Policy brief

Access Imbalance in EU Environmental Policymaking

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All about the environment?

"The EU is all for environmental advocacy. It just doesn't want to pay for it anymore." — POLITICO, November 2024

Since the beginning of the second von der Leyen Commission's term in 2024, EU climate and environmental policy has become a hotly contested topic. Amidst farmers' protests around Europe, the subsequent 'greenlash' and turn to the right in the European elections, NGOs and civil society face a sharply less favourable political environment. Recent research also shows how the rise of the far right is reshaping relations between interest groups and EU policymakers, with organisations navigating tensions between ideological commitments and strategic access to political power.[ii] These developments mirror broader international trends, including increasing polarisation around climate policy in major global actors such as the United States (US).[iii]

On the one hand, NGOs' legitimacy is increasingly called into question by dominant political actors. This is illustrated most sharply by the debate about EU funding for (environmental) NGOs. The LIFE programme – the EU's financing scheme for environmental projects and a key source of funds for many NGOs – helps to level the playing field among lobby groups and ensure representation of different stakeholders within the EU, as resources shape organisations' ability to engage with policymakers. Yet, in 2025, right-wing parties pushed for a stop to funding of environmental NGOs lobbying the Commission, claiming that EU funds were being misused. Although NGOs' activities were cleared by the European Court of Auditors and the Commission itself, in 2025 the European Parliament voted to establish a Scrutiny Working Group on NGO financing, causing pushback from civil society organisations and left-wing political parties alike.

On the other hand, highly publicised examples highlight the seemingly growing dominance of corporate lobbying and influence on EU environmental policies in the new era of international competitiveness and simplification. From the replacement of public consultation with industry rountables in the corporate reporting Omnibus, to the influence of US Tech companies on the digital Omnibus, and most recently exaggerated corporate opposition to reforms of the EU Emissions Trading System, corporations seem to be pulling the strings in the implementation of European Green Deal policies. Corporate Europe Observatory figures indicate that only 5% of Commission meetings in the first year of the the Clean Industrial Deal were held with NGOs, while business interests represented over 90% of meetings.

But to what extent do these reflect a real shift in consultation practices from the first to the second von der Leyen Commission – and what should be done about it? This policy brief draws on data collected as part of the ACCESS4ALL project to examine to what extent these public examples can be generalised to an overall shift in how the Commission consults with stakeholders, and who gets to speak to decision-makers when environmental rules are written.

Why does balanced consultation matter?

Policy and academic research highlights that broad stakeholder consultation can improve both the *quality* of legislation, by providing technical expertise to improve policies, and *public trust and acceptance* of legislation. Consulting with a range of stakeholders allows different groups of people who may benefit or be harmed by legislation to provide input, which can reduce delays and problems later down the line.[iv]

Beyond that, though, the EU itself has the specific goal to increase and balance stakeholder input to ensure the quality of legislation and public buy-in. The Commission's 2021 Better Regulation Guidelines explicitly link stakeholder consultation to trust among EU citizens, arguing that "Consulting stakeholders is an important means of cllecting evidence to support policymaking…improv[ing] our understanding of the issues at stake and lead[ing] to better quality and credibility (and therefore acceptance and trust among EU citizens) of policy initiatives." The Commission itself notes that if left alone, stakeholder representation will tend to be skewed (due to the higher resources and structural power of economic interests): the 2025 Better Regulation Toolbox mentions the need for targeted stakeholder consultations to 'ensure balanced stakeholder representation'. Similarly, in a 2021 letter signed by MEPs around balanced stakeholder representation in sustainable finance, MEPs highlight that NGO funding enables public participation to "safeguard the public interest and provide expertise".

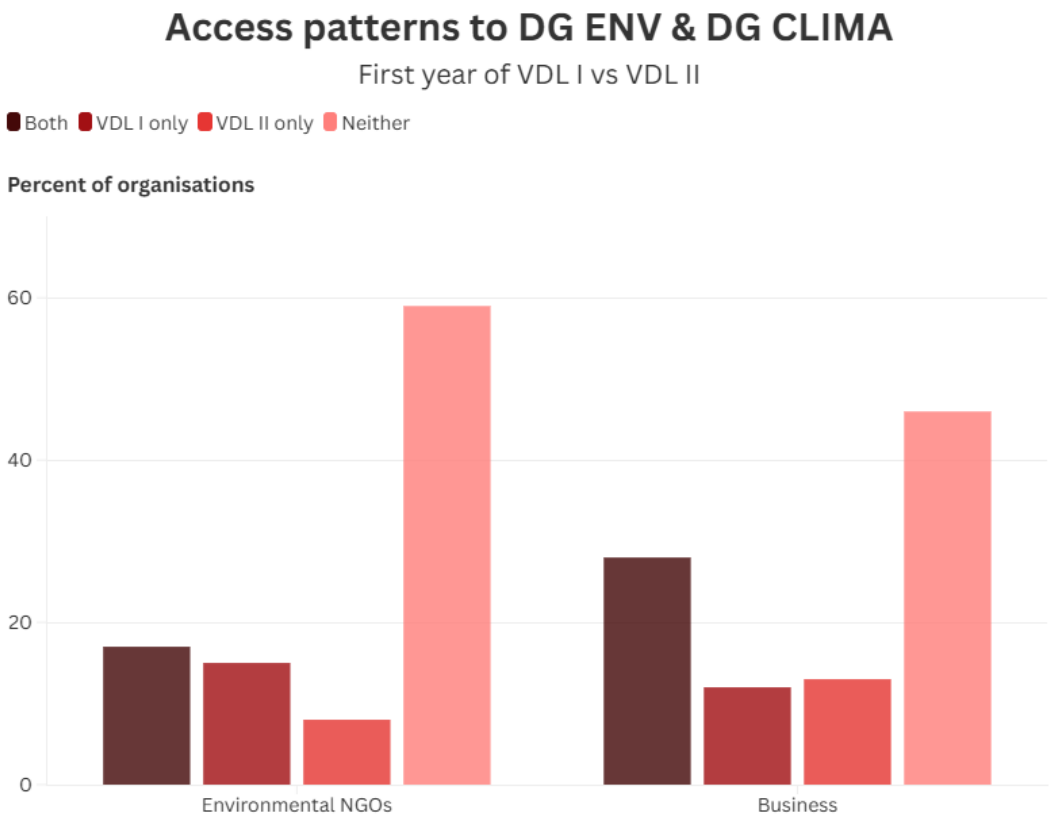
Yet, while organising a range of types of consultations are important in achieving balance, it also matters who gets to talk to policymakers outside of these organised mechanisms – which risks introducing extra levels of bias in the system. We dig deeper into the patterns of access to the European Commission across the two terms of the Von der Leyen Commission. Specifically, we rely on data from the EU Transparency Register (February 2025), focusing on all organisations that declare interests in environmental and climate policy. These data are linked to publicly available European Commission meeting records for DG Climate Action and DG Environment, allowing us to compare stakeholder access in the first year of the von der Leyen Commission's first mandate (VDL I) and second mandate (VDL II).[v] We therefore draw on data from over 8,500 organisations in the EU Transparency Register.

What do we observe?

1. Unequal access between environmental NGOs and business actors

Recent debates have raised concerns about the growing prominence of corporate actors in EU environmental policymaking, alongside the more limited role of environmental NGOs. Our data provide further evidence of this imbalance, showing clear differences in access to the European Commission between environmental NGOs and business actors (Figure 1).

Figure 1. Stakeholder access to DG Environment and DG Climate Action



*Notes: 1) These numbers are based on environmental NGOs and business organisations in the EU Transparency Register (February 2025). 2) Access is defined as at least one recorded meeting with DG Environment or DG Climate Action during the first year of each Commission mandate.

Looking across the first years of the von der Leyen Commission's two mandates (VDL I and VDL II), distinct access patterns can be identified, capturing whether organisations gain, lose, maintain, or lack access over time (Figure 1). These patterns show that:

- Environmental NGOs have lost ground. A larger share of NGOs had meetings only during VDL I than only during VDL II, while nearly six in ten had no recorded access in either period. Only 17% maintained access across both mandates, indicating that stable insider access is limited to a relatively small group of civil society organisations.

- By contrast, business actors display a more stable and stronger access profile. They are more likely to gain access in VDL II than to lose it, and more than one quarter maintained access across both mandates. Business actors are also substantially less likely than environmental NGOs to have no recorded access at all.

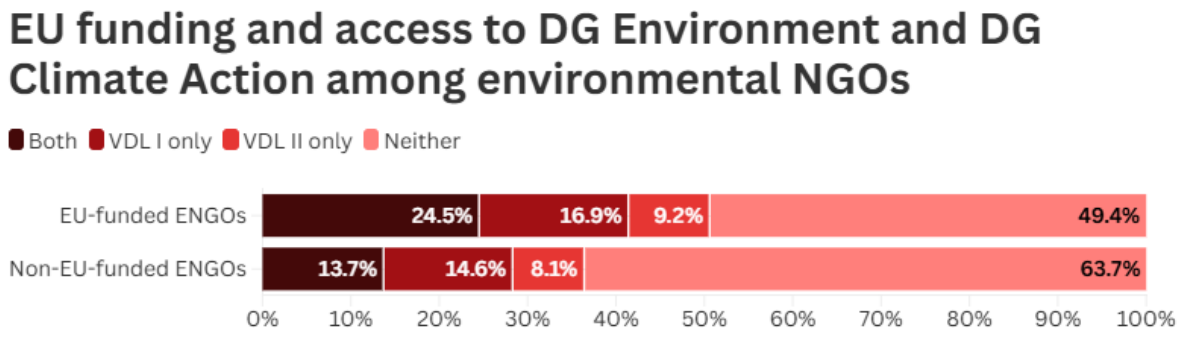
Taken together, these findings point to a widening gap in access between civil society and business interests. This pattern is consistent with broader concerns about the dominant role of corporate actors in shaping EU environmental policy, particularly in the context of the European Green Deal's implementation and the current emphasis on competitiveness and simplification.

2. EU funding matters

Looking specifically at environmental NGOs, we find that the decline in access is not evenly distributed. Previous research has shown that financial resources and staff capacity are important for lobbying success in EU climate policymaking.[vi] Building on this, we find that differences in access are closely linked to whether organisations receive EU funding, such as support through programmes like LIFE, which aim to support civil society participation in EU policymaking (Figure 2).

Specifically, environmental NGOs that receive EU funding are significantly more likely to maintain stable access to the Commission across mandates than those that do not. Nearly one quarter of EU-funded organisations retained access in both VDL I and VDL II, compared to fewer than 14% of non-funded NGOs (Figure 2). By contrast, non-EU-funded organisations are much more likely to have no recorded access at all and face a considerably steeper decline in access between VDL I and VDL II (Figure 2). This suggests that organisations without EU funding—and therefore without the institutional support mechanisms that programmes like LIFE provide—are more vulnerable in an increasingly restrictive access environment.

Figure 2. EU Funding and Access to DG Environment and DG Climate Action among environmental NGOs



*Notes: 1) These numbers are based on environmental NGOs in the EU Transparency Register (February 2025). 2) EU funding refers to receiving EU grants in the closed financial year. 3) Access is defined as at least one recorded meeting with DG Environment or DG Climate Action during the first year of each Commission mandate.

These findings are directly relevant to the current political debate on EU funding for environmental NGOs. While some political actors argue that such funding distorts lobbying, the evidence suggests the opposite: EU funding helps sustain NGOs' access to policymakers and supports their continued participation in EU decision-making. In this sense, programmes like LIFE appear to contribute to levelling the playing field among interest groups, rather than skewing it.

Policy recommendations

Our findings show that EU funding plays an important role in sustaining environmental NGOs' access to the European Commission. In a context where funding has come under increasing political pressure and overall access for NGOs is declining, this has important implications for both participation and the balance of stakeholder representation. The EU should therefore maintain broad consultation practices by systematically engaging a range of actors across business and civil society, with attention to the following points:

1. Safeguard funding to ensure continued participation

Reductions in EU funding risk further limiting NGOs' ability to engage with EU institutions. As resources shape organisations' ability to maintain a presence in policymaking, continued cuts are likely to reduce the participation of civil society actors.

The European Commission should therefore maintain or strengthen EU funding programmes for environmental NGOs – including the LIFE programme – to ensure their continued participation in EU decision-making.

2. Use targeted consultation to reach non-funded organisations

While EU funding supports participation, relying too heavily on funded organisations risks narrowing the range of voices included in consultations to larger, well-resourced civil society organisations. This may create a perception of "in-house" expertise and undermine balanced stakeholder representation.

The European Commission should ensure that access to policymakers and participation in consultations is not limited to EU-funded organisations. Targeted consultations should actively include smaller NGOs, not funded by the EU, to preserve a diversity of perspectives.

3. Combat anti-NGO narratives

We see the growing use of anti-NGO narratives, particularly from the of the political spectrum in the European Parliament. These are used to justify the questioning of and reduction of funding to NGOs, despite a lack of supporting evidence.

The European Commission should thus actively push back against these anti-NGO narratives. While this may lead to some political pushback, it is a necessary step to maintaining these funding streams and broad political participation of civil society – elements that are valued in the Commission's own documents and guidelines.

Stakeholder consultation is key to ensuring the quality and acceptance of EU policies, and the EU has worked to develop a consultation regime that enables balanced representation. Yet, these findings show that in the context of an increasingly hostile environment for civil society, NGOs' access has decreased, while business organisations' access has remained stable. The mitigating effect of funding that we find indicates the need to safeguard this funding and maintain strong consultative practices – especially in a time of heightened political contestation of climate and environmental policies.

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[i] Funding for the research behind this policy brief was provided by The Dutch Research Council (NWO) – VIDI scheme (grant nr. VI.Vidi.221R.036).

[ii] Vande Walle, B., Bruycker, I. D., Martinez-Böhme, S., & Eiselt, S. (2026). Friends of the far right? Interest group behaviour in the European Parliament. *West European Politics*, 1–29. https://doi.org/10.1080/01402382.2026.2741326

[iii] Dickson, Z. P., & Hobolt, S. B. (2025). Going Against the Grain: Climate Change as a Wedge Issue for the Radical Right. *Comparative Political Studies*, 58(8), 1733–1759. https://doi.org/10.1177/00104140241271297 ; Huber, R. A., Maltby, T., Szulecki, K., & Ćetković, S. (2021). Is populism a challenge to European energy and climate policy? Empirical evidence across varieties of populism. *Journal of European Public Policy*, 28(7), 998–1017. https://doi.org/10.1080/13501763.2021.1918214; Colgan, J., & Genovese, F. (2025). Global Climate Politics after the Return of President Trump. *International Organization*, 79(S1), S88–S102. https://doi.org/10.1017/S002081832510115X

[iv] Fraussen, B., Albareda, A., & Braun, C. (2020). Conceptualizing consultation approaches: identifying combinations of consultation tools and analyzing their implications for stakeholder diversity. *Policy Sciences,* 53, 473-493. https://link.springer.com/article/10.1007/s11077-020-09382-3

[v] We focus on the first year of both terms because we want to keep the data between the two Commission terms balanced and for VDLII we only have one year of data available at this stage.

[vi] De Bruycker, I., & Colli, F. (2023). Affluence, congruence, and lobbying success in EU climate policy. *Journal of Public Policy*, 43(3), 512-532. https://doi.org/10.1017/S0143814X23000120