-type: none"> - Member States should provide adequate financing for their removal of 'obsolete barriers'

<p>Living Rivers Europe coalition (source):</p> <p>European Anglers Alliance (EAA), European Environmental Bureau (EEB), The Nature Conservancy Europe (TNCE), Wetlands International - European Association (WI-EA) WWF European Policy Office (WWF EPO)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Remove the highlight given to exemptions to the Water Framework Directive and TEN-T regulation to ensure proper implementation. - The restoration targets for agricultural ecosystems of 30%, 50% and 70% by 2030, 2040, 2050, respectively, should be significantly increased to align these targets with the requirements of the Paris Agreement and the intentions expressed in the EU Biodiversity Strategy which prioritises those habitats with the greatest potential to capture and store carbon <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Art. 11(11) also needs to be expanded, including by setting adequate consultation timelines and effectively informing the most relevant public stakeholders, to ensure compliance with Art. 7 of the Aarhus Convention. - Shorten the timeline for the finalization of NRP to two years - National Restoration Plans should (under Art. 12(2)(b)) include an explanation on how the restoration measures adopted are additional to those that Member States are already legally required to adopt under the existing environmental acquis (particularly the Birds, Habitats and Water Framework Directives). To ensure the additionality of restoration measures <p>Financing:</p> <ul style="list-style-type: none"> - The EC should assess existing EU funding support available for nature restoration and explore options to expand these, for example through the establishment of dedicated funding for nature restoration, pursuant to the mid-term review of the Multiannual Financial Framework.
<p>European Construction Industry Federation (FIEC)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Ensure compatibility with the objectives of the the Soil Strategy for 2030 <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - No position <p>Financing:</p> <ul style="list-style-type: none"> - No position
<p>European Landowners' Organization (ELO)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Ensure that there is alignment between the Kunming Montreal Global Biodiversity Framework (GBF) and Article 4 of the proposal <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - In the preparation of a NRP, Member States shall do a through and broad socio economic impact assessment by focussing on: the impact on the overall economy, development of workforce, the rural economy, especially on sectors such as agricultural, forestry, fisheries, construction and energy production <p>Financing:</p> <ul style="list-style-type: none"> - Include compensation schemes for possible property-related disadvantages and yield losses

<p>European State Forest Association (EUSTAFOR)</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Ensure that there is alignment between the Kunming Montreal Global Biodiversity Framework (GBF) and Article 4 of the proposal <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Ensure that the expertise of state forest managers as custodians of Europe’s public forests will be adequately recognized in the upcoming national restoration plans <p>Financing:</p> <ul style="list-style-type: none"> - Ensure that there is appropriate funding for Member States to achieve the targets
<p>Joint Marine NGO statement:</p> <p>Seas at Risk</p>	<p>Policy Coherence:</p> <ul style="list-style-type: none"> - Extend the scope of the marine species and habitats covered in the NRL Annexes to improve the diversity and richness of marine ecosystems, notably by including vulnerable and endangered marine species currently protected under EU laws, Regional Sea conventions (e.g. Barcelona Convention, HELCOM, OSPAR) and international conventions (e.g., Convention on Migratory Species, Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)) <p>National Restoration Plans:</p> <ul style="list-style-type: none"> - Art. 11(11) also needs to be expanded, including by setting adequate consultation timelines and effectively informing the most relevant public stakeholders, to ensure compliance with Art. 7 of the Aarhus Convention. - Shorten the timeline for the finalization of NRP to two years - National Restoration Plans should (under Art. 12(2)(b)) include an explanation on how the restoration measures adopted are additional to those that Member States are already legally required to adopt under the existing environmental acquis (particularly the Birds, Habitats and Water Framework Directives). To ensure the additionality of restoration measures <p>Financing:</p> <ul style="list-style-type: none"> - The EC should assess existing EU funding support available for nature restoration and explore options to expand these, for example through the establishment of dedicated funding for nature restoration, pursuant to the mid-term review of the Multiannual Financial Framework.

Note. Adapted from the position papers of the IG

Table 16*Preference Attainment Implementation - Draft Report*

Coalition	Interest Group	Policy Coherence	National Restoration Plans	Financing	Total Score
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG Eurogypsum Euromines Cerame-Unie EXCA	2/2	2/2	-	4/4
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche COPA COGECA	-	-	-	-
Joint NGO position paper Size: 4 IG	Clientearth EEB BirdLife Europe WWF EPO	2/2	1/2	2/2	5/6
Paper industry Size: 1 IG	CEPI	-	1/2	-	1/2
Electricity industry Size: 1 IG	Eurelectric	0/2	0/2	0/2	0/6
Living Rivers Europe coalition Size: 6 IG	EAA EEB TNCE WI-EA WWF EPO	2/2	1/2	2/2	5/6
Construction industry Size: 6 IG	FIEC	0/2	-	-	0/2
Agriculture industry Size: 1 IG	ELO	0/2	0/2	0/2	0/6
Forestry industry Size: 1 IG	EUSTAFOR	0/2	2/2	2/2	4/6
Joint Marine NGO statement: Size: 26	Seas at Risk	0/2	1/2	2/2	3/6

Table 17*Preference Attainment Implementation - Final Report*

Coalition	Interest Group	Policy Coherence	National Restoration Plans	Financing	Total Score
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG Eurogypsum Euromines Cerame-Unie EXCA	0/2	2/2	-	2/4
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche COPA COGECA	-	-	-	-
Joint NGO position paper Size: 4 IG	Clientearth EEB BirdLife Europe WWF EPO	0/2	0/2	2/2	2/6
Paper industry Size: 1 IG	CEPI	-	2/2	-	2/2
Electricity industry Size: 1 IG	Eurelectric	2/2	2/2	0/2	4/6
Living Rivers Europe coalition Size: 6 IG	EAA EEB TNCE WI-EA WWF EPO	0/2	0/2	2/2	2/6
Construction industry Size: 6 IG	FIEC	2/2	-	-	2/2
Agriculture industry Size: 1 IG	ELO	2/2	2/2	2/2	6/6
Forestry industry Size: 1 IG	EUSTAFOR	2/2	2/2	2/2	6/6
Joint Marine NGO statement: Size: 26	Seas at Risk	0/2	0/2	2/2	2/6

Table 18*Preference Attainment Implementation - Final Outcome*

Coalition	Interest Group	Policy Coherence	National Restoration Plans	Financing	Total Score
Joint statement of the non-energy extractive industry Size: 5 IG	UEPG Eurogypsum Euromines Cerame-Unie EXCA	0/2	0/2	-	0/4
Joint Press Release of the agriculture and fisheries sector Size: 3 IG	Europêche COPA COGECA	-	-	-	-
Joint NGO position paper Size: 4 IG	Clientearth EEB BirdLife Europe WWF EPO	0/2	1/2	2/2	3/6
Paper industry Size: 1 IG	CEPI	-	1/2	-	1/2
Electricity industry Size: 1 IG	Eurelectric	0/2	2/2	0/2	2/6
Living Rivers Europe coalition Size: 6 IG	EAA EEB TNCE WI-EA WWF EPO	0/2	1/2	2/2	3/6
Construction industry Size: 6 IG	FIEC	2/2	-	-	2/2
Agriculture industry Size: 1 IG	ELO	2/2	2/2	2/2	2/6
Forestry industry Size: 1 IG	EUSTAFOR	2/2	0/2	2/2	4/6
Joint Marine NGO statement: Size: 26	Seas at Risk	0/2	1/2	2/2	3/6

Appendix G: Scores Total Preference Attainment per Phase

Table 19

Total Preference Attainment - Draft Report

Coalition/Individual IG	IG from sample	Targets	Definitions	Implementation	Total Score
Coalition Size: 5 IG	UEPG	0/2	0/2	4/4	4/8
	Eurogypsum				
	Euromines				
	Cerame-Unie				
	EXCA				= 50%
Coalition Size: 3 IG	Europêche	-	-	-	-
	COPA				
	COGECA				
Coalition Size: 4 IG	Clientearth	3/4	0/2	5/6	8/12
	EEB				
	BirdLife Europe				
	WWF EPO				= 66,7%
Individual IG	CEPI	0/4	0/1	1/2	1/7 = 14,3%
Individual IG	Eurelectric	-	0/3	0/6	0/9 = 0%
Coalition Size: 6 IG	EAA	3/4	0/2	5/6	8/12
	EEB				
	TNCE				
	WI-EA				
	WWF EPO				= 66,7%
Coalition Size: 6 IG	FIEC	0/4	-	0/6	0/10 = 0%
Individual IG	ELO	0/4	1/2	0/6	1/12 = 8,33%
Individual IG	EUSTAFOR	0/4	0/1	4/6	4/11 = 36,4%
Coalition Size: 26	Seas at Risk	3/4	1/1	3/6	7/11 = 63,6%

Table 20

Total Preference Attainment - Final Report

Coalition/Individual IG	IG from sample	Targets	Definitions	Implementation	Total Score
Coalition Size: 5 IG	UEPG	1/2	1/2	2/4	4/8
	Eurogypsum				
	Euromines				
	Cerame-Unie				
	EXCA				= 50%
Coalition Size: 3 IG	Europêche	-	-	-	-
	COPA				
	COGECA				
Coalition Size: 4 IG	Clientearth	0/4	0/2	2/6	2/12
	EEB				
	BirdLife Europe				
	WWF EPO				= 16,7%
Individual IG	CEPI	3/4	1/1	2/2	7/7 = 100%
Individual IG	Eurelectric	-	3/3	4/6	7/9 = 77,8%
Coalition Size: 6 IG	EAA	0/4	1/2	2/6	3/12
	EEB				
	TNCE				
	WI-EA				
	WWF EPO				= 25%
Coalition Size: 6 IG	FIEC	4/4	-	2/6	6/10 = 60%
	ELO	3/4	0/2	6/6	9/12 = 75%
Individual IG	EUSTAFOR	4/4	1/1	6/6	11/11 = 100%
Coalition Size: 26	Seas at Risk	0/4	0/1	2/6	2/11 = 18,2%

Table 21

Total Preference Attainment - Final Outcome

Coalition/Individual IG	IG from sample	Targets	Definitions	Implement- ation	Total Score
Coalition Size: 5 IG	UEPG	0/2	1/2	1/4	2/8
	Eurogypsum				
	Euromines				
	Cerame-Unie				
	EXCA				= 25%
Coalition Size: 3 IG	Europêche	-	-	-	-
	COPA				
	COGECA				
Coalition Size: 4 IG	Clientearth	2/4	0/2	3/6	5/12
	EEB				
	BirdLife Europe				
	WWF EPO				= 41,7%
Individual IG	CEPI	3/4	1/1	1/2	5/7 = 71,4%
Individual IG	Eurelectric	-	3/3	2/6	5/9 = 55%
Coalition Size: 6 IG	EAA	2/4	1/2	3/6	6/12
	EEB				
	TNCE				
	WI-EA				
	WWF EPO				= 50%
Coalition Size: 6 IG	FIEC	2/4	-	2/6	4/10 = 40%
	ELO	2/4	0/2	2/6	4/12 = 33,3%
Individual IG	EUSTAFOR	1/4	1/1	4/6	6/11 = 54,5%
Coalition Size: 26	Seas at Risk	2/4	0/1	3/6	5/11 = 45,5%

Appendix H: IG preferences Reflected in the Amendments

Table 22

Preferences Reflected in Amendments - Draft Report

IG	Preferences reflected in amendment No. X
Copa & Cogega, Europêche	-
ELO	46, 49, 143, 163
UEPG, Cerame-Unie, Euro Gypsum, Euromines, EXCA	46, 143, 163
FIEC	-
CEPI	143, 163
Eustafor	143, 163
Eurelectric	-
BirdLife Europe, ClientEarth, EEB, WWF EPO	46, 51, 53, 55, 56, 57, 58, 59, 61, 63, 64, 67, 69, 70, 72, 73, 74, 76, 77, 82, 87, 131, 132, 135, 137, 163
Seas at Risk	49, 55, 56, 57, 58, 59, 61, 63, 67, 69, 70, 72, 73, 74, 76, 77, 98, 110, 131, 132, 135, 137, 163
EEA, EEB, TNCE, WI-EA, WWF EPO	51, 55, 56, 57, 58, 59, 61, 63, 69, 70, 72, 73, 74, 76, 82, 90, 91, 92, 108, 118, 131, 132, 135, 137, 163

Note. Adapted from European Parliament 2022c

Table 23*Preferences Reflected in Amendments - Final Report*

IG	Preferences reflected in new article X or amendment X
Copa & Cogega, Europêche	-
ELO	1(1a), 4(1), 4(6), 4(8a), 5(8a), Am. 125/rev1, Ams. 25,101 and 121, 11(1), 11(2a), 11(11), 18(6a)
UEPG, Cerame-Unie, Euro Gypsum, Euromines, EXCA	1(2a), 3(6), 4(1), 11(1), 11(11)
FIEC	1(2a), 4(1), 4(6), 5(8a), Am. 125/rev1, Ams. 25,101 and 121,
CEPI	4(1), 4(4a), 4(10a), Am. 129/rev1, Am. 130/rev1, 10(2a), 11(1), 11(2ba), 11(11)
Eustafor	1(2a), 3(3), 4(8a), Am. 125/rev1, Ams. 25,101 and 121, Am. 129/rev1, Am. 130/rev1, 10(2a), 10(3a), 11(11), 18(6a)
Eurelectric	1(1a), 3(14a), 5a, 7(1), 11(11)
BirdLife Europe, ClientEarth, EEB, WWF EPO	7(4), 11(11), 18(6a)
Seas at Risk	11(11), 18(6a)
EEA, EEB, TNCE, WI-EA, WWF EPO	7(2), 7(4), 11(11), 18(6a)

Note. Adapted from European Parliament 2023f

Table 24*Preferences Reflected in Amendments - Final Outcome*

IG	Preferences reflected in new article X
Copa & Cogega, Europêche	-
ELO	4(1), 9(1), 11(9a), 18(6a)
UEPG, Cerame-Unie, Euro Gypsum, Euromines, EXCA	3(4)
FIEC	4(1), 4(2), 6(2)
CEPI	4(1), 4(2), 4(4a), 11(9a)
Eustafor	3(3), 10(2), 18(6a)
Eurelectric	5a, 7(1), 11(6),
BirdLife Europe, ClientEarth, EEB, WWF EPO	4(1), 5(1), 11(11), 18(6a)
Seas at Risk	4(1), 5(1), 11(11), 18(6a)
EEA, EEB, TNCE, WI-EA, WWF EPO	4(1), 5(1), 7(2), 7(3a), 11(11), 18(6a)

Note. Adapted from European Parliament 2024a

Appendix I: Documented Meetings Between IG and Key MEPs

Table 25

IG Providing Input to the Rapporteur for the Draft Report

IG	Meeting with Key MEP
BirdLife Europe	Cesar Luena
The Nature Conservancy	Cesar Luena
Oceana	Cesar Luena
Wetlands International - European Association	Cesar Luena
Confederation of European Paper Industries (CEPI)	Cesar Luena
European Anglers Alliance (EAA)	Cesar Luena

Note. Derived from the MEPs meetings database. European Parliament (n.d.b.)

Table 26

Meetings with Key MEPs ENVI and IG - Phase I

IG	Meeting with Key MEP	Date of the meeting
SEO/BirdLife	Cesar Luena	08-09-2022
Copa Cogeca	Christine Schneider	28-09-2022
European Landowners (ELO)	Christine Schneider	12-10-2022
The Nature Conservancy	Cesar Luena	13-10-2022
OCEANA	Cesar Luena	25-10-2022
Wetlands International - European Association	Cesar Luena	26-10-2022
The nature Conservancy	Jutta Paulus	09-11-2022
Wetlands International - European Association	Cesar Luena	17-11-2022
OCEANA	Mick Wallace	01-12-2022

Note. Derived from the MEPs meetings database. European Parliament (n.d.b.)

Table 27*Meetings with Key MEPs ENVI and IG - Phase II*

IG	Meeting with Key MEP	Date of the meeting
WWF European Policy Programme	Jutta Paulus	06-12-2022
EEB	Jutta Paulus	06-12-2022
Copa Cogeca	Christine Schneider	08-12-2022
Europeche	Cesar Luena	18-01-2023

Note. Derived from the MEPs meetings database. European Parliament (n.d.b.)

Table 28*Meetings with Key MEPs ENVI and IG - Phase III*

IG	Meeting with Key MEP	Date of the meeting
European Construction Industry Federation (CEPI)	Christine Schneider	28-03-2023
Euromines	Christine Schneider	25-04-2023
UEPG	Christine Schneider	25-04-2023
European Landowners (ELO)	Christine Schneider	23-05-2023
Euromines	Cesar Luena	15-06-2023
ClientEarth	Cesar Luena	19-09-2023
Seas At Risk	Cesar Luena	20-09-2023
WWF European Policy Programme (WWF EPO)	Cesar Luena	26-10-2023
ClientEarth	Cesar Luena	15-02-2024

Note. Derived from the MEPs meetings database. European Parliament (n.d.b.)

Table 29*Meetings with Key MEPs AGRI and IG - Phase I, II & III*

IG	Meeting with Key MEP	Date of the meeting
Confederation of European Paper Industries (CEPI)	Anne Sander	07-12-2022
Confederation of European Forest Owners (Eustafor)	Anne Sander	07-12-2022
WWF European Policy Programme (WWF EPO)	Anne Sander	05-01-2023
European Landowners (ELO)	Anne Sander	25-01-2023

Note. Derived from the MEPs meetings database. European Parliament (n.d.b.)