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NGOs and the Clean Development Mechanism: constraints and opportunities in the discourse of EU consultations

Arthur Girling

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For further information on the Working Paper Series, please contact:

Jon Phillips
International Development,
University of East Anglia,
Norwich NR4 7TJ
E: jon.phillips@uea.ac.uk
W: www.clean-development.com

For further information on DEV and International Development UEA, please contact:

School of International Development
University of East Anglia
Norwich NR4 7TJ, UK
T: +44 (0) 1603 592807
F: +44 (0) 1603 451999
E: dev.general@uea.ac.uk
W: www.uea.ac.uk/dev

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Arthur Girling

Abstract

When creating the Clean Development Mechanism (CDM), the Kyoto Protocol described three main aims: meeting greenhouse gas reduction targets, sustainable development, and providing emissions cuts for the lowest cost. This study argues that these three aims represent powerful discourses, justifying the European Union's continued reliance on offset credits from the CDM. Furthermore, when advising policy-makers, NGOs may find it difficult to overtly oppose offsetting due to the power of these ideas. However, it also argues that these three discourses may provide some opportunities for NGOs to form new narratives, highlighting some of the contradictions inherent in offsetting.

Key words: NGOs, Clean Development Mechanism, discourse, consultation, EU, climate change policy, offsetting, Climate and Energy Package

About the author: Arthur Girling is a journalist and researcher, and has previously worked for NGOs in communications and climate change campaigning. e: Arthur_girling@yahoo.com

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Abbreviations and Acronyms

CAN	Climate Action Network
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CONCORD	Confederation for Relief and Development
DG	Directorate General
ETS	Emissions Trading Scheme
EU	European Union
FOE	Friends of the Earth
FOEE	Friends of the Earth Europe
GHG	Greenhouse gas
UNFCCC	United Nations Framework Convention on Climate Change
WWF	World Wildlife Fund

Introduction

Non-governmental organisations (NGOs) are often invited to participate in the policy-making processes of the European Union (EU). During the creation of the EU Climate and Energy Package of policies, a wide range of environmental, conservation, humanitarian and faith-based NGOs lobbied and participated in various consultations up to December 2008. However, when cooperating with policy-makers, NGOs may work with governments' policy aims and ideas, potentially excluding confrontational positions that question the status quo. This study considers this networked form of cooperation, considering both the constraints on what can be said, and NGO attempts to overcome these constraints without diminishing their position as policy advocates.

One of the most controversial elements of EU climate policy has been the inclusion of offset credits generated under the Clean Development Mechanism (CDM). The CDM is a framework for accrediting greenhouse gas reduction projects in the developing world, and the credits can be used to 'offset' emissions in the developed world. Several key discourses are evident in the Kyoto Protocol's (1998) description of the CDM. It states that the mechanism allows industrialised countries to buy credits from greenhouse gas reduction projects in the developing world, thus allowing them to meet their greenhouse gas reduction targets at the lowest cost while providing sustainable development benefits (Article 12). This paper aims to evaluate the power of discourses relating to emissions reductions targets, efficiency and sustainable development, considering how these ideas may support offsetting. Furthermore, it considers how they may restrict NGO criticism when undertaking advocacy and lobbying on the use of offsets.

This study defines NGOs as not-for-profit voluntarily-created organisations (Heins 2008). Further, they are formally independent of government, political parties or commercial organisations (European Commission 2000), distinguishing them from the many industry bodies active in EU politics.

Background

The EU climate change policy that will take effect from 2013-2020 was first proposed by the European Commission in *Winning the Battle on Climate Change* (European Commission 2005). In January 2008 the Commission announced the 'Climate and Energy Package'. This was intended to dovetail with the UN Framework Convention on Climate Change (UNFCCC) post-Kyoto policy. The EU package included a commitment to reduce greenhouse gas emissions by 20%, which could be increased to 30 % if a strong global mitigation agreement was reached at the Conference of the Parties (COP15) in December 2009 (European Council 2007). After a period of campaigning and lobbying from various actors, these proposed targets were agreed in December 2008. However, the final agreement was criticised by some NGOs for allowing large volumes of offset credits (Euractiv.com, 18 December 2008).

Post-2012 EU climate policy will include two trading mechanisms – the Effort Sharing (ES) Directive, and a new phase of the EU Emissions Trading Scheme (ETS). The ETS is a mechanism which facilitates trading between businesses. It represents the 'cornerstone' of Europe's climate change mitigation policy (European Commission 2007b). Businesses are allocated emissions permits. They can sell excess emissions allowances, and must buy more if they exceed their free allocation, thereby creating an incentive to reduce emissions. The Effort Sharing Directive (European Parliament/European Council 2009) covers sectors not included in the ETS such as housing and transport, for which countries can trade excess credits.

Offsetting mechanisms integrate into these systems, so instead of reducing emissions or buying excess credits from other polluters, countries and businesses can buy credits from verified emissions reduction projects wherever they are cheapest, often in the developing world. The largest of these 'flexible mechanisms' is the CDM, which generates Certified Emissions Reduction (CER) credits.

Inclusion of CERs in the EU system has been subject to extensive lobbying by various actors (Flam 2008). Many businesses were keen to include more CERs as a lesser emissions reductions effort would be required within the EU. In contrast, many NGOs protested that the number of offsets was too high. Between approximately 50 and 65% of total EU emissions could be offset depending on whether the 20 or 30% target was chosen (Pew Environment Group 2009). All NGOs consulted during this study¹ have opposed the unlimited use of CERs to meet EU emissions reduction targets. They have claimed that many of the projects have failed to provide the sustainable development benefits promised by the Kyoto Protocol, or even had adverse affects on local people. Many NGOs have also criticised the mechanism for the loose application of the 'additionality' principle, which stipulates that in order to receive credits, projects must prove that emissions reductions would not have happened without the funding from the CDM. At the more critical end of the spectrum, some NGOs have opposed any kind of offsetting in principle for equity reasons; others have argued that offsetting is ineffective and delays real action to address the climate problem. This has led the CDM to be reframed as a problem rather than a solution by some members of the NGO community.

Analytic framework

In constructing an analytic framework, this study will touch on three specific areas of interrelated work: discourse analysis, epistemic communities and policy entrepreneurship. These areas provide overlapping ways of analysing communication within policy-making processes. By considering both constraints on discourse and attempts to overcome such constraints, this paper traces the dynamic processes within which ideas are reproduced and changed.

Discourse

Foucault (1980) contended that discourses both enable and constrict what can be said, and what action can be taken. In this way, the ability to frame debates is a source of power. Hajer (1995) further develops this line of thought regarding environmental policy, arguing that discourse represents

a specific ensemble of ideas, concepts and categorisations that are produced, reproduced and transformed in a particular set of practices and through which meaning is given to physical and social realities (p.44).

According to Fairclough (2003: 124), discourses "are also projective imaginaries, representing possible worlds which are different from the actual world, and tied into projects to change the world in particular directions". Therefore NGOs may aim to control the discourse on offsetting, which in turn changes the range of possible policies. In this process, "actors are not totally free, but are, as holders of specific meanings, tangled in webs of meaning" (Hajer 1995: 56). A discourse analysis viewpoint sees NGO participation in policy making as a "discursive struggle" (Goodwin and Spittle 2002: 229) over meaning.

Drawing on discourses, NGO policy officers create narratives, which "reconstruct common sense to make the contingent seem determined and the artificial seem natural"

¹ A list of NGOs consulted during this study is provided in the reference section, under the heading personal communication (p.c)

(Cronon 1992: 1350). For example, a particular narrative can lead to a choice of tactics. Čapek (1993: 7) argues that “defining a situation as unjust is more than an act of categorisation, it implies a strategy for action”. The study of such narratives also needs to focus on what has been omitted; according to Hajer (1995: 35), complex data or research can be reduced to a single phrase or idea. As Stone (1989: 282) argues, “problem definition is a process of image making where the images have to do fundamentally with attributing cause, blame and responsibility” (see also Biersack 2006; Hinchcliffe 2007). Thus differing conceptions of the climate change problem lead to different policy proposals.

Climate change is commonly categorised as an environmental problem by policy makers, rather than a political, economic or industrial problem (cf. Demeritt 2001). Therefore NGOs involved in formulating policy may find debates are limited to the area of environmental policy, which has been grounded within the 'meta-discourse' of ecological modernisation since the 1987 Brundtland report, *Our Common Future* (Hajer 1995; Dryzek 2005). Within this discourse, care for the environment is not only compatible with ongoing economic growth, but can be a positive-sum game (Weale 1992; Buttel 2000; Berger et al 2001). This win-win element is an essential part of discourse supporting the CDM: countries can reduce their emissions for the lowest cost, while providing sustainable development in poorer countries (Bäckstrand and Lövbrand 2006). However, ecological modernisation discourses may effectively shut out policy proposals that do not provide win-win solutions for economic growth.

Furthermore, debates around the efficacy of the CDM as a solution to climate change may also depend largely on discursive creation. For example, it may be very difficult to quantify sustainable development benefits (Bakker et al 2009), or the most likely future greenhouse gas (GHG) emissions pathway from which the CDM baselines are drawn (Lohmann 2006; Trexler et al. 2006). In this way, defining offsetting as a problem or solution is a product of a discursive struggle.

Several authors have examined the discourses supporting the CDM. Lövbrand et al (2009) and Liverman (2008) describe the wide range of expectations attached to the CDM that threaten the legitimacy of the mechanism. A study by Boyd et al (2008) argues that some organisations supported offset credits from forestry because it fitted within their organisational discourse of preserving rainforests, while Bäckstrand and Lövbrand (2006) classify the multiple discourses underpinning forestry offsets, noting three main strands: ecological modernisation, green governmentality and civic environmentalism. All of these studies have shown the conflicted meaning of offsetting. These attempts at classification provide valuable insights, and form the starting point for this study. However, these studies provide only a snapshot of the dominant narratives at any one time, and do not show the dynamic interplay of discourse in political life. Furthermore, none of these studies focus on the EU's networked method of policy formulation, which it is here argued, provides both specific opportunities and constraints on what can be said. To this end, I will now turn to the concept of 'epistemic communities'.

Epistemic communities

The study of policy-making networks can help to understand the particular constraints on discourse which NGOs face when participating in the policy-making process. One model of a policy-making network is Haas' (1992a; 1992b) concept of an 'epistemic community' (see also Radaelli 1995).

An epistemic community can be defined as “a network of professionals with recognised expertise and competence in a particular domain and an authoritative claim to policy-relevant knowledge within that domain or issue-area” (Haas 1992a: 3). In contrast to

some other models of policy networks, actors within epistemic communities are not seen as wholly rational but rather, constrained by discourse (Börzel 1997). Experts are united by (1) shared normative beliefs and principles; (2) shared causal beliefs surrounding the policy problem; (3) shared notions of validity and; (4) a common policy enterprise (Haas 1992a). Expert knowledge is the main resource exchanged in such networks (Jasanoff 1997; Eising 2007).

This perspective is particularly relevant to describing the multi-level, networked policy-making processes in the EU (Zito 2001). This paper looks at the epistemic community on emissions trading described by Braun (2008: 8), "consisting of state actors, predominantly from the DG [Directorate General] Environment of the European Commission, and of non-state actors, such as experts from consultancies, environmental NGOs, companies, and business associations". Participation in this forum gives NGOs access to policy makers, but its cooperative nature can also restrict certain political positions. Liefferink and Anderson (1997) comment that the Commission is often overworked, and so only contributions offering solutions are welcomed. This suggests that NGOs may have to find positive alternatives instead of opposing policies outright, as access may be reduced for oppositional organisations (Ford 2003). As Rowlands (1995) notes, a consensus on the causes of a problem are essential for cooperation, which then necessarily leads to a limited number of possible solutions.

In the informal EU network of climate policy experts, a principal forum for participation was the European Climate Change Programme (ECCP) working group on emissions trading. Braun (2008:15) notes that the Directorate General Environment have become "managers' of the exchange of knowledge about emissions trading". Several authors have commented that certain narratives such as those regarding ethical or equity issues may be excluded from this site of technical discourse (Ford 2003; Hajer 1995; Gough and Shackley 2001). Therefore the very nature of NGO participation in such governance is not neutral, but is enmeshed within a particular discourse.

Gulbrandsen and Andresen (2004) make a distinction between insider and outsider NGO strategies on climate change. Outsider strategies include criticism of governments and public campaigns, although many NGOs may be forced to follow insider strategies with an issue like emissions trading. Gough and Shackley (2001) note that the technical nature of this subject means that many organisations may find it hard to mobilise public opposition. Furthermore, an NGO may decide to participate in these political spaces in order to diminish the influence of other groups, such as industry lobbyists.

Involvement in such networks therefore involves trade-offs. Organisations may find it hard to criticise a policy they have invested time in creating, and may lose integrity for compromising on a previously firm position. Indeed, policy makers may include NGOs in such networks to reduce the risk of their opposition during or after the policy-making process, or lend legitimacy to a policy (Mazey and Richardson 2006; Heins 2008). Furthermore, participation may require extra resources, including highly knowledgeable personnel who can bring value to the epistemic community. Nonetheless, many organisations are keen to offer their expertise, as it represents an opportunity to influence policy directly.

Participation in the epistemic community surrounding EU climate policy is informal and is premised on cooperation and sharing information. Some levels of input were open to any organisations, such as the survey for the EU ETS review in November 2006 (European Commission 2006). This review also included a series of meetings, in which certain NGOs were invited to give presentations on 'The view of an NGO' (Europa 2007). These invitations to speak may be based on previous cooperation, and DG

Environment's understanding that the NGO will take a cooperative, problem-solving approach. Furthermore, Elgström and Jönsson (2000) state that the interpersonal relationships and long-term negotiations prevalent in epistemic communities encourage a high level of cooperation and problem solving instead of conflictual bargaining approaches. Thus NGOs build trust and maintain their tenuous advisory role with cooperation (Ford 2003). It could be argued that this is a productive approach to creating workable compromises, although it should be remembered that it is impossible to negotiate the scientific evidence supporting climate change which NGOs claim to represent.

NGOs as policy entrepreneurs

Having considered models showing the constraints on policy makers, this paper now turns to an alternative perspective focusing on individual agency in the policy making process. Mintrom and Vergari (1995) suggest that network approaches (e.g. epistemic communities), which aim to explain stability, can be complemented by a 'policy entrepreneurship' approach which aims to explain dynamic changes in policy. Several studies have shown how NGOs working within the EU can be characterised as policy entrepreneurs (Peters 1994; Jordan et al 2000). Policy entrepreneurs "seek to initiate dynamic policy change" (Mintrom 1997: 739). They may supply expertise, speak for others or may be in an authoritative decision-making role. Although they may be outside the formal legislature, they develop policy, and adapt sophisticated strategies for pushing their ideas further up the policy-making agenda (Kingdon 2003).

There are several ways in which policy entrepreneurs from NGOs can put issues on the policy agenda. Sell and Prakash (2004) outline several ways in which actors can set the agenda with strategic deployment of discourse. For example by using metaphors, connecting previously unconnected ideas, debunking competing arguments, and grafting an agenda onto previously separate public debates. According to Dryzek et al. (2003), NGOs will have the most success when they can attach their interest to a core state imperative.

This paper seeks to combine these approaches by taking a discourse analysis perspective, examining both the institutional constraints on discourse imposed by the EU's climate change epistemic community, and the particular opportunities for policy entrepreneurs to overcome these constraints. The paper analyses three sources of data. First, it considers relevant policy documents from EU institutions. Of particular interest are those documents intended for policy-makers and those 'inside' the EU epistemic community, such as treaty texts, directives and technical communications. Second, the paper analyses NGO policy papers and reports relevant to post-2012 EU climate policy. A variety of documents were considered from international NGOs and NGO coalitions that have published comments on the CDM. While it is difficult to define NGOs as either 'in' or 'out' of the epistemic community, almost all the documents studied have come from within this domain: responses to the EU ETS review, submissions to consultations, position papers intended for the Commission and briefing documents. This gave a broad picture of various positions on offsetting, and how they were expressed. In common with Hajer's (1995) approach, analysis focused on meaning rather than the particular detail of texts. By taking a broad approach to the meaning embedded in these texts, the paper seeks to depict the "rules which 'govern' bodies of text or utterances" Fairclough (2003:123) or how text structures the world (see also Gee 1999; Wood and Kroger 2000). Third, insights drawn from the textual analysis are triangulated with a series of semi-structured interviews with NGO campaigners and policy officers². All interviewees

² All interviewees are listed in the reference section, under the heading personal communication (p.c)

have experience of advocacy surrounding the Climate and Energy Package, and many have authored the policy documents under analysis.

The following sections consider how NGO discourse has been both constrained and enabled by the three dominant discourses surrounding the CDM: meeting greenhouse gas reduction targets; sustainable development; and the market logic of lowest cost reductions

Greenhouse gas reduction targets

It is argued in this section that the EU approach to climate change mitigation has focused on meeting targets to reduce greenhouse gases, a narrative which justifies offsetting. Several NGOs have presented alternative narratives, thus highlighting contradictions in offsetting. However, in some circumstances, NGOs have attempted to exploit the dominant discourse of greenhouse gas targets to voice opposition.

When the dominant policy-making discourse defines climate change as a problem of greenhouse gases, a narrative is produced which posits their reduction as the solution (see Demeritt 2001). This definition of the problem is also evident in EU climate policy. The ultimate objective of the EU ETS, in line with the UNFCCC, is “to achieve stabilisation of greenhouse gas concentrations in the atmosphere at a level which prevents dangerous anthropogenic interference in the climate system” (European Parliament/European Council 2003: 3). More recently, the 2007 communication proposing the Climate and Energy Package states that “the EU pursues in the context of international negotiations the objective of 30% reduction in GHG emissions by developed countries by 2020 (compared to 1990 levels)” (European Commission 2007a: 1). Placing blame on invisible gases is a convenient narrative for policy makers. Stone (1989) would classify this as an “accidental cause” (p.285), where individuals, countries and companies are not responsible. Geographical considerations are erased, and climate change is defined as a problem to be fixed wherever it is most convenient. As the cheapest emissions reduction credits are often in the developing world, this narrative turns offsetting into a logical solution.

However, a counter-narrative used by NGOs to oppose offsetting draws attention to the historical responsibility of Northern countries (e.g. CONCORD 2009b; WWF 2008b; Greenpeace Europe 2009). Drawing on the idea of “common but differentiated responsibilities” from the UNFCCC treaty, Aprove (2008) argues that countries should reduce their emissions according to their “responsibility for climate change – based on the quantity of historical emissions they are responsible for” (p.3). This narrative shifts responsibility for the problem from gases to countries, thus inferring both blame and the moral imperative to fix it.

Furthermore, many NGOs have contested the principle policy aim of emissions reductions, presenting instead an alternative discourse of changing the EU’s energy infrastructure. For example, WWF (2008a: 1) states that offsetting “will not fulfil the goals of putting the EU on a low carbon trajectory” (see also CAN Europe et al 2007a; FOEE (2009). WWF (2008a) argues that:

Too much access to emission reduction “credits” outside the EU will both delay domestic reductions and keep investments in high-carbon infrastructure - such as new unabated coal-fired power stations - financially viable. This could lock us in to soaring CO₂ emissions in the EU for decades to come (p.2).

This focus on high carbon ‘lock-in’ is a key component of NGO opposition to offsetting. Likewise, FOE-UK (2009) argues that “Locking in their high-carbon infrastructure will have severe consequences for the global climate and developed country economies”

(p.5). This narrative implies the present is a turning point full of opportunities, in which the freedom of a “low-carbon model” (ibid.) is contrasted with the ‘locked-in’ future of fossil fuels. By reframing the aim of EU climate policy, NGOs re-position offsetting as a problem, rather than a solution, which is seen as holding the EU back from meeting its objective of emissions reductions.

Focussing on emissions reductions has allowed a further level of abstraction in climate policy. It will be here argued that the dominant climate change discourse has subsequently become an issue of meeting targets, which has further blurred the distinction between offsets and domestic reductions. The EU’s “commitment to achieve at least a 20% reduction of GHG emissions by 2020” (European Commission 2007a: 5.1) creates a narrative which may focus attention on the target rather than the practical action that goes into meeting it. In reality, such ‘EU targets’ can be met by buying external credits and offsets, but this complexity may be obscured by EU institutions, by repeatedly announcing emissions cuts of 20 or 30%, while relegating details of offsets to the legal text of directives. The debate becomes about the level of this single target, rather than whether the credits used to meet it are synonymous with climate change mitigation.

Several NGOs have attempted to highlight the hidden complexity in the 20-30% target by calculating the emission reductions taking place within EU borders. For example, FOEE (2008: 2) estimates that “about a third of the emission reductions under a 20% scenario could be reached with external credits coming from the CDM”. Some NGOs reworked statistics to show an even starker picture. Greenpeace (2008b: 2) recalculates the reductions using the baseline of 2005, instead of the EU’s 1990 baseline, showing that “Europe will reduce its emissions in the effort sharing sectors by less than 3.5% in 2020 (compared to 2005 emissions levels)”. The paper also includes a quote from a policy officer arguing “the effort sharing law allows so much offsetting outside the EU that I don’t think it even qualifies as EU legislation any more” (p.1). While these narratives are still firmly within the discourse of targets, Greenpeace still manages to deploy new information to influence debates.

The equivalence of offsets with other types of credits is further reinforced by the Kyoto Protocol (1997, Articles 3 and 12), where they are designated as qualitatively equal. Moreover, offsets from the CDM are named ‘Certified Emissions Reductions’ (CERs), so within the discourse of emissions reductions targets, purchase of CERs appears to fit perfectly with the aim of climate policy. Indeed, framing the purchase of CERs as legitimate “compliance” (European Council/European Commission 2004) further links offsets to the policy objective. This entrenched discourse represents a challenge for NGOs aiming to oppose offsets.

In contrast to the view that offsets are European emissions reductions, some NGOs have deployed new narratives to distinguish between types of credits. Instead of “emissions reductions” as used by the EU institutions (European Council/European Commission 2004; European Commission 2007a), many NGOs employ the term “external credits” (e.g. CAN Europe et al. 2007b; FOEE 2008). There are also more explicit explanations of the difference between offsets and other reductions. WWF (2008a: 1) describes how offsetting is “at best a zero sum game for the climate – for every tonne of CO₂-equivalent reduced by the CDM, a country or company buys the right to emit a tonne of CO₂ at home”, calling instead for “absolute reductions”. As described below, many policy makers have failed to incorporate this distinction into policy, potentially cutting the levels of emissions reductions made globally.

While the aim of EU climate policy has moved away from emissions reductions and

towards targets, the discourse has become so far removed from the climate problem that some policy-makers have suggested illogical 'double-counting' methods of emissions reductions. As part of the 2007 Bali Action Plan the EU made a commitment to finance climate change mitigation in developing countries in addition to the 20% cuts agreed as part of the Climate and Energy Package. However, according to Wyns (p.c), many policy-makers proposed that purchasing offsets from developing countries should count towards this financing commitment whilst also counting towards EU targets. Filzmoser (p.c.) sees this double counting as an intentional process: "I think a lot of industry lobbies to get double counting in, also governments. Because it's easier for them, than to have higher targets if they can double count". The acceptance of double counting in some areas shows that any sense of what is being measured has been lost, and meeting targets has become an end in itself.

The double counting debate is a discursive struggle over the dominance of two different conceptions of the policy aim: meeting targets, and limiting climate change. Therefore several NGO criticisms drew on the IPCC's recommendations of both emissions cuts of 25-40% in developed countries, and a significant deviation from business as usual in developing countries (e.g. Oxfam International 2009; FOEE 2008). This narrative also aimed to expose the hypocrisy of EU climate policy, by framing it with its original aim: limiting average global warming to 2°C, an EU commitment since 1996 (see European Commission 2007a). Gore (p.c.) recalls, "We slammed it [the Climate and Energy Package], based on the number of offsets allowed in the system. The reason being that they hadn't come up with a financing package for developing countries, so this wasn't a package that was 2° consistent". These attempts represent a constant struggle for NGOs to bring climate policy discourse back to its scientific basis.

In order to combat the obscuring effects of 20% or 30% targets that have allowed double counting, some NGOs proposed a new system of 'dual targets', which separate offsets from other emissions reductions. For example, WWF (2008a: 2) argues for the "financial equivalent of an additional 15% emission reductions" in developing countries through an offsetting mechanism, on top of a 30% domestic reduction. Likewise, Greenpeace Europe (2008a: 2) demands that "external credits should only be eligible for use if they come on top of this minimum effort and if they fulfil strict criteria" (see also CAN Europe et al. 2007a). This was an intentional framing of the issue to express the contradiction in the single target position (Grundstrom p.c.; Kumar p.c.; Wyns p.c.).

The use of dual targets represents a way of arguing against offsetting without overtly opposing offsets, which is useful where outspoken opposition may be difficult in the epistemic community forum. Nonetheless, the dual targets concept contains some strong opposition to offsetting within a positive proposal. In essence, if offsets do not count towards EU domestic targets, and are instead counted as part of another target, this undermines the fundamental reason for their existence – indeed, offsets cease to offset any emissions at all. Furthermore, it allows NGOs to advocate financing within an appealing offsetting-style package, where the EU can take credit for reductions. As well as a policy idea, this proposal can also be seen as a communicative device used by policy entrepreneurs. This suggests that participation within the epistemic community may encourage NGOs to reframe criticism as a positive proposal.

Within the discourse of emissions reductions targets, some NGOs have repeatedly struggled to bring the focus of policy-making back to the scientific basis of climate change and its humanitarian effects. This has been difficult as many interested parties would prefer more malleable, abstract aims, such as meeting targets. Targets are an essential element to the cap and trade process, so it may be essential for NGOs to engage in the epistemic community's discourse of targets and emissions reductions in order to

participate in policy-making. However, this engagement may curtail their ability to criticise discourses which underpin offsetting. One way around this has been the use of positive proposals such as dual targets. This shows dominant discourses to be a source of opportunities as well as constraints for NGOs. Nonetheless, such proposals may also be easier to dismiss than open opposition.

Sustainable development

The EU Linking Directive (European Parliament/European Council 2004), which establishes the link between the CDM and the ETS, cites sustainable development as one of the key benefits of allowing CDM credits. While NGOs and other members of the epistemic community seem to agree on the need for sustainable development, this superficial agreement belies the fragmented nature of the concept.

Following the Brundtland et al. (1987) definition, the 2006 EU Sustainable Development Strategy states that “Sustainable development means that the needs of the present generation should be met without compromising the ability of future generations to meet their own needs” (European Council 2006: 1). This commonly accepted definition encompasses a multitude of meanings and raises further questions over what constitutes development and how to identify and deliver present and future generations’ needs (Adams 1995; Baker et al 1997). An example of this vagueness can be seen in the UNFCCC and the Kyoto Protocol, which do not define sustainable development at all – instead deferring definition to host governments of projects (Banuri and Gupta 2000). In practice, host governments have interpreted this criteria ‘very loosely’, according to Bumpus and Liverman (2008), as adhering to a strict definition would force governments to refuse accreditation of CERs and therefore lose foreign investment (Filzmoser p.c.). The EU has shown a more active interpretation of sustainable development within the ETS, excluding CERs from certain large dam projects on sustainable development grounds (European Commission 2004). Nonetheless, all other CERs are accepted by the EU without questioning the circumstances of their production.

Most of the NGOs examined in this study engage directly in the discourse of sustainable development, calling for sustainable development benefits to be taken into account in CDM projects. For example, CAN Europe, FOE, WWF, and Greenpeace (2007a: 1) argue that “the EU must show a clear ambition to support developing countries in addressing their greenhouse gas emissions and in achieving sustainable development”. Aprove and Oxfam also demand sustainable development, while CONCORD's (2009a: 2) mission statement includes the aim of promoting “sustainable economic and social development”. The concept of sustainable development is broadly accepted within the epistemic community although, as outlined below, sustainable development can mean very different things to different parties.

The ambiguity of sustainable development has allowed different actors to assign different meaning to the concept. One such meaning is the managerial discourse of sustainable development created by the CDM accreditation process. The CDM Executive Board decides which projects can be credited, while the complex processes of verification and certification are lengthy and expensive, weighting the process towards multinational companies and governments (Lövbrand et al. 2007). Lohmann (2009a) notes the system of calculating additionality creates a narrative which frames the world as deterministic, in which a few rational actors – usually owners of large industrial or energy facilities – are capable of changing the global emissions trajectory. Within this discourse sustainable development becomes something that should be managed by governments and international agencies, subject to measurement, reporting and

verification; individuals and communities are sidelined, or even seen as irrelevant in combating climate change.

In contrast, NGOs have interpreted the concept of sustainable development to specify participatory approaches to development, with benefits for local people. As Jacobs (1999) argues there exists a 'strong' participatory version of sustainable development and a 'weak' managerial version. For example, FOE-UK (2009: 27) argues that "sustainable development benefits could potentially be improved by reforms such as better participation in decisions, or bans on certain types of project". Within this 'strong' participatory discourse, projects that should be banned for failing to meet sustainable development aims include flourinated gas destruction, nuclear energy (so far not included in the CDM) and large hydroelectric projects (FOE-UK 2009; see also WWF 2007). There is a strong social justice aspect to this discourse: sustainable development criteria should include "fair access to resources, distribution of wealth and a mutual commitment to human rights, gender equality, social and economic justice" (CONCORD 2008: 3; see also Aprovev 2009).

The participatory approach challenges the legitimacy of corporations and governments as the only agents of sustainable development. For example, FOE-UK (2009) argues that:

the revenues going to the corporations fitting HFC and N₂O and fossil-fuel efficiency projects and new coal and gas-fired power plants ... are not going to be spent on renewable or sustainable development projects. They are going to corporations that are building more fossil-fuel intensive industries (p.20).

Here, the role of corporations is seen as antithetical to sustainable development, in contrast to the UNFCCC narrative, which sees them as stakeholders in the sustainability process. These differing conceptions point to a struggle over meaning in which agency and the beneficiaries of sustainable development are disputed. Beyond simply using a different definition of sustainable development, WWF has led attempts to codify the definition, thereby attempting to increase control over the discourse. They have done this by creating the CDM Gold Standard accrediting scheme, which has been backed by several other organisations. For example, CAN Europe et al. (2007b) argue that:

only CDM projects accredited under the '**CDM Gold Standard**' truly are additional and benefit sustainable development. This standard is the only guarantee that emission reductions not taking place in the EU ETS are compensated by real reductions taking place elsewhere in the world (p.16, original emphasis).

This narrative ignores the uncertainty of additionality, using a "rhetorical razor" (Cronon 1992: 1349) to draw a clear line between 'good' and 'bad' CDM projects. By specifying that projects should benefit the local community, NGO accreditation schemes can also be seen as an attempt to formally set the definition of sustainable development. However, attempts to stipulate the Gold Standard as a legal requirement failed, although the final EU directive does mention types of projects that should provide credits (European Commission 2008b: Article 11a). This struggle over the definition of sustainable development highlights the deep rift between the different discourses.

As outlined above, debates over sustainable development have largely focused on ensuring the correct qualitative criteria for projects. However, debates over what the CDM should do may constrain challenges to the fundamental rationale for offsetting. By trying to ensure 'good' projects, NGOs such as WWF are implicitly acknowledging that offsets can be beneficial. This tendency towards working to improve the existing system is a particular feature of the epistemic community, and could arguably show that some organisations have been co-opted into supporting offsetting by their participation in such networks.

The broad concept of sustainable development is deeply ingrained within the EU and

UNFCCC justification for offsetting. Several NGOs have been able to criticise the CDM for a lack of sustainability criteria by using a different definition of the concept. However, this criticism aims to work within the institutional discourse, rather than rejecting it outright, suggesting that participation in the epistemic community may have tamed opposition.

Market logic and the cheapest emissions reductions

EU climate policy is firmly located within a market system, through both international emissions trading mechanisms and the EU ETS. The rationale for market-based mechanisms – that they can seek out the cheapest emissions reductions – has created a powerful discourse in which offsetting is presented as a logical next step. Like many commodities, emissions reductions are cheaper to produce in the developing world (see Lohmann 2009). Indeed, CERs have been consistently cheaper than excess allocated credits (Alberola et al. 2009), and vastly cheaper than infrastructure change in Europe (Lohmann 2006).

Economic efficiency is an important idea within the EU epistemic community and the CDM is synonymous with low-cost mitigation throughout EU climate policy. The Commission notes that “the purpose of the [emissions trading] scheme is to promote reductions of greenhouse gas emissions in a cost-effective and economically efficient manner” (European Commission 2006: 1). On establishing the ETS, the Commission noted the aim was to “contribute to fulfilling the commitments of the European Community and its Member States more effectively ... with the least possible diminution of economic development and employment” (European Parliament/European Council 2003: 4). Low cost has also been used to justify increased access to offset credits. The Commission states that credits from Kyoto’s flexible mechanisms will “increase the cost-effectiveness of achieving reductions of global greenhouse gas emissions” (European Parliament/European Council 2004: 2). The European Council also reaffirmed its commitment to buying credits from the CDM for reasons of lowest cost in a meeting in February 2007 (European Council 2007).

Several NGOs also actively engage in the low cost narrative. As one NGO representative (who wished to remain anonymous) notes, most large NGOs “accept the idea behind the CDM developed at Kyoto, that you had to find something which would deliver the reductions at least cost”. He says many groups that oppose the lowest-cost principle are “out there” because it’s a “very difficult position to go with”. Likewise, Gore (p.c.) states that:

in order to support the use of market mechanisms, you are implicitly recognising that cost of reductions is a factor, you know, a factor which should be taken into account. That’s not to say that it’s a factor which should override all, or indeed any, other principles that you might have.

Nonetheless, as cost efficiency is the main argument for using market mechanisms, other considerations may be sidelined. The quest for emissions reductions at the lowest cost contradicts another aim of emissions trading: to provide a price to drive infrastructural change (see Grubb 2006; Grubb and Neuhof 2006). In 2005 the Commission stated that, “Establishing a market value for greenhouse gases... will provide a financial incentive curbing demand, promoting the widespread use of such technologies, and encourage further technological development” (European Commission 2005: 5). But the strength of a price lever to drive change is undermined by seeking the cheapest emissions reductions. The added liquidity in the market from offsets in turn reduces the market price of allocated units – so companies actually have less of an incentive to make efficiency gains and sell their excess allocation of credits.

It is notable that, of the NGO policy documents examined, none explicitly argued for a

higher carbon price. Many NGOs have used a slightly different framing, arguing that offsetting will not lead to change within the EU because changes will take place instead in developing countries. Some go further in questioning the logic of least cost. For example, WWF (2009: 9) states that, "Focusing solely on a least-cost approach carries the danger that investments will be prioritized to the areas where cheapest reductions can be made, without a strategic vision of what structures and infrastructure are needed to be able to deliver a net zero carbon society in the EU by 2050". The inability to challenge the lowest-cost discourse head-on suggests that more subtle narratives may be required.

As opposition to offsetting may be trumped by the low-cost argument, NGOs have attempted to work within this discourse to argue that offsetting is ultimately expensive in the longer term. For example, CAN Europe et al. (2007b: 6) argue that by relying heavily on offsetting, the EU will build high-carbon infrastructure that "would make achievement of future reduction targets very difficult and costly". Greenpeace (2008b: 1) states that offsetting "does nothing to reduce our dependence on expensive fossil fuels like gas from Russia and won't reduce our energy bills". These examples suggest that NGOs have attempted to align energy security and economic benefits with domestic emissions reductions. Kingdon (2003) argues that this alignment of two previously independent issues is a key activity of policy entrepreneurs – in this case energy security and domestic emissions reductions - in order to push their perspective onto the policy agenda (see also Dryzek et al. 2003).

In addition to highlighting the long-term expense of offsetting, NGOs have also focused on the positive economic outcomes associated with domestic infrastructure change. For example, WWF (2008a: 3) argues that "providing clear financial incentives to reward low carbon investment within the EU... will stimulate innovation and employment opportunities for the existing and future workforce of Europe". This framing was not exploited enough, according to Wyns (p.c.), who believes that emphasising this aspect could have avoided the heavy reliance on offsets within effort sharing: "If the Commission had re-baptised the effort sharing decision into the green jobs decision or the green economy decision, European ministers might have looked at it with other eyes". Again, opposition to offsetting is framed within the core imperatives of EU policy, in this case job creation and economic competitiveness.

The lowest-cost aim in EU climate policy creates some critical constraints on NGO discourse within the epistemic community. As Kumar reflects, "we're currently locked in to a market-based approach to climate change; I think that's a fair assumption. So the ETS, and the CDM, they're all key parts of that ideology". As Hajer (1995) has argued, within the ecological modernisation 'meta-discourse', environmental policies must provide economic benefits. Discourses that rationalise seeking the cheapest emissions reductions may touch on fundamental debates about what is best for society. Byrne and Yun (1999: 494) argue that the quest for cheap emissions reductions has been legitimised by the "discourse of power", which sees the welfare of society and capital as synonymous. Hence, debates revolve around a reduced economic burden (through offsetting) or potential job creation (through domestic emissions reductions).

Conclusion

Through the analysis of NGO position papers, EU policy documents and interviews with NGO policy officers, this paper has examined the constraints and opportunities on NGOs within the EU climate change policy-making network. Specifically, it has focused on ways in which NGOs are able to communicate problems with the CDM within three areas

of discourse: greenhouse gas emissions reductions targets; sustainable development; and the market logic of lowest-cost emissions reductions.

This account suggests that NGO opposition to offsetting is constrained within the EU epistemic community. It seems that these three discourses studied set the terms of the debate, and oppositional NGOs are forced to engage in this discourse – for example NGOs may seek to redefine sustainable development, or argue against offsets along the lines of economic efficiency. Occasionally, however, NGO campaigners have tried to change the dominant ideas, for example by attempting to change the EU policy aim from meeting targets to promotion of European infrastructural change. Future research could examine which strategy is more effective: discursively linking NGO objectives to other Commission objectives, or outright opposition to offsetting.

The paper has also examined how NGOs use new policy proposals to open windows of meaning. A notable example was the proposal for dual targets, which aimed to highlight some of the contradictions of double counting within the offsetting debate. Beyond the stated aims of the policy, this proposal was also communicative, allowing NGOs to highlight some of the contradictions in offsetting policy. During this research, a complex picture of NGO discourse has emerged. To conceptualise NGO actors as completely rational members of a policy community (see Börzel 1997) or as fully co-opted by state interests (see Gough and Shackley 2001; Heins 2008) is overly simplistic.

This study takes a slightly simplified view of NGOs and policy makers, when in reality a huge variety of different actors take a wide range of positions. There was some variation between NGOs studied here – for example FOE took a more oppositional stance than other NGOs, while WWF could be considered the least outspoken. However, most of the NGOs under analysis tended to cluster together in their ideas and proposals. This may be due to the nature of information sharing between various policy officers – as Philippe (p.c.) comments, Aprodev received several workshops in climate policy from WWF and CAN as they became more interested in campaigning on the issue. Further research could attempt to document differences between NGOs, and the way in which positions are influenced by information sharing.

In the final Climate and Energy Package large allowances for offsetting were included, indicating the strength of the discourses underpinning the CDM. It is only possible to speculate whether a more oppositional approach, rejecting the epistemic community, could have yielded stronger climate policy. Potentially, an overtly oppositional approach may be even less effective. Gulbrandsen and Andresen (2004) lay out four key NGO resources for achieving their goals: expert knowledge; membership base; access to politicians; and financial resources for lobbying, campaigning, etc. Considering their membership base, it may be difficult to motivate the public on technical issues such as carbon trading. Unless NGOs have other political avenues they can pursue, in which they can use their financial resources and expert knowledge, the epistemic community around DG Environment may be the best way to influence EU policy.

References

- Adams, W. (1995) Green development theory? environmentalism and sustainable development. In Crush, J. (ed.), (1995) *The Power of Development* (pp.87 – 99). London; New York: Routledge, pp.87 - 99
- Alberola, E., Chevalier, J., Hervé-Mignucci, M., Mansanet-Bataller, M. (2009) *The CER-EUA Spread: Compliance Strategies and Arbitrage in the European Carbon Market*. June 2009 [Online]. Available from: <http://www.usaee.org/usaee2009/submissions/Presentations/SFAIberola.pdf> [Accessed on

- 28/07/09].
- Aprodev (2008) *Post 2012 Climate Change communication: Input from Aprodev*. Brussels, 17 December, 2008. [Online]. Available from: http://www.aprodev.net/climate/Documents/AprodevInput%20toPost2012CC_communication.pdf [Accessed on 30/07/09].
- Aprodev (2009) *APRODEV Response to the Communication from the European Commission including Recommendations for the European Council Conclusions: 'Towards a comprehensive climate change agreement in Copenhagen'*. Brussels: Aprodev. [Online]. Available from: <http://www.aprodev.net/climate/Documents/APRODEV%20Response%20to%20the%20EC%20Communication%20-%20Final%20Version.pdf> [Accessed on 27/05/10].
- Bäckstrand, K., and Lövbrand, E. (2006) Planting trees to mitigate climate change: contested discourses of ecological modernisation, green governmentality and civic environmentalism. *Global Environmental Politics*, 6:1, pp.51 – 75
- Baker, S., Kousis, M., Richardson, D., and Young, S. (1997) The theory and practice of sustainable development in EU perspective. In: Baker, S., Kousis, M., Richardson, D., and Young, S. (eds.) (1997) *The politics of sustainable development: theory, policy and practice within the European Union*. London: Routledge
- Banuri, T., and Gupta, S. (2000) The Clean Development Mechanism and sustainable development: An economic analysis. In ADB (2000) *Implementing the Kyoto Protocol: opportunities and pitfalls for developing countries*. [Online]. Available from: http://www.adb.org/documents/books/kyoto_protocol/default.asp [Accessed on 27/05/10].
- Berger, G., Flynn, A., Hines, F., Johns, R. (2001) Ecological Modernization as a Basis for Environmental Policy: Current Environmental Discourse and Policy and the Implications on Environmental Supply Chain Management. *Innovation: The European Journal of Social Science Research*, 14:1, pp.55 - 72
- Biersack, A. (2006) Reimagining political ecology: culture/power/history/nature. In: Biersack, A., and Greenberg, J. (eds.). (2006) *Reimagining political ecology*. Duke University Press
- Börzel, T. (1997) What's so special about policy networks? An exploration of the concept and its usefulness in studying European governance. *European Integration Online*, 1: 16, pp.1 – 31
- Boyd, E., Corbera, E., and Estrada, M. (2008) UNFCCC negotiations (pre-Kyoto to COP-9): what the process says about the politics of CDM-sinks. *International Environmental Agreements* 8, pp.95 – 112
- Braun, M. (2008) The evolution of emissions trading in the European Union – the role of policy networks, knowledge and policy entrepreneurs. *Accounting, Organisations and Society* 34: 3-4, pp.469 – 487
- Bruntland, G. (ed.), (1987) *Our common future: The World Commission on Environment and Development*. Oxford, Oxford University Press
- Bumpus A., and Liverman, D. (2008) Accumulation by decarbonisation and the governance of carbon offsets. *Economic Geography*, 84: 2, pp.127 – 55
- Buttel, F. (2000) Ecological modernisation as social theory. *Geoforum* 31, pp.57 - 65
- Byrne, J., and Yun, S., (1999) Efficient global warming: contradictions in liberal democratic responses to global environmental problems. *Bulletin of Science, Technology & Society*. 19:6, pp. 493 – 500
- CAN-Europe, WWF, Greenpeace, FOEE (2007a) *Global leadership means domestic action. Response to the EU ETS Review*. [Online]. Available from: http://www.foe.co.uk/resource/consultation_responses/eu_ets_review.pdf [Accessed on 02/07/09].
- CAN-Europe, WWF, Greenpeace, FOEE (2007b) *ECCP EU ETS review process: written comments* CAN-Europe, Friends of the Earth Europe, Greenpeace and WWF. June 2007.
- Čapek, S. (1993) The Environmental Justice Frame: A Conceptual Discussion and an Application. *Social Problems*, Vol. 40, No. 1, pp.5-24
- CONCORD (2008) *The European Union and its Responsibility in the World: CONCORD Manifesto for the 2009 European Parliament Election*. July 2008. [Online]. Available from: http://www.concordeurope.org/Files/media/0_internetdocumentsENG/4_Publications/3_CONCORDs_positions_and_studies/Positions2009/CONCORD-EU-MANIFESTO-FINAL.pdf [Accessed on 27/05/10].
- CONCORD (2009a) *CONCORD Info Pack*. [Online]. Available from: http://www.concordeurope.org/Files/media/0_internetdocumentsENG/2_About_CONCORD

- /2 Information about CONCORD/About CONCORD/CONCORD-info-pack-EN-2009.pdf
[Accessed on 27/05/10].
- CONCORD (2009b) *Working paper of the CONCORD climate change group 'climate change and development'*. 26 May 2009. [Online]. Available from:
[http://www.reliefweb.int/rw/lib.nsf/db900sid/PSLG-7U8C57/\\$file/concord_may2009.pdf?openelement](http://www.reliefweb.int/rw/lib.nsf/db900sid/PSLG-7U8C57/$file/concord_may2009.pdf?openelement) [Accessed on 27/05/10].
- Cronon, W. (1992) A Place for Stories: Nature, History and Narrative. *The Journal of American History*, Vol. 78, No. 4, pp. 1347-1376
- Demeritt, D. (2001) The construction of global warming and the politics of science. *Annals of the Association of American Geographers*, Vol. 91, No. 2, pp.307 - 337
- Dryzek, J. (2005) *The Politics of the Earth – Environmental Discourses* (2nd edition). Oxford: Oxford University Press
- Dryzek, J., Downes, D., and Hernes, H. (2003) *Green states and social movements: environmentalism in the United States, United Kingdom, Germany, and Norway*. Oxford: Oxford University Press
- Eising, R. (2007) Institutional Context, Organizational Resources and Strategic Choices. *European Union Politics*, 8:3, pp.329 – 362
- Elgström, O., and Jönsson, C. (2000) Negotiation in the European Union: bargaining or problem-solving? *Journal of European Public Policy*, 7: 5, pp.684 — 704
- Euractiv.com (2008) Mixed reactions as Parliament approves EU climate deal. 18 December 2008. [Online]. Available from: <http://www.euractiv.com/en/climate-change/mixed-reactions-parliament-approves-eu-climate-deal/article-178163> [Accessed on 26/05/10].
- Europa (2007) Emission Trading System (EU ETS) - ETS Review. [Online]. Available from: http://ec.europa.eu/environment/climat/emission/review_en.htm [Accessed on 27/05/10].
- European Commission (2000) *The Commission and Non-Governmental Organisations: Building a Stronger Partnership*. Brussels: EC
- European Commission (2004) *Guidelines on a common understanding of Article 11b (6) of Directive 2003/87/EC as amended by Directive 2004/101/EC*. Non paper. [Online] Available from: http://ec.europa.eu/environment/climat/emission/pdf/art11b6_guide.pdf [Accessed on 15/08/0927/05/10].
- European Commission (2005) *Winning the Battle Against Global Climate Change* (COM(2005)35). Brussels: European Commission
- European Commission (2006) *Building a global carbon market – Report pursuant to Article 30 of Directive 2003/87/EC*. COM(2006)676 final. Brussels: EC
- European Commission (2007a) *Limiting global climate change to 2 degrees Celsius - The way ahead for 2020 and beyond* (COM(2007)2). Brussels: European Commission
- European Commission (2007b) EU action against climate change. EU emissions trading: an open system promoting global innovation. Brussels: European Commission
- European Commission (2008) Proposal for a directive amending Directive 2003/87/EC so as to improve and extend the greenhouse gas emission allowance trading system of the community (December 2008) (2008/0013(COD)). Brussels: European Commission
- European Council (2006) Renewed EU sustainable development strategy. (10917/06). Brussels: European Council
- European Council (2007) *Presidency Conclusions, 8-9 March 2007*. Brussels: European Council
- European Parliament/European Council (2003) Directive establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC . 2003/87/EC. Brussels: EC
- European Parliament/European Council (2004) 'Linking Directive' (2004/101/EC). Brussels: Official Journal of the European Union
- European Parliament/European Council (2009) Effort Sharing Directive (406/2009/EC) Brussels: Official Journal of the European Union
- Fairclough, N. (2003) *Analysing discourse: textual analysis for social research*. London: Routledge
- Flam, K. (2008) Restricting the import of 'emission credits' in the EU: a power struggle between states and institutions. *International Environmental Agreements* 9: 1, pp. 23–38
- FOEE (2008) Ensuring annual cuts are met in the Commission's Effort Sharing proposal: Comments and lobby recommendations for the June Environment Council 2008. [Online]. Available from:
http://www.foeeurope.org/climate/download/FOEE_EffortSharing_brief_May%20final_web

- .pdf [Accessed on 27/05/10].
- FOEE (2009) Climate Justice & Energy Campaign. [Online]. Available from: <http://www.foeeurope.org/climate/index.htm> [Accessed on 05/07/09].
- FOE-UK (2009) *A dangerous distraction: Why offsetting is failing the climate and people: the evidence*. June 2009. [Online]. Available from: http://www.foe.co.uk/resource/briefing_notes/dangerous_distraction.pdf [Accessed on 26/05/10].
- Ford, L. (2003) Challenging global environmental governance: social movement agency and global civil society. *Global Environmental Politics* 3: 2. pp.120 – 134
- Foucault, M. (1980) *Power/Knowledge: Selected Interviews and Other Writings 1972-1977*. London: Harvester
- Gee, J. (1999) *An Introduction to Discourse Analysis*. London: Routledge
- Goodwin, I., and Spittle, S. (2002) The European Union and the information society: Discourse, power and policy. *New Media and Society* 4:2 pp.225 – 249
- Gough, C., and Shackley, S. (2001) The Respectable Politics of Climate Change: The Epistemic Communities and NGOs. *International Affairs*, 77: 2, pp.329 – 345
- Greenpeace Europe (2008a) *Greenpeace draft position paper on the European Commission legislative proposals on: effort Sharing of the EU-27 climate targets for 2020; review of the Emissions Trading Scheme for its operation from 2013. 25 March 2009*. [Online]. Available from: <http://www.greenpeace.org/raw/content/eu-unit/press-centre/reports/Greenpeace-position-on-Effort-sharing-and-emission-trading-scheme.pdf> [Accessed on 27/05/10].
- Greenpeace Europe (2008b) MEPs must exercise their democratic power and reject the EU's 'effort sharing' law. Brussels, 16 December 2008.
- Greenpeace Europe (2009) Financing the EU's global responsibility. 27 February 2009. [Online]. Available from: <http://www.greenpeace.org/raw/content/eu-unit/press-centre/policy-papers-briefings/financing-eu-responsibility-270209.pdf> [Accessed on 27/05/10].
- Grubb, M. (2006) Emissions Impossible. *The Guardian* (15/05/09). [Online]. Available from: <http://www.guardian.co.uk/commentisfree/2006/may/15/emissionsimpossible> [Accessed on 24/02/09].
- Grubb, M., and Neuhoff, K. (2006) Allocation and competitiveness in the EU emissions trading scheme: policy overview. *Climate Policy* 6 pp. 7–30
- Gulbrandsen, L., and Andresen, S. (2004) NGO Influence in the Implementation of the Kyoto Protocol: Compliance, Flexibility Mechanisms, and Sinks. *Global Environmental Politics* 4: 4, pp. 54 – 75.
- Haas, P. (1992a) Introduction: Epistemic Communities and International Policy Coordination. *International Organization*, 46: 1, pp.1 - 35
- Haas, P. (1992b) Banning chlorofluorocarbons – epistemic community efforts to protect stratospheric ozone. *International Organization*, 46: 1, pp. 187 - 224
- Hajer, M. (1995) *The politics of environmental discourse: Ecological modernisation and the policy process*. Oxford: Clarendon Press.
- Heins, V. (2008) *Nongovernmental organizations in international society: struggles over recognition*. London: Palgrave Macmillan
- Hinchcliffe, S. (2007) *Geographies of Nature*. London: Sage
- Jacobs, M. (1999) Sustainable development as a contested concept. In Dobson, A. (ed.).(1999) *Fairness and Futurity* (pp.21 - 45). Oxford: Oxford University Press
- Jasanoff, S. (1997) NGOs and the environment: from knowledge to action. *Third World Quarterly*, 18: 3, pp.579 – 594
- Jordan, A., Wurzel, R., and Zito, A. (2003) *New instruments of environmental governance? Pathways and Patterns of Change*. In: Jordan, A., Wurzel, R., and Zito, A. (2003) (eds.) *New instruments of environmental governance?* London: Routledge
- Kingdon, J. (2003) *Agendas, alternatives and public policies* (2nd edition). New York: Longman
- Kyoto Protocol (1998) Kyoto Protocol to the United Nations Framework on Climate Change. United Nations. [Online]. Available from: <http://unfccc.int/resource/docs/convkp/kpeng.pdf#page=12> [Accessed 27/05/10].
- Liverman, D. (2008) Conventions of climate change: constructions of danger and the dispossession of the atmosphere. *Journal of Historical Geography* 35: 2, pp.279 - 296
- Lohmann, L. (2006) *Carbon Trading: a critical conversation on climate change, privatisation and power*. Uppsala: Development Dialogue no. 48
- Lohmann, L. (2009) Neoliberalism and the calculable world: the rise of carbon trading. In: Birch,

- K., Mykhnenko, V., and Trebeck, K. (eds.) (2010) *The Rise and Fall of Neoliberalism: The Collapse of an Economic Order?* London: Zed Books.
- Lövbrand, E., Nordqvist, J., and Rindeljäll, T. (2009) Closing the Legitimacy Gap in Global Environmental Governance? Lessons from the Emerging CDM Market. *Global Environmental Politics* 9: 2, pp. 74 - 100
- Mazey, S., and Richardson, J. (2006) Interest groups and EU policy-making. In: Richardson, J. (ed.). (2006) *European Union: power and policy-making* (3rd edition). London: Routledge
- Mintrom, M. (1997) Policy entrepreneurs and the diffusion of information. *American Journal of Political Science* 41, pp.738 – 770
- Mintrom, M., and Vergari, S. (1995) Advocacy coalitions, policy entrepreneurs and policy change. *Policy Studies Journal*, 24: 3, pp.420 - 434
- Peters, G. (1994) Agenda-setting in the European community. *Journal of European Public Policy*, 1: 1, pp. 9 - 26
- Oxfam International (2009) Hang Together or Separately? How global co-operation is key to a fair and adequate climate deal at Copenhagen. Briefing paper, 11 June 2009.
- Pew Environment Group (2009) *The European Union Climate Package*. [Online]. Available from: <http://www.pewglobalwarming.org/ourwork/international/bonn/EUClimatePackage.pdf> [Accessed on 18/08/09].
- Radaelli, C. (1995) The role of knowledge in the policy process. *Journal of European Public Policy* 2: 2, pp.159 - 183
- Rowlands, I. (1995) *The politics of global atmospheric change*. Manchester: Manchester University Press
- Sell, S., and Prakash, A. (2004) Using Ideas Strategically: The Contest Between Business and NGO Networks in Intellectual Property Rights. *International Studies Quarterly* 48, pp.143 – 175
- Stone, D. (1989) Causal stories and the formulation of political agendas. *Political Science Quarterly* 104: 2, pp.281 – 302
- Trexler, M., Broekhoff, D., and Kosloff, L. (2006) A statistically-driven approach to offset-based GHG additionality determinations: what can we learn? *Sustainable Development, Law and Policy* 6, pp.30 - 44
- Weale, A. (1992) *The new politics of pollution*. Manchester: Manchester University Press
- Wood, L., and Kroger, R. (2000) *Doing discourse analysis*. London: Sage
- WWF (2007) WWF submission to the EU Emissions Trading Scheme Review. June 2007. [Online]. Available from: http://ec.europa.eu/environment/climat/emission/pdf/solveig/wwf_0607.pdf [Accessed on 26/05/10].
- WWF (2008a) Freezing climate change: WWF position statement – EU Climate & Energy Package. Access to emission reduction credits from outside the EU Why Europe needs to move beyond the mindset of offsetting. June 2008. [Online]. Available from: http://www.die-klima-allianz.de/wp-content/uploads/8-wwf_hintergrundpapier_cdm_engl.pdf [Accessed on 27/05/10].
- WWF (2008b) *MEP Briefing: Is the UK sliding towards 'offset Europe'? Has it given up on keeping the world below 2°C, or even 3°C global warming?* [Online]. Available from: http://assets.wwf.org.uk/downloads/mep_briefing.pdf [Accessed on 03/06/09 27/05/10].
- WWF (2009) *WWF position paper: climate change in the 2009 EU Spring Council*. Brussels: WWF
- Zito, A. (2001) Epistemic communities, European Union governance and the public voice. *Science and Public Policy*, 28: 6, pp.465 – 476

Personal Communication (p.c.)

Joris den Blanken	EU Climate & Energy Policy Director, Greenpeace Europe
Sanjeev Kumar	EU ETS Coordinator, European Policy Office, WWF
Tomas Wyns	Senior Policy Officer, Climate Action Network (CAN) Europe
Marlene Grundstrom	Policy Officer, Climate Change and Development, Aprodev
Romain Philippe	Policy Coherence for Development Officer, Confederation for Relief and Development (CONCORD)
Tim Gore	Climate Change Advisor, Oxfam International
Eva Filzmoser	Project Coordinator, CDM Watch