

No City Left Behind

Europe's cities as advocates for a Just Transition



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Abstract

Europe's transition towards a net-zero emission economy and society, needs to be designed in a fair and equitable manner. Despite the urgency for action, the term *Just Transition* has increasingly been turned into a catchphrase that is difficult to grasp. In the EU's multilevel governance structure, municipalities as implementers of EU policies play a crucial role in the transformation process. This thesis studies their roles as interest-driven, pro-active advocates towards the EU institutions by examining their efforts to influence the EU's policy formulation process on Just Transition matters. The analytical framework of *vertical venue-shopping* provides guidance when assessing municipalities' socio-economic interests and motivation to target the EU institutions as venues of choice. The study's material consists of advocacy documents from European cities and respective networks and is complemented by interviews with their representatives. A qualitative content analysis identifies inclusiveness of the policy process and access to funding as the cities' main interests. Municipal advocacy activity on the EU level is motivated by implementation issues of policies on the ground as well as conflicts of interest between cities and their national governments.

Key words: Just Transition, European Union, cities, vertical venue-shopping, multilevel governance

Words: 19.500

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List of Abbreviations

AEBR	Association of European Border Regions
AER	Assembly of European Regions
CALRE	Conference of European Regional Legislative Assemblies
CCRN	Capitals and Capital Regions Network
CEMR	Council of European Municipalities and Regions
CoR	Committee of the Regions
CPMR	Conference of Peripheral Maritime Regions
EBI	European Investment Bank
EEA	European Economic Area
ESF+	European Social Fund Plus
ERDF	European Regional Development Fund
EU	European Union
ICLEI	Local Governments for Sustainability
JT	Just Transition
JTF	Just Transition Fund
JTM	Just Transition Mechanism
MEP	Member of European Parliament
MPF	Multiannual Financial Framework
MLG	Multilevel Governance
NCEPs	National Climate and Energy Plans
NGO	Non-governmental organization
PemRep	Permanent Representation
V4 capitals	Visegrád capital cities

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1 Introduction

The von-der-Leyen-Commission declared the European Green Deal to be its top priority. The European Green Deal was presented as the road map which will ensure Europe's climate neutrality by 2050. The European Commission has clearly stated that this transformation towards a low-carbon economy must be a Just Transition, meaning that the shift "must be conducted in a fair and inclusive way" and promised to "leave no one behind". (European Commission, 2019, p. 16) At that, its understanding focuses on supporting those regions in Europe that are most affected by the transition as they are heavily dependent on emission-intensive energy production and industry. In that light it needs to draw on a broad spectrum of policy areas and instruments. Despite the urgency to advance concrete climate policies, *Just Transition* has been increasingly turned into a catchphrase and is used by all types of different actors to justify actions broadly related to transition policies.

Just transition is a broad concept in itself. For Heffron/McCauley it "captures the 'just' process when societies move towards an economy free of CO₂ emissions." (2018, p. 74) Both in political debate and scientific literature from different disciplines, Just Transition comprises various elements of justice, ranging from global climate justice, the burden-sharing between different regions, energy poverty to community empowerment. This thesis focuses on the feature of multi-level stakeholder involvement. Falkner (Falkner, 2019, p. 270) acknowledges the increasing embedding of justice in global climate negotiations, which means new actors are involved in the governance process. The European Commission seems to recognize this need and intends to be in "an active social dialogue" with the effected stakeholders. (European Commission, 2019, p. 16)

With the growing prominence of Just Transition on the European political agenda, municipalities¹ are one of the (not so new) actors working their way into a brighter spotlight. Municipalities are the legal entities which host the variety of actor groups that are differently affected by the transition process (see Green & Gambhir, 2019). Since municipalities are the prime implementors of transition policies, they are the ones that need to deal with different interests of different actors.² For instance in Greece, it is local mayors in coal regions who fight for a just transition for their citizens and against national plans. (Popp, 2019) Hence, it is important

¹ The terms 'municipality' and 'city' are used interchangeably throughout the thesis. Further explanation see sub-section 2.1.4.

² Even though current European debate primarily centers around coal regions and consequences of structural changes caused by the energy transition, it appears much more interesting to investigate the role of the local – instead of regional – level. From a more practical point of view, it is more feasible to investigate the relationship of cities and the EU level, than regions (as jurisdictions) and the EU level. All member states have very distinct features of a rather federal or centralistic state. (Callanan & Tatham, 2014, p. 188) Therefore, competences and responsibilities for the just transition as well as their level of independence vary largely between countries, which makes it difficult to draw more general conclusions from regional activities towards the EU. This has been confirmed in early research by Marks et al. (1996) who point to a clear correlation between the level of regional autonomy in a member state and regional representation in Brussels. Whereas, cities' activities in Brussels are barely influenced by differences between local authority systems of individual member states. (Schultze, 2003)

to recognize their role in governance processes not only in the global context, but more concretely in the European multi-level governance system. This is where the Just Transition's feature of multi-level stakeholder involvement plays out: municipalities are one of the actors in the system which seek involvement on the European level.

This thesis wants to examine municipalities' efforts to influence the EU's policy formulation process on Just Transition.

This research interest is tackled by posing a first overall question and two sub-questions:

- (1) In what way do municipalities proactively engage in EU policy formulation processes?*
- (2) Which concrete interests do they promote?*
- (3) What motivates them to advocate their interests directly towards the EU institutions?*

1.1 Locating the Gap(s)

Despite the by now established affirmation of cities as crucial actors in climate change and transition policies, after an in-depth literature review several gaps in scientific literature can be pinpointed. They serve as the study's scientific rationale. The urgency of the topic as such and the present political agenda act as its societal and political rationale. By locating the interface of different gaps this section creates the context within which the research questions are placed.

1.1.1 Scientific Rationale

Just Transition was first mentioned as early as the 1980s, but the understanding of the notion has widened over time and became a highly interdisciplinary research field³. The term originates in trade union movements in the U.S. that protested about stricter regulations on air and water pollution which forced certain industries to shut down (Newell & Mulvaney, 2013, p. 133) and since then rooted in collaborations on 'green jobs' (McCauley & Heffron, 2018, p. 1) as high as on the UN level (Healy & Barry, 2017, p. 454). Literature on early transitions concentrates on the U.S. (Strobo, 2012), Australia (Evans & Phelan, 2016) and (South) Africa (Swilling, et al., 2016). The core concept of Just Transition covers the shift from coal, peat and oil shale energy production to gas and renewable energies. Based on its origin it deals with the compensations for job losses, re-skilling of workers and structural community support (see also the role of trade unions Stevis & Felli (2015). However, as Healy/Barry (2017, p. 451) point out, there is a lack of literature which takes into account the entire lifecycle of energy production and consumption,

³ See Heffron (2018) for a very interdisciplinary approach on tackling Just Transition.

because it mostly looks at separate sections of the transformation. A wide literature also covers the more technical elements of energy systems, while questions about energy poverty and justice are gaining relevance as well (see Newell & Mulvaney (2013)). More recently scholars have opened-up to the transition towards a ‘green economy’. Hence, policy areas that are discussed now range from finance (Ryszawska, 2016), to smart technologies (Ngar-yin Mah, et al., 2012), transportation, zero-waste and agriculture (Blattner, 2020). In that way, the Just Transition literature has a central place in the general climate and environmental justice debate.

The broader research on climate change and energy transition politics assigns great importance to cities and local communities in advancing action. Over the last two decades increasingly much attention has been paid to the role of cities in global negotiations as well as their function as hubs of innovation. (Betsill & Bukeley, 2006) Remarkably, cities played an important role around the negotiations of the Paris Agreement. Earlier Hakelberg had recognized that cities’ importance in the global governance setting was growing, as focus moves

“away from a centralized multilateral regime, in which progress depends on agreement among national states, and toward a more fragmented, polycentric, and transnational regime complex, in which action is taken at multiple levels and by a diverse set of actors.”
(Hakelberg, 2014, p. 107)

In this regard cities, in particular when joining forces in different international city networks and coalitions, are considered driving factors for the reaction to climate change, “sometimes filling the vacuum left by national governments’ inaction” (Bulkeley, et al., 2011, p. 29). Hence, many studies frame local actors as the ones stepping in for national states that are incapable of committing themselves to offer and implement solutions. This attitude is not limited to the global stage but is observable in the European context as well.

Cities and local communities in general are considered as hubs of innovation for new socio-technical approaches to the energy transition as well as playgrounds to test them out. (Jørgensen, et al., 2015; Späth & Rohrer, 2012) European case studies tend to pick out a number of pioneering cities that invest comparably extensive resources in transition policy measures. Most of those leading examples are located in EU member states that have relatively strong climate policies in place, such as the Nordics, Germany, the Netherlands or Belgium (see Lenhart, et al., 2014; Schreurs, 2008; Ehnert, et al., 2018; Nevens & Roorda, 2014). Very few studies cover practices of cities in Eastern Europe (see e.g. Miezis, et al., 2016). Studies deal with the design, implementation and evaluation of transition policies or single experimental projects. (see Evans, et al., 2016) An extensive amount of literature concentrates on multi-level governance approaches within a municipal jurisdiction, tackling practices on which types of stakeholders to involve in policy processes, who to compensate, or which groups require empowerment. (see e.g. Emelianoff, 2014; Khan, 2013; Nevens, et al., 2013; Mees, et al., 2019)

The research gap which this thesis intends to address regards the advocacy activity of Europe’s municipalities towards the EU. Within the multilevel system of the European Union, above mentioned scholars view the local level as the

implementor of transition policies, including pioneer cities that take further steps than the minimum climate commitments higher governmental levels would require them to take. Literature on the “wider multi-level governance context” (Ehnert, et al., 2018, p. 102) and interplay of levels is scarce. Many intend to investigate active municipal involvement in European politics on the matter, yet their research often portrays local bottom-up activities towards EU institutions as primarily sharing best-practices between successful transition project leaders. (see Kern & Bulkeley, 2009). This applies both to actions of individual cities and concerted activity through pan-European networks and associations of local actors. In sum, there is a general lack of research on cities as active advocates for a Just Transition in the EU’s policy making structure.⁴

1.1.2 Political Rationale

This study has three main political rationales: the urgency of the just transition, implications for European cohesion policy as well as the EU’s governance structure.

Firstly, if the vital transition towards a low-carbon economy is to be implemented, it undoubtedly should happen in a fair and equitable manner. This follows the simple logic of any other reform policy (Finnegan, 2019): an un-just transformation would mobilize great resistance among the immediate ‘losers’ of the transition. Healy/Barry (2017, p. 455) warn about the risk of forfeiting public support without strong transition policies in place and entire communities who mobilize against decarbonization. To avoid that, public recognition of those facing the short-term negative consequences is important. (Green & Gambhir, 2019, p. 9) In that sense, a further key to success, is multi-level stakeholder involvement.⁵

Secondly, the above outlined research gap stretches out in the context of cohesion policy. The recently proposed Just Transition Mechanism (JTM) (European Commission, 2020)⁶ has been placed within the toolbox of European cohesion policy. Art. 4 (2) TFEU ascribes shared competence in economic, social and territorial cohesion; Art. 6 TFEU expands those to questions of education and vocational training. Hence, policy measures of the mechanism appear to be well covered under Europe’s regional development domain. However, Europe’s regions

⁴ One possible reason for this gap might be the Committee of the Regions (CoR), which at first sight would be considered the prime medium to formally represent municipalities’ interests in the policy formulation process. However, as Havlík (2014) found out, this is not necessarily the case. Especially smaller towns do not consider CoR as the representative of their interests as often they do not even hold any contact with it.

⁵ In this context the ‘transition management’ methodology to design transition and sustainability policies has evolved. The technique has been first applied by the Dutch government and seeks to integrate input from stakeholders from different backgrounds. Large emphasis is put on (policy) learning processes. (see Loorbach, 2010)

⁶ The Just Transition Mechanism is a proposed legislative package that foresees financial support from different sources (EIB, InvestEU). Core instrument is a Just Transition Fund (JTF) which - besides its own rather small budget - ‘mobilizes’ capital from different funds, most of them being traditional cohesion policy tools (ERDF/ESF+). It further offers technical assistance for instance on designing Transition Plans.

and municipalities are concerned with whether the Just Transition would be funded from cohesion policy or within cohesion policy. (Sánchez Nicolás, 2020) The topic is thus of high (budgetary) salience for local actors.

Thirdly, the local level, notably municipalities, seem to become increasingly assertive towards their national governments. The research gap's topicality is driven by recent endeavors of the Visegrád (V4) capital cities which joined forces in a *Pact of Free Cities* to convince the EU to allocate direct funding and support cities in their efforts to enable the green transformation. (Alpár, 2019; Dunai, 2019; Zalan, 2020) Such aspiration is not unique to climate policies. Representing a pluralistic spectrum of local and regional representatives, CoR has issued an opinion that speaks against conditionality in the next multiannual financial framework (MFF), which would link EU funding to a member state's compliance with the rule of law. It argues that the local level (as a beneficiary) should not become victim of national governments' wrongdoings. (see Resolution 2020/C30/01)

The scientific research gap regarding the participation of Eastern European cities widens when adding political salience. Eastern Europe, the 'new' member states, are on average in a much earlier transition stage than the rest of Europe. This creates a great socio-technological divide between Central-Eastern European member states and other member states. (Popp & de Pous, 2019) It also stresses the urgency to advance concrete actions to prevent a deepening of already existing socio-economic inequalities. This urgency stands in strong opposition to Eastern-European member states' approach of the transformation process. For instance, in late 2019 Poland was the only country which refrained from committing to a climate-neutral Europe by 2050. (Morgan, 2019) Poland, Hungary and the Czech Republic are further known for utilizing their dependency on coal mining and a Just Transition as leverage in negotiations on the MFF. (Morgan, 2020)

Finally, the timing of this thesis comes at a crucial phase of the EU's procedure on climate and transition policies. The European Green Deal is the umbrella document which compiles many different legislative acts, amongst them the ones of the Just Transition Mechanism. At the moment of writing all of them are proposals brought forward by the European Commission and many are open for (public) consultation. Thus, this is the time period in which different interest groups are most actively trying to influence decision-makers. At this point this study adds to ongoing debates and processes and contributes findings which can be made immediate use of.

In sum, the objectives of this thesis meet the needs of the gap in scientific research as well as the political considerations on the impact of climate policies on the future of European integration.

1.2 Objectives of the Study

The study's overarching aim is to analyze through which advocacy activities and with what motivation the municipal level has promoted its interest in EU policy formulation processes on Just Transition.

Just transition is a certainly eclectic and far-reaching topic area.⁷ In order to make a meaningful contribution to the literature, the thesis' scope is concentrated. It engages in the multilevel dynamics of the EU's transition policies by looking at the bottom-up advocacy work of municipalities. In that way it will contribute with a deeper understanding to the salient and highly politicized debate on the design of Europe's Just Transition. Contrary to the majority of studies this thesis shifts the emphasis from concrete policy measures and best practices to processes of policymaking, from different types of stakeholders to the different levels of governance and from reactive actor behavior to proactivity⁸ and by doing so, pictures just transition as a less normatively charged process.

The thesis takes on the perspective of municipalities whose advocacy endeavors are driven by socio-economic interests. This rationalistic-objectivistic stance is reflected in the analytical framework of vertical venue-shopping which examines how and why cities interact with the EU institutions instead of their national governments. Yet, it does not aim to offer deductive theoretical explanations for the (current state of the) municipal advocacy landscape on Just Transitions in Europe. Rather, it seeks to comprehend empirical observations with the guidance of a theoretical concept which would produce results that help to understand and structure dynamics in the debate on Just Transition. This thesis is not a case study, but still it intends to lift Eastern European municipalities into a brighter spotlight. Following a theory consuming approach (see Teorell & Svensson, 2007), highly generalizable results are neither expected nor intended as they would not necessarily serve the study's objectives.

The added value of this thesis is its novel approach of the topic complex. Just Transition as the intersection of a variety of policy areas gains complexity in the EU context in which it has lately been placed within cohesion policy, emphasizing the regional rather than municipal take on it. This study does neither apply the classic climate change lens on municipalities; nor does it theorize about the mobilization of local and regional actors through cohesion policy as the wider EU integration literature cherishes. Instead, it views cities as advocates with socio-economic interests in the Brussels sphere and makes use of a classic in public policy research to examine this phenomenon in the Just Transition policy-making process.

Altogether, through the study's explorative character it seeks to depict the various dimensions of the Just Transition in the EU context. It intends to scratch upon the manifold implications which can derive for the European project as such and path the way for further research in this newly evolved research gap.

⁷ Which is wider than the European Commission's Just Transition Mechanism and Fund proposal as part of the European Green Deal.

⁸ Heffron/McCauley (2018, p. 75) believe to find the core of injustice of transition processes in the reactivity of both politics and research; solutions are applied (or investigated) once the problem has already occurred.

1.3 Limitations

Despite the thesis' rather wide-ranging research interest, its objectives set quite clear limitations to its breadth. This section outlines those limitations.

When talking about Just Transition the first and most burning question to be discussed is naturally: What is just? It appears rather impossible to answer this question without delving into highly normative argumentations and hence would require a very different epistemological and ontological approach than the one that is followed here. The paper wants to analyze how and why cities promote their interest; it does not want to assess the level of fairness or normative foundation of these interests.

Another delicate issue emerging from the research interest deals with the actual impact that municipalities' attempts to influence have on policy outcomes. It is not intended to evaluate the results of advocacy activity, neither on the agenda-setting phase nor final policies or any other stage of the process. Impact measurement is a problematic exercise for researchers in the field of interest group representation and lobbying. Amongst others Dür (2008) describes the various constraints to measuring influence, which face further difficulty in the complexity of the EU structure. Instead, this study operates solely on the input side of the political system (see Easton, 1957). In that way the study can focus on the observable phenomena and desist from drawing unreliable conclusions.

Furthermore, there is intentionally no detailed investigation of internal process that actors (municipalities or city networks) follow to form their positions which they then promote towards the EU institutions. This would further collude with questions about the legitimacy of the whole construct. However, the analysis touches upon certain elements.

All results will have to be understood in the light of those limitations.

1.4 Outline of the Study

This thesis is structured as follows: Chapter 2 creates the analytical framework of the study. First, it commences with pitching the context of the research interest with the conceptualization of Just Transition, highlights municipalities' role in the EU's governance system and defines them as advocates. Explications on the researchers understanding of interest lose the section and lead to the core theoretical concept of vertical venue-shopping. Second, the empirical scope of the study is defined by a case selection through the identification of EU policy milestones in Just Transition and the mapping of municipal actors on the issue. Third, the analysis' material and method are explained. The data set consists of two pillars: written advocacy work and interviews with city representatives. Data generation is explicated in two respective sub-sections. Qualitative content analysis as the study's method is described in the following before operationalization takes place.

Chapter 3 is dedicated to the analysis of the data and is structured along the study's three variables: interests, motivation, and advocacy action. It also presents further findings outside this plot. Chapter 3 presents the results while chapter

4 discusses the main findings in relation to vertical venue-shopping and the research interest. The chapter is organized around the study's three research questions to provide clear answers and point to open question marks as well as opportunities for further research. Finally, the conclusion summarizes the study and provides an outlook on Just Transition policies.

2 Analytical Framework

Chapter 2 constructs the theoretical framework and conceptual approach which is used to answer the research questions. Firstly, key terms are clarified. The subsequent section employs the theory of vertical venue-shopping to the phenomena of city advocacy and Just Transition in Brussels. Afterwards the methods section explains the methodological set-up for the theory-consuming analysis. It includes the identification process of suitable milestones, actors as well as the creation of two data sets. Qualitative content analysis is detailed as the tool which is used to engage with the data. The analytical framework is thus a deductive one, which is supported by inductive elements wherever necessary.

2.1 Setting the Scene

Before immersing into the theoretical framework of venue-shopping several basic concepts and positionings require further explanation in this section. Those set the scene in which the thesis' conceptual approach unfolds.

2.1.1 Just Transition

Since Just Transition is such a wide-ranging concept, that offers many perspectives, it is necessary to define its comprehension for the scope of the study. This paper's overarching understanding of Just Transition is more inclusive than the traditional one and looks at the fair transition towards a green economy⁹, instead of exclusively focusing on the departure from fossil fuels and high-carbon industries. In McCauley/Heffron's words Just Transition is "a fair and equitable process of moving towards a post-carbon society." (2018, p. 2) This study shares this core interpretation.

Reflecting this definition, it is to highlight the variety of societal groups that are affected by the transition. Green/Gambhir (2019) point out that in order to

⁹ The concepts of 'green economy' or 'green growth' suggest "that with increased efficiency and new technology there can be increased growth, welfare, environmental protection and CO₂ reductions without increasing ecological footprints or exhausting resources." (Bäckstrand & Kronsell, 2015, p. 13) The United Nations Environment Programme defines green economy as "improved human well-being and social equity, while significantly reducing environmental risks and ecological scarcities." (UNEP, 2011)

formulate effective policies it is necessary to take all affected groups into consideration. The most concerned groups – but not limited to them – are consumers, workers, companies, and specially effected communities as well as states' economies. Consequently, challenges of different nature occur which require tailored solutions. For this thesis municipalities are considered as the entity which hosts this large range of stakeholders and are (supposedly) in charge of defending those groups' interests as their democratically elected representatives.

Against this backdrop, – in the nexus of climate change and energy – there are certain policy areas at the intersection of environmental protection, economics, and social justice (see also del P. Pablo-Romero, et al., 2015, p. 578) that have been identified as being of crucial importance for a just transition and which (especially) play out in towns and urban areas. Those are: the re-skilling of workers, energy poverty, energy efficiency as well as renovation of buildings and other infrastructure, public transport and mobility, environmental awareness and education, green investment and growth as well as smart cities. This list is to be understood as explicitly non-exhaustive. Each municipality faces dissimilar obstacles and opportunities of the transformation. Ergo, the importance they ascribe to different policy domains varies.

Those policy areas are partially reflected in the European Commission's understanding as suggested in its proposal for a JTM for Europe. However, there is at least one fundamental distinction to this study's comprehension. The JTM addresses “regions and sectors that are most affected by the transition towards a green economy.” (European Commission, 2020, p. 1) In fact, its measures are geographically limited to or at least highly concentrated on the most carbon-intensive regions in Europe. Its focus lies heavily on economic support for certain industrial sectors. Whereas the conceptual approach which is developed hereafter grasps Just Transition as a deep societal change that all European regions will be or are currently undergoing. For this reason, this study is neither geographically limited nor bound to particular economic sectors. Thus, this thesis takes on a polycentric perspective on the transformation.

All in all, the thesis has three clear boundaries when it comes to the concept of just transition. Firstly, it does not intend to answer the question of what is “just”. Secondly, it focuses on one cross-cutting element of the policy-making cycle to design the transition in a fair manner, namely multi-level stakeholder involvement. Thirdly, the research concentrates on municipalities, hence only one type of actor among many in the multilevel governance system.

2.1.2 Multilevel Governance

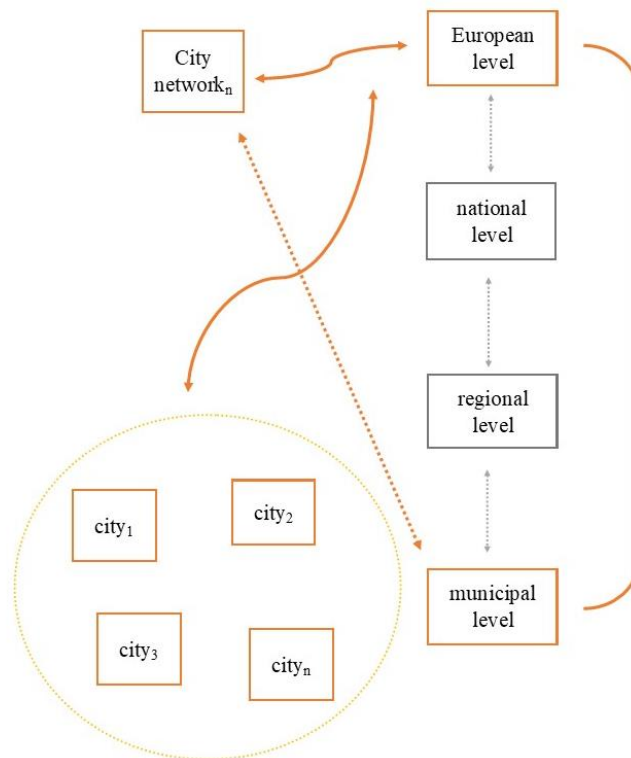
In their special issue Hoppe/van Bueren (2015) suggest that city achievements in the low-carbon energy transition need to be further researched and evaluated in light of the multilevel governance system they are placed in. Multilevel governance is an unavoidable concept when discussing municipalities' advocacy behavior towards the European Union. This sub-section delivers a short overview of relevant

elements which roll out the playing-field for city advocates and define the context for venue-shopping. Many of them are discussed in more detail in the following (sub-) sections.

The multilevel governance concept (MLG) was formulated because state-centric, two-level games explanations of the European Union were unable to resolve sub-national involvement in EU affairs which emerged in the 1990s. (Marks, et al., 1996) MLG is not a theory, but a framework that helps disentangle the complexity of the EU system. Such is its purpose in this thesis as well. The simple illustration of MLG in

figure 2.1 highlights the elements this study is concerned with. MLG is characterized by upwards, downwards and sideways dynamics and interactions of different levels and actors. (see central work by Hooghe & Marks, 2001) Even though literature mostly concerns the role of regional actors and widely ignores the lowest level, Havlík (2014, p. 95) emphasizes that the original concept (see Marks, 1993) explicitly acknowledges the local dimension, meaning municipalities, as actors. The in the follow-

Figure 2.1: Municipalities in MLG



ing developed and applied analytical framework zooms in on cities as constituents of the local level and their (*upwards*) bottom-up interaction with the European level, but *downwards* and *sideways* implications cannot be entirely discounted for a complete scenery.

Municipalities are one type of actor among many others which themselves are active on different levels. Although a broad stakeholder participation (businesses, civil society, etc.) by municipal governments on all levels is crucial as it has been intensely reviewed in literature, the sideways interaction relevant for this study takes place between cities of different member states. They merge their individual vulnerability to climate change and responsibility for the transformation (Toly, 2008, p. 347) in European city networks (Keiner & Kim, 2007) (see further sub-section 2.3.2). The implementation process of EU legislation most aptly describes the downwards mobility from the European level to towns. Situated at the

end of the chain municipalities are the ones that put most of EU legislative acts into effect. However, this often leads to a predicament for them being considered as sole implementors instead of getting involved in the actual policy formulation. This is unfortunate, as “[r]egarding the vertical dimension, cities become particularly relevant whenever they go beyond the role of simple passive implementers and actively interact” with higher levels. (Garcés-Mascareñas & Gebhardt, 2020, p. 3) From their experiences as implementers they can contribute important input to policy design and evaluation. Brussels policy officers and policy makers welcome this type of information. (Broscheid & Coen, 2007, p. 349) In order to draft legislation that is successful and impactful, they rely on input and expertise from different stakeholders. (de Bruycker, 2016)

As cities are mostly studied as interest groups in MLG, some enjoy rather advantaged starting points. The organizational capacity of an individual city impacts its upwards mobility. Determining factors are

“financial and personnel resources, political resources, informational resources and access to technical knowledge and expertise, the extent to which [they] are embedded in formal and informal domestic networks, and the extent to which representative structures are concentrated or fragmented.” (Callanan & Tatham, 2014, p. 190)

Another influential factor is the degree of autonomy a municipality enjoys from higher levels of hierarchy in the respective national system. (see Kübler & Piliutyte, 2008)

The Europeanization concept is often considered as a complementing alternative to MLG which is able to actually explain the reasonable involvement of municipalities in European Affairs. In this context Europeanization refers to the variety of new opportunities which the multilevel EU system offers to cities; it opens up new political spheres that cities can enter. (Heinelt & Niederhafner, 2008, p. 173) Europeanization is to be understood as a key driver of multilevel governance, meaning that it can enhance the development of MLG per policy sector. (Scholten, et al., 2018) It is not only climate governance that became Europeanized (see Kern, 2010), but the entire policy domain of Just Transition is certainly one that especially recently enjoyed a Europeanization boost.

To sum up, EU multilevel governance offers an extensive space to cities and municipalities. The setting allows them to practice bottom-up advocacy activities and engage with EU policy makers. Thus, MLG paves the way for the thesis’ *RQ(1)* and ensuing research questions to be investigated.

2.1.3 Advocacy

Establishing the sort of action and behavior that is investigated, ‘advocacy’ is a central term of this research paper. It is therefore necessary to delineate the meaning of advocacy and the definition of municipalities as the executors of such upwards exercises.

To ‘advocate’ is defined as “to publicly support or suggest an idea, development, or way of doing something” (Cambridge Dictionary) whereas, ‘lobbying’ means “the activity of trying to persuade someone in authority, usually an elected member of a government, to support laws or rules that give your organization or industry an advantage.” (Cambridge Dictionary) The difference between advocates and lobbyists is ergo: The latter follows the principal goal of directly influencing decision makers to implement policy change in its interests. The former publicly – not exclusively towards the decision maker – defends a position or policy interest. Naturally, an advocate would additionally utilize ‘lobbying’ practices to promote ideas and enhance policy change, but those go hand-in-hand with public engagement.¹⁰ In scientific work the two expressions are often used without great attention to their distinctive meanings. Regardless the often lax use of advocacy and lobbying, this study deliberately prefers the term advocacy, as it is more suitable for the type of actor which takes the central role here.

The term ‘advocacy’ is prevailing in the study of the non-profit and NGO sector as well as interest mobilization. Baumgartner (2007, p. 483) draws attention to the matter that researchers concentrate too much on interest groups as the sole advocates, since it is often government officials themselves who advocate for policy change. In this thesis the central subject of investigation is considered as both: an interest group and governmental body. To a certain extent cities behave like any other interest representation in the EU context, by applying similar strategies.¹¹ Therefore, municipal advocacy activity in Brussels is mostly examined with concepts ‘borrowed’ from interest group literature. (see for instance Heinelt & Niederhafner, 2008) However, city delegations are disparate from organized interest as they speak on behalf of the public sector and democratically elected representatives. (Herschel & Newmann, 2017, p. 160) In that sense they gain legitimacy by delivering the local European citizens’ perspective to the policy-formulation process.

Concerning the actor’s absolute size, the terms ‘municipality’ and ‘city’ are used interchangeably throughout the thesis. Not the size of entity, but the level of jurisdiction qualifies for becoming object of investigation of this study.¹² The theoretical framework technically encompasses municipalities of all sizes. It recognizes the fact that the entire local level is affected by the transformation to a low-carbon economy and prevents drifting towards the cleavage of big cities versus rural areas. Despite this aspiration, it is difficult to generate empirical references for it. Sub-section 2.3.2 comes to the conclusion that it is mainly medium-sized or larger cities that are observably active in the advocacy process in Brussels.

¹⁰ Even though an explicit definition is missing in the text, this understanding is shared by Sabatier/Jenkins-Smith (1993) in their leading advocacy-coalition framework.

¹¹ Such would for instance be categorized as inside and outside lobbying strategies. (see Dellmuth & Tallberg, 2017; Broscheid & Coen, 2007)

¹² It needs to be noted that some cities, e.g. Copenhagen, Berlin, Brussels hold the status of a region as well.

2.1.4 Interests

Another reoccurring fundamental term of this research paper is *interests*. In reference to the underlying theoretical conception of the surrounding scene and its epistemological and ontological understanding, the rationalistic-objectivistic positioning requires a brief explanation.

As elaborated in sub-section 2.1.2, MLG has filled a gap that various attempts to explain EU integration have left open and helps to navigate through EU policy-making reality. Nevertheless, for this study core assumptions about interests and actor behavior from institutionalism and policy research are taken on. Premises for the in the following developed framework are borrowed from Scharpf (1997). Keeping core ideas of rational-choice in mind, “political interaction is driven by the interactive strategies of purposive actors operating within institutional settings that, at the same time, enable and constrain these strategies.” (ibid., p. 36) In that sense, actors as interest-maximisers apply certain strategies to their political interaction.

Against this backdrop, this thesis takes on the following position: Municipalities are actors which have realized the urgency of a shift towards the green economy. Being the ones facing immediate and long-term consequences they have an (or many) socio-economic and socio-ecologic interests in a just transition. Proactively advocating on the European level constitutes one way to maximize those interests. All related actions are carried out intentionally and purposefully, meaning they pursue a certain strategic goal.

Based on that and previous elaborations, this study assumes one core municipal interest, which all actors share: inclusiveness of the Just Transition. This refers to the studies understanding of ‘just’ as the inclusive design of the policy formulation process with regards to the transformation. Inclusiveness of the process further relates to strategic actor behavior. Being included in the policy process, paves the way for effectively advocating for all remaining socio-economic interests in Just Transition.

In addition, inclusiveness reinforces European legitimacy. The study’s political rational scratches upon question about legitimacy of the EU and its cities in current dynamics around Just Transition policies. Concerning Scharpf’s (1999) conceptualization of input and output legitimacy, the thesis thematizes different dimensions of an inclusive transition process as both input and output legitimacy. A prime example of how procedural justice (inclusiveness) is intended to increase European legitimacy is the partnership principle. In 1988 the partnership principle was formally enshrined in cohesion policy so that municipalities and regions would (theoretically) be equipped with larger leverage in the design of funding schemes and to improve communication channels between the EU and subnational levels. (Jefferey & Rowe, 2012)

When it comes to strategy: as stress in sub-section 2.1.2 proactive, bottom-up advocacy activities are concerned in this study. Proactivity in contrast to reactivity reflects the independency and confidence of cities as advocates and promoters of their interests. It emphasizes the intentionality of actions. Hence, proactive actions are dissociated from calls to action initiated by the EU institutions, such as thematic platforms of the European Commission or institutions directly

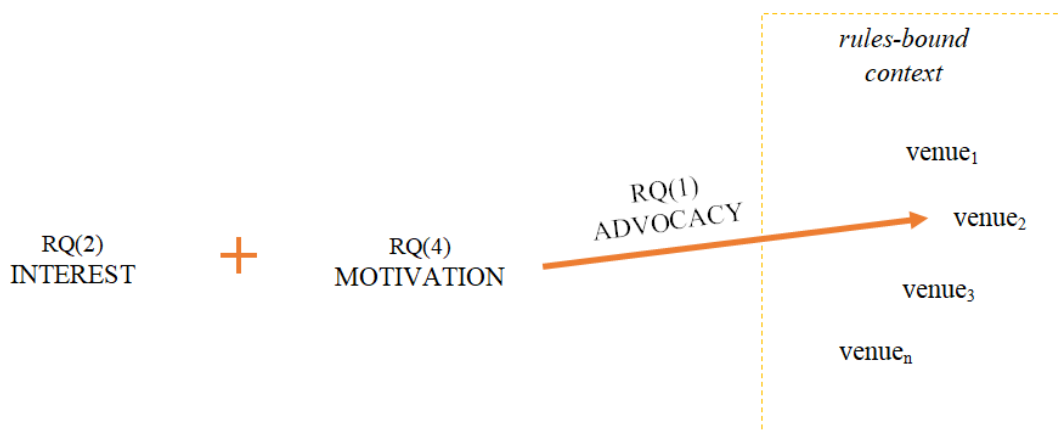
approaching city networks. Certainly, those are important and gladly used gateways to get involved. However, – in contrast to bottom-up actions – they assign municipal actors the role of discussants who bring ideas and share best practices, rather than the one of advocates of citizens’ interests. (La Porte & Pavón-Guinea, 2018, pp. 53-54) Proactivity as referred to in the following, is neither to be understood as radical agenda-setting aspiration, but sole positive engagement in the policy-formulation process.

The sum of those understandings of Just Transition, MLG, advocacy and interests guide the actions for the further path of the research design.

2.2 Vertical Venue-Shopping

The core theoretical assumption of this thesis goes as follows: the above outlined concepts interact with each other. The EU’s multilevel governance system creates a certain polity structure within which the transition to a green economy is governed. This structure and its different levels offer a variety of political access points (venues) to municipalities which they can address as advocates. Being interest driven actors, they choose to advocate towards those access points which are most supportive to their interests. A motivated strategy encourages the choice of venue. Strategies might be revised as interests or opportunities change over time. These theoretical assumptions are illustrated in figure 2.2 and correspond to the framework of *vertical venue-shopping*. The three variables can be understood as independent (interests), intervening (motivation) and dependent (advocacy). However, it needs to be noted, that it is not intended to test causality between the elements of the analytical framework in the further analysis. The following section details the different elements of the framework and how they help to address the posed research questions.

Figure 2.2: Vertical venue-shopping



Early on Marks et al. (1996) put forward the idea that the multilevel governance concept casually tenders incentives to local level actors to bypass superior levels with the intention to interact with the EU instead. They call this phenomenon ‘multiple cracks’, which they define as the “strategic exploitation of multiple points of access”. (ibid. (p. 171) Interest groups scrutinize where in the fragmented polity they can exert influence and accordingly choose an access point. These first thoughts have been further developed by several scholars who take up the theory of policy venues first introduced by Baumgartner/Jones (1993) and translate it to the European context. They either call it ‘multilevel venue-shopping’ (Beyers & Kerremans, 2012) or ‘vertical venue-shopping’. Para-diplomacy is another very similar concept to it. (see Tatham, 2013) Baumgartner (2007) himself encourages the usage of venue-shopping as a concept in EU multi-level governance.

There are several reasons for why vertical venue-shopping is chosen as an eminently convenient approach to give the study’s empirical research interest theoretical guidance. The main analytical tool for this paper’s research interest is based on work by Virginie Guiraudon (2000), who poses an in nature very similar research question about the internationalization of migration control policy and can be considered the originator of vertical venue-shopping. She stresses that as an analytical framework venue-shopping is no ‘explanatory device’, but it allows the researcher to ask the relevant questions: (2) Which motives are behind vertical venue-shopping, (3) why does it happen and (1) with what means is it practiced? (Guiraudon, 2000, p. 258) Those resemble the research questions of this thesis: (1) *In what way do municipalities proactively engage in EU policy formulation processes?* (2) *Which concrete interests do they promote?* (3) *What motivates them to advocate their interests directly towards the EU institutions?* Thus, the theoretical framework assembles very well with the ‘theory consuming’ objectives of this study and serves the purposes of exploring municipal advocacy. Its coverage is wide enough to provide for all questions. Further, despite its primary application in migration policy research, (vertical) venue-shopping is a remarkably flexible construct. As a classic in public policy research, its principle purpose is to explain (rapid) policy change much like the transformation to a low-carbon Europe has been and requires to be even faster in the future. Sharing the same intent there are certain parallels to detect between migration policy and the sphere of Just Transition within the EU. For instance, one of them being the fact that when member states fail to agree on common legislature or simple action, the local level needs to step in. This is depicted by a recent study on Barcelona becoming a city of refuge. (Garcés-Mascareñas & Gebhardt, 2020)

Because of its high flexibility, the framework’s venues and actors are not fixed. Practitioners of venue shopping have been administrative policy officers and interest groups, but also member states (Kaunert & Léonard, 2012) and the European Union (Damro, 2006) itself have been investigated when exercising venue-shopping in the international arena. Thus, cities as advocates – considered as both government officials and representative of certain interests – qualify for a venue-shopping tour. The definition of venue is equally adjustable to the context of investigation. Broadly phrased, venues resemble the political arena; a venue is the

“setting, environment, rules or institutions in which a political decision is made”. (ibid. (p. 870) In the EU structure this can either be the different levels as such or more concrete access points on one level. On the European level this could be the European Commission, Members of the European Parliament (MEPs), the Council Secretariat etc. (Beyers & Kerremans, 2012, p. 275) On the national level most relevant would be federal ministries or Permanent Representations (PemRep) in Brussels.¹³ Since this paper is not primarily interested in who (which institution) municipalities interact with in the first place, but with which means and why they prefer the European level over the national level, for this study the sum of European level and national level access points represent the venue of highest interest.

However, venues – the two levels and their respective points of entry – are not isolated but constitute a system of venues which can cause either stability or change. A shopping tour through the system of available venues is at least partially restricted by a rules-bound context. Meaning, one cannot simply shop as one wishes. Governing rules of the context are the fixed polity structure of the EU or the formal and constituted policy processes: which level possesses what competences, who is responsible for what or how is formal (interest) representation administered. Just Transition faces a particularly complex composition of a rules-bound context, as it draws on components from different policy areas, hence different applicable rules. Venues “are not only a cause of change; they are more often in fact a cause of stability and frustration to those who are left out.” (Baumgartner, 2007, p. 484; see also Princen, 2010, p. 37)

To uphold the logic of venue-shopping a venue shift, must still be possible, as this is the enabler of policy change. Baumgartner/Jones (Baumgartner & Jones, 1991) would argue that venue shift is closely interlinked with issue framing.¹⁴ Since the research interest of this thesis is not concerned with the actual impact of municipalities’ advocacy efforts on transition policies, venue-shopping is considered as a tool that cities make strategic use of to promote their interests; whether it is successful or not is a different question. A possible way out of the polity-imposed deadlock is engagement in more informal – meaning less rules-bound – governance practices. (La Porte & Pavón-Guinea, 2018) Brussels offers a wide range of opportunities for different types of actors and stakeholders to interact in a less formal contexts as well as more institutionalized, parallel structures to the pre-defined polity of the EU. Those will not be of further importance for the study, but to note that they widen the range of political access points for municipal advocates.

The strategy an actor pursues to strike the most suitable venue and to get the best out of the interaction with the venue is an intentional and interest driven one. For the research questions of this study, municipalities must primarily make a general choice between two venues: the national level or the European level. Ergo they have two paths of action to follow when they want to influence EU policy formulation: a) either they intentionally bypass their respective national levels and

¹³ The regional level as the third layer in the MLG model and its relation to national and European actors, offers an additional option to engage with. However, as stated earlier, subnational state organization in the EU is too diverse to take city – region interaction in further consideration in this study.

¹⁴ For a study on the mutual reinforcement of framing and venue-shopping in the EU context, see Littoz-Monnet (Littoz-Monnet, 2014).

directly advocate towards European institutions or b) they try to influence their national government's position so that their interests are reflected and leave it up to them to defend those in Brussels. Beyers/Kerremans (2012, p. 264) find MLG encourages interest groups to develop different strategies for different levels.¹⁵ Possibly one must follow a trial and error approach in order to identify the ideal venue that shares one's ideas.

So, the follow-up questions to that would be: Why do actors prefer one venue over another and how do they access them? These correspond to *RQ(3)* which asks about the motivation behind municipalities advocacy towards EU institutions and *RQ(1)* which covers the actual advocacy action. There are certain circumstances that favor or constrain an interest group's access to each level. Some fuel a bypassing behavior, others accommodate a more cooperative approach. 'Bypassing' as a concept here refers to "open conflict between the state and its" (Tatham, 2013, p. 65) subnational level, in this case municipalities, which either takes place unnoticed or is tolerated by the national government. There are three main types of constraints that hamper cities to turn to national levels as their natural ally. Vice versa those constraints function as enablers and incentives for vertical venue-shopping to actually happen and make municipalities turn towards access points on the European level instead.

Firstly, general obstacles and opportunities of interest mobilization apply to all levels. Section 2.1.2 explained how municipalities face similar (organizational) difficulties as interest groups. Consequently, cities that are for instance domestically well connected and enjoy a stable financial situation can rely on those in the European context as well. In the following those circumstances are called 'domestic contingency'. No matter how advantaged a city is from the beginning, the incentive of policy change must have high enough effects for them to invest additional resources in advocacy work towards the European institutions. (Beyers & Kerremans, 2012, p. 268)

Secondly, the domestic political opportunity structure influences the likelihood of activity on the higher level. (see for this Poloni-Staudinger, 2008; della Porta & Caiani, 2007) When cities are denied access to national venues - this can be because of institutional features or competitive elements - they are more likely to turn towards the EU. This accounts especially when their interests and concerns do not receive the attention they feel they deserve and become marginalized. (see on that matter Fairbrass & Jordan, 2001) In this case EU venues appear more accessible and serve as a compensation for a lack of domestic access and attention.

Thirdly, perhaps the strongest incentive to bypass national governments, is posed by domestic policy makers who act against the position of an interest group. (Beyers & Kerremans, 2012, p. 269) Strategic bottom-up advocacy towards the EU is most "evident in cases where cities have used venues [...] to voice criticism of, or even outright opposition to, policy choices made by the central state." (Kübler & Piliuteyte, 2008, p. 361) In such cases national points of access are entirely closed to cities' interests or not even considered as such and the EU appears

¹⁵ This can be further researched through different access strategies that interest groups make use of. For instance, Bouwen/McCown (2007) compare lobbying/advocacy to litigation at the European Court of Justice or de Bruycker (2016) on information access strategies.

to be the natural ally. Transition policy expectations can diverge hugely between cities, that face the immediate impact, and national governments that need to satisfy a much larger and possibly more diverse territory.

Once decided which level of venue should be targeted, the next strategic step is about how to address them. There are unlimited options for concrete advocacy actions, ranging from bilateral talks, to issuing policy recommendations or running campaigns. The most suitable ones differ from issue to issue. Their particularities shall not be of further apprehension for the analytical framework. More interestingly, cities could go shopping as individuals or in groups.

Municipalities extremely rarely (if ever) play a lone hand in advocacy. Havlík (2014, p. 105) finds that surprisingly they are not even overly active in submitting contributions to public consultations of the European Commission when it comes to cohesion policy topics. Outside of manifested networks and associations they often join forces with like-minded cities on a shared interest or on specific occasions, to then realize consolidated actions. For example, the earlier mentioned *Pact of Free Cities* issued a joint letter to the presidents of the EU institutions; on its path to becoming a city of refuge Barcelona gathered with like-minded cities in its mission to stir up European migration policy. (Garcés-Mascareñas & Gebhardt, 2020)

Cities appear in even bigger groups when they associate in networks to increase the advocacy pressure on the venue of choice. Network formation is a common phenomenon in venue-shopping practices. Those can be explained by borrowing Keck/Sikkink's (1998) boomerang effect. Originally designed to explain transnational networks of NGOs, it can easily be transferred to the European context and advocacy by municipalities. Whenever domestic channels for exchange between governments and interest groups are blocked and they cannot get their message through, "domestic NGOs bypass their state and directly search out international allies to try to bring pressure on their states from outside." (ibid. (p. 12) Thus, when bypassing is the intended strategy, advocating as a European network is a standing to reason approach. The positive effects can accelerate when those European city networks form coalitions among each other or with interest groups of different constituencies that pursue similar interests in Just Transition matters.

This section finalized the theoretical framework through which the study's research interests is approached. The next step is the selection of the empirical context.

2.3 Case Selection

This section illustrates the multipolar features that pitch the study's population and data collection later on. It describes the milestones in European Just Transition policies as well as relevant major actors for related advocacy. Those will determine the sampling of written documents and interviewees in the following sub-sections.

2.3.1 Policy Milestones

The list of policy areas identified in sub-section 2.1.1 is extensive, but not exhaustive. For the feasibility of the research scheme it is not attainable to take all topic areas into consideration. Instead several milestones of the last 10 years are set to function as points of reference for the creation of the data set and further analysis. Those are chosen purposefully on criteria of generalizability and relevance for cities and the general European political agenda.

The timeframe of (approximately) the last ten years is carefully considered upon mostly two reasons: A longer time period would warp the role of Eastern European cities, which are meant to find particular recognition in this study. All of them having joined the Union only in 2004 or later, meant that it required some time to integrate in Brussels' city networks (Kern & Bulkeley, 2009) and get acquainted with common advocacy practices. Additionally, ten years appears to be a sufficiently long time to trace possible signs of change over time in advocacy activities. A much longer one would distort the analysis since the number of the local level's representational EU offices and related politicization accelerated in the 1990s and early 2000s.

As the study does not assess the agenda-setting ability of municipalities, the analysis will focus on municipalities' reactions to ongoing debates and their involvement therein. Thus, milestones are defined as concrete policy frameworks or legislative acts or Commission proposals of such. Further, they are not limited to the cohesion policy domain. Policies which fall under this paper's definition of Just Transition are – and have been in the past – governed under different umbrellas and through different framework programs¹⁶. This leads to three milestones to build the analysis on:

- The European Green Deal, especially the Just Transition Mechanism
- Cohesion policy post-2020
- Clean Energy for all Europeans Package

Figure 2.X displays the relevance of each milestone and relation to the Just Transition policy process until now. Time period refers to the years a milestone has been target of advocates and lobbyists. The Green Deal and consequently the JTM, including the JTF, are the most current and standing to reason milestones as they determine Europe's future policies on the shift to the green economy. Being mostly implemented through cohesion policy its instruments have very factual implications on the local level. The Clean Energy for All Europeans Package completed in 2019 facilitates the rather technical dimension of the shift from fossil fuels.¹⁷ The two (amended) Directives on Energy Efficiency and the Energy Performance of Buildings carry specific elements of a Just Transition, such as renovation costs for households. to the procedural character of the transformation to a low-carbon economy,

¹⁶ For instance, municipalities have been beneficiaries of LIFE (environment) and Horizon2020 (research and development) funding for projects which contribute to the Just Transition.

¹⁷ For a comprehensive overview of the policy package, consult the European Commission's website: https://ec.europa.eu/energy/topics/energy-strategy/clean-energy-all-europeans_en

Figure 2.3: Milestones in the Just Transition policy process.

Milestone	Time period	Role in the JT process	Implications for local level
European Green Deal (Just Transition Mechanism)	2019 – ongoing	Umbrella document and main determinant of future goals, policy instruments and financial tools	- major targets for orientation - JTF: access to funding
Cohesion Policy Post-2020	2017 – ongoing	- steers JT policies in regions and the local jurisdictions - balancing unequal burdens among territories - major source of funding	- major source of funding - by that shapes the leeway for concrete JT actions - policy implementation on the ground
Clean Energy for all Europeans Package: - Energy Performance of Buildings Directive (EU2018/844) - Energy Efficiency Directive (EU2018/2002) - Governance Regulation (EU2018/1999)	(2013) 2015 – 2018	- implementation of energy union strategy - (technical) facilitation of the transformation - improving the general energy efficiency - drafting of NECPs ¹⁸	- energy efficiency of municipality owned building infrastructure - impact on consumers (behavior and costs) - impact on industry and businesses in the municipality - involvement in drafting of NECPs

currency of the topic on today’s political agenda and the fast-paced dynamic developments of its context, it is reasonable to include milestones that have not been completed yet. By this it is referred to the fact that municipalities continuously practice advocacy work on those acts of legislation. Nevertheless, this is not to be regarded as a weakness of the analytical setting since it satisfies the study’s aim and aspiration of generalizability.

2.3.2 Municipal Actors

Around these milestones (and beyond) a non-exhaustive group of major municipal actors practice advocacy. This group and its work constitute the study’s population from which document sampling is conducted. For a better visualization it is further subdivided into city networks and individual cities.

¹⁸ NECPs are National Energy and Climate Plans which each member state establishes to reach respective targets.

Individual Cities

Since the study is not primarily concerned with who advocates, but what for and why cities participate, no systematic identification process was followed. Cities mostly present their actions in coalition with others. Addressing the research gap, close attention was paid to incorporate consolidated activities that include actors from Central-Eastern Europe. Referring to the official list of representations registered with the CoR,¹⁹ it is further recognized that smaller municipalities and towns are often represented by associations, such as the *Swedish Association of Local Authorities and Regions* or the *Association of Estonian Cities and the Association of Municipalities of Estonia*. Sampling is neither limited to cities with an EU office in Brussels, because even without a representational office cities can have very active units on European affairs within their administration at home (Schultze, 2003, p. 122).

Keiner/Kim (2007) map the most active cities in European sustainability networks. The only Eastern European city they identify is Riga. Labaeye/Sauer (2013, p. 22) confirm that there is a huge divide in membership from Western and Eastern European regions in transition networks. Those studies clearly require an update, but it appears obvious that Eastern European cities – although they might face the greatest challenges – seem to be less involved in advocacy work, be it as active members of a network or in solo efforts. A rough look at membership registers of networks such as CoM or Energy Cities creates the impression that average representation on the topic has not genuinely balanced since the Eastern enlargement. Memberships from Eastern European towns is not comparable to the over-represented Southern parts of Europe.

City Networks

As municipalities rather advocate through networks than individually, city organizations are very active on issues of Just Transition. Through an in-depth inquiry of the Just Transition advocacy sphere in Brussels it was possible to single out both relevant organizations that have specified on energy transition matters and more thematically diversified networks that have engaged on the chosen milestones.²⁰ Figure 2.4 provides an overview of those.

The variety of types of organizations enriches the data set and reflects the diversity of interest representation. It includes big and well-established networks such as Eurocities or Energy Cities, but also more informal ones as the Capitals and Capital Regions Network (CCRN). At the same time, for the analysis it needs to be respected that some of them have a base of mixed members, who are not exclusively city administrations and authorities. Additionally, the listed city networks themselves form coalitions with each other (e.g. the Urban 5)²¹ or regional representative

¹⁹ <https://cor.europa.eu/en/members/Documents/regional-offices-organisations.pdf> [last access 30/04/20].

²⁰ It needs to be noted that with additional milestones that related to other features of Just Transition as lined out in sub-section 2.1.1 (as for instance public transportation), more networks would need to be included in the population.

²¹ Urban 5 = Climate Alliance, Energy Cities, ICLEI, Eurocities, CEMR.

organizations (e.g. Cohesion Alliance)²² as well as the wider interest group sector on climate policies.

Figure 2.4: City Networks in Just Transition.

Network	Members ²³
Capitals and Capital Regions Network (CCRN)	All EU and EEA capital cities
Council of European Municipalities and Regions (CEMR)	100.000 local governments, 60 associations from (beyond) the EU
Climate Alliance	1.837 municipalities from (beyond) the EU
Covenant of Mayors	10.276 municipalities from (beyond) the EU
Energy Cities	Several hundred municipalities and associations from (beyond) the EU
Eurocities	185 cities with a population > 250.000 from (beyond) the EU
Local Governments for Sustainability (ICLEI Europe)	160 local governments and associations from (beyond) the EU

Having identified policy milestones in Europe’s Just Transition and the municipal actors that practice advocacy work in this context, the study’s population is defined. In the following the attention moves to the two empirical pillars for the analysis, the material it works with.

2.4 Material and Methods

This section describes the thesis’ methodological architecture. It is the centerpiece which connects the analytical framework of venue-shopping with empirics that characterize the research questions. The study is descriptive in nature and engages with the empirics of municipalities in the Just Transition via two pillars: written advocacy work and interviews with practitioners. Those pillars are constructed separately as they serve different purposes; they seek to answer different sub-questions. While the generation of their data sets differ, the core methodology remains the same. In both cases a qualitative content analysis is conducted.

The material at hand impacts the study’s generalizability which is rather low, for several reasons: Firstly, the thesis’ declared objectives do not require a high

²² Cohesion Alliance = Association of European Border Regions (AEBR), Assembly of European Regions (AER), Conference of European Regional Legislative Assemblies (CALRE), Conference on Peripheral Maritime Regions (CPMR), Eurocities, CEMR, CoR.

²³ Numbers as of 30/04/20.

generalizability of the results. The aim is not to test vertical venue-shopping, but to explore and examine municipalities' advocacy. It is thus abductive and paths the way for further research. Secondly, Just Transition is a fast-paced and dynamic field of investigation in which actors, policies and context change on a fluctuant basis, which makes generalizable conclusions difficult. Thirdly, the data gathering process of this study was highly restricted by the prevailing COVID-19 pandemic which regrettably did not allow for a higher number of interviews to increase generalizability in such.

2.4.1 Advocacy Documents

The first and supporting pillar for this study's empirics consist of a set of written advocacy documents by above identified key municipal actors. They are the prime source of information to analyze cities' efforts and are expected to first and foremost deliver answers to *RQ(2)* as well as direct answers for *RQ(1)*.

Written advocacy documents form the core and basic instrument of any type of advocacy activity. They consist of position papers and policy recommendations, (open) letters to policy- and decision-makers, or other types of documents such as declarations and reflect their official position on a given issue. Advocates use these documents in order to present and promote their interests towards EU institutions. They increase the credibility of their arguments, e.g. by the number of signatories. Further, a possible change over time could be deduced from this data set.

To improve the reliability of this qualitative study, the data collection process was carried out systematically. Suitable documents were collected from the in sub-section 2.3.2 established major actors and selected along the three milestones in Just Transition (sub-section 2.3.1). The data set farther includes additional documents which are not ascribable to one of the milestones, but address the broader Just Transition interests of an actor, such as manifestos, and were published or issued in the set timeframe of ten years. As the term 'advocacy' is carefully chosen for this thesis, documents are mostly openly published documents which could be derived from the actor's website. However, to create a more complete picture and because not all actors have an equally professional online appearance, advocacy documents were additionally directly requested from municipalities and networks.

The data set consists of 33 documents which can be abstracted from appendix 1. As the biggest and most diverse city network most data originates from Eurocities, followed by the Climate Alliance. Since milestones are interrelated, one document can cover several of them. At the same time one document can tackle a broader policy area that goes beyond the Just Transition milestones and will thus be disregarded for the analysis. The composition of the data set directly contributes to answering *RQ(1)* as those are concrete actions of Just Transition advocacy.

2.4.2 Interviews with City Representatives

The second pillar of the analytical construct of this study focuses on a why-question. It primarily aims to understand the reasons for and motivations behind municipalities' proactive advocacy activities which *RQ(3)* is asking about. Since this type of information is (supposedly) not to be found in the written advocacy documents, the second pillar represents interviews carried out among practitioners of the field. Rathbun acknowledges that interviewing as a data collection method has its flaws, "but on pragmatic grounds, it is often [- and this accounts for this study as well -] the only means to obtain particular kinds of information." (2008, p. 690) As a side-effect it is expected to offer complementary data to the first pillar's data set.

Aim of the Interviews – Why to ask?

Sub-question (3) *What motivates them to advocate their interests directly towards the EU institutions?* asks for the motivation behind municipalities' engagement in the Just Transition policy-formulation process on the European level. The overarching aim of interviewing practitioners in the field is to disclose the driving factors of advocacy activity as well as the strategies behind certain endeavors. Secondary goals are to learn about positionings within the just transition debate and the concrete actions cities take to be heard in Brussels. This can supplement the data set of written advocacy documents and potentially offer hints at the bypassing versus cooperation strategy. Chances of creating a fuller picture, by gaining insights into the (in-official) positions are higher. Thus, interview data helps to improve the generalizability of the study's results.

Interviewees – Who to ask?

Sub-section 2.3.2 describes the thesis' conceptual approach's population as individual European municipalities and networks of those cities active in Brussels. Particular attention is paid to cities in Central and Eastern European regions. To identify the population's sub-set a thorough sampling process needs to be completed.

This study's approach imposes certain selection criteria on the identification of interview partners. The internal organizational patterns of town halls and municipal administrations differ widely, as do the responsibilities of civil servants tasked with transition policies. In order to be able to navigate on the level of analysis of cities and networks as respective unified actors, the interviewees should represent the municipalities' position and actions on Just Transition. Hence, an ideal interviewee has both an overview of cities' own transition policies and commitments as well as its engagement in advocacy work towards the EU institutions. Thus, the sample targets cities' 'chief advocates' who represent their interests towards EU institutions and engage in the policy formulation process. These chief advocates could be the heads of EU Offices or Representations, or the head of the relevant unit of the mayor's office. The same logic applies to interview partners of European city networks: it is either the head of organization or a policy officer responsible for Just Transition.

Based on those criteria representatives of in sub-section 2.3.2 identified municipalities and networks have been contacted via e-mail. To convince them to

participate in this study the approach closely followed Hervey's (2011) advice on how to organize and conduct (elite) interviews. Despite several reminders, the final response rate of all interview request was very low, at around 10%.²⁴ In total four interviews with (Eastern) European cities and one interview with a Brussels-based city network were carried out between 2nd April and 23rd April 2020.

Type of Interview - How to ask?

The interviews lasted between 40 – 60 minutes, depending on the availability of the interviewee. They were conducted online via skype and recorded with the interviewees' consent.²⁵ Further, all interviewees were granted anonymity. Anonymity is especially important since the Just Transition is a highly salient topic and subject to a currently ongoing policy process. Since the aim of this second pillar is to investigate the exact and unfiltered motivational factors which are possibly not openly stated in written advocacy documents, anonymity is key to a significant data generation.

The motivation behind the interviewees' behavior is additionally triggered by the semi-structured design of the conversation. The majority of questions is open-ended. This serves two purposes: they provide enough room and depth for the interviewee to elaborate his/her answer and allow the researcher to remain open to new or different viewpoints despite mainly deductive questions. (Drisko & Maschi, 2015, p. 101) Possible follow-up questions are both open-ended and closed. Where the conversation allows for it, questions that are indirect and would require the interviewees positioning ('Some say x, others say y, what would you say?') are posed or counterfactuals are offered. This technique intends to spark more reflective answers from interviewees. (Rathbun, 2008, p. 693)

Interview Guide - What to ask?

The interview guide serves as a point of orientation during the semi-structured conversation but is not to be considered as cast in stone. In light of the study's explorative nature, different interviews take different directions depending on the interviewees' perspective. There are two separate interview guides for the two types of population, with targeted question themes. (see Annex 2 and 3) Both guides are split in two parts. The first part covers rather general questions about internal and external practices of advocacy activities. The second part comprises more tailored questions that deal with Just Transition policies and related advocacy work. Those ask directly and indirectly for the motivating drivers of engagement in the just transition's policy formulation process.

²⁴ A number of municipalities, especially those without separate EU offices in Brussels, mentioned the COVID-19 pandemic and the associated workload and necessary restructuring of responsibilities within the city administration as reasons for their lack of availability to participate in an interview.

²⁵ One interview was carried out via e-mail.

2.4.3 Qualitative Content Analysis

Qualitative content analysis is the selected method to analyze the two pillars of material at hand. It is the type of method that is most promising to allow for inferences that will lead to answering the posed research questions. Drisko/Maschi's (2015) guide on content analysis serves as the basis for its application with Mayring (2000) as the focal point for reference.

Qualitative content analysis is the most suitable method because it permits the researcher to engage both with advocacy documents and interview data simultaneously, as it goes beyond the manifest content of the data. In fact, by including latent content and taking the context in which, it was created into consideration the data as such is extended. This is particularly important when analyzing interview data, as different interviewees share their diverging perspectives on the issue. An in-depth engagement with the interview material is expected to rectify the limited amount of data. Additionally, through qualitative content analysis the researcher gets involved with both the sender of the message and content of the message itself. Interests – even if rationalistic-objectivistic ones – as the primary content of the message can certainly be expected to conceal in manifest and latent content. However, motivation for advocacy action is not necessarily hyaline from the content of the message, it can rather be derived by turning to the sender of the message. The chosen method allows to analyze motivation and reasoning for sending the messages as well.

Coding is an important process for this method, which needs to be carried out consistently throughout the material in order to identify key meanings. The first step is to immerse in the data to get a thorough overview and understanding of the texts. In the course of immersion, the data set can be cleared from text passages that are unrelated to Just Transition policies. Based on that, this study applies a combination of a deductive and inductive generation of codes. Vertical venue-shopping provides for a deductive code development. Yet, due to the variety of sources that the data set is derived from and the different perspectives they contribute, inductive coding is expected to be a complementary necessity. Therefore, preliminary code categories (themes) which are defined through the operationalization process are reviewed throughout the analysis when demerging them in further sub-codes. As coding is understood as a purely descriptive exercise, interpretation is done after the finalization of the coding and the presentation of the results therefrom (Chapter 4).

2.4.4 Operationalization

Efficient and explicit operationalization of the research interest is an important precondition for the structure of the analysis. This sub-subsection interrelates theory, material, and method and by doing so finalizes the analytical framework. For the operationalization figure 2.2 (p.20) can be read backwards. Vertical venue shopping helps to guide the researcher through the empirics.

Being the main question, *RQ(1)* serves as the umbrella for *RQ(2)* and *RQ(3)*. Its operationalization is thus less strict. In this study the choice of venue – bypassing the national level – has been already made. In the following it will not be systematically tested for any other possible venues (the national level). Nevertheless, there are three indicators that will lead through the analysis:

- (1) *Concrete access points* for municipal advocacy work on the European venue level are described in section 2.2 and thus expected to be the European Commission (and its different Directorate-Generals), the European Parliament (or MEPs) or the Council (secretariat).
- (2) Sub-section 2.3.2 elaborated that cities advocate primarily in *coalitions or through city network*.
- (3) The *type of (written) advocacy action* carried out by cities will be identified inductively in the analysis.

In contrast, to answer *RQ(2)* and *RQ(3)* interest and motivation need to be systematically operationalized. Figure 2.5 provides an overview of how indicators translate into themes (code categories) for the analysis. Municipalities’ interests on Just Transition matters are measured through their positions towards the inclusiveness of the process and positions across policy areas as deductively defined by the policy milestones. Budget and financial measures is a deductively added theme, as access to funding as proven as a strong interest of sub-national actors in the EU. (Mbaye, 2009) This way of measuring reflects the rationalistic-objectivistic nature of assumed socio-economic interests. Interests regarding inclusiveness are further coded along the themes as elaborated in section 2.1.4: a general inclusion of all geographic territories in Just Transition policies as well as the involvement of cities in the European policy formulation process. In turn, motivation is measured via two indicators. Motivation is assessed as reasons and arguments given to support a policy position or the argumentation behind the choice of venue, meaning bypassing the national level. Themes for the latter are directly derived from vertical venue shopping as developed in section 2.2: domestic contingency, an access blockage on the domestic level or an (open) conflict of policy interests. The former intends to grasp motivation that the framework cannot provide in advance and is thus a very inductive element of the methodology. One of them is expected to be the implementation of EU policies by cities. First and foremost, interests, particularly policy interests are supposed to be found in advocacy documents along with rather technical arguments of a policy position. Motivation for bypassing would be primarily located in interview material. Yet, interviews can triangulate the document data.

Figure 2.5: Operationalization.

	Indicators	Themes (code categories)
Interests	Position on inclusiveness	<ul style="list-style-type: none"> • Inclusion of all geographical territories • Involvement of cities in the policy formulation process

	Position across policy domains	<ul style="list-style-type: none"> • Re-skilling of workers • Energy poverty • Energy efficiency and renovation of buildings • Environmental awareness • Budget and financial measures
Motivations	Reasons and arguments to support the policy position	<ul style="list-style-type: none"> • Implementation of EU policies
	Argumentation behind the choice of venue	<ul style="list-style-type: none"> • Domestic contingency • Blockage • Conflict of interests

From the table it is clearly evident that $RQ(2)$ and $RQ(3)$ are operationalized separately. However, it can be expected that inferences for the research questions can be drawn across indicators and themes as well as across the two data sets. On the other hand, it is not intended to match interests with motivations. From the beginning (section 2.2) it has been clarified that the study does neither exclude nor assume a strict causality between interest, motivation and advocacy action. To illustrate with a hypothetical case: a city's interest could be to have a) stricter EU regulations on energy efficiency goals of public buildings or b) looser EU regulations on energy efficiency goals of public buildings. The motivation in either cases could be the same; for instance, that municipalities' leeway is too restricted to renovate their buildings in the best possible way. For both interests a letter to the responsible DG at the Commission could be the advocacy activity they carry out. Therefore, both interest and motivation can be estimated in the same material without facing the menace of endogeneity.

This extensive chapter designed the analytical framework. Having set the scene of the Just Transition policy procedures within the EU's MLG structure in which municipalities as interest-maximisers advocate towards European institutions, vertical venue-shopping was introduced as the theoretical tool to guide through the research. With the data selection and generation process being finalized, the next chapter applies a qualitative content analysis to it.

3 Analysis

The method of qualitative content analysis demands a highly structured analytical procedure. This chapter establishes the final coding scheme and features the notable highlights from the data. This is roughly structured along the variables, hence advocacy action, interests and motivation. Observations and results outside this plot are also included. Since the applied method is a primarily descriptive one, each

section follows a two-steps approach: First the results are described, then they are analyzed in the context of the thesis' research interest. A further discussion of the empirical results and conclusions for the analytical framework follows in chapter 4.

Coding Scheme

The coding scheme underwent several reviews. The final version is summarized in annex 4. Due to the inductive and deductive code generation several pre-identified themes and categories were dismissed as 'non-significant' or pooled in broader categories. This regards mainly cities' position across policy domains and can be traced back to the data selection process. As the choice of material oriented itself along the deliberately identified policy milestones, policy domains are not covered equally. When reading the material this is a necessary, yet important limitation to be aware of. Further, the material presents a great diversity of perspectives; ergo, interests and motivations are diverse as well. Advocacy is a practice prone to the usage of framing techniques, which imposed certain difficulties on the coherent categorization of inductive codes. However, deductive themes are supplemented by several inductive ones. Interest and motivation could not be consistently linked to each other throughout the material. For some cases differentiation of interest and motivation is particularly challenging as cities do not consistently support their policy positions with argumentation. In the same document one code could serve as interest and motivation in different sections of the text, which makes context highly decisive. Since the study's analytical framework does not imply causality, this is a minor obstacle for the analysis.

Non-quantified matrices visualize the results of the analysis for *RQ(2)* and *RQ(3)*. They provide a brief explanation of each category and rank their frequency from high to low. Matrices are supported by narrative elements²⁶ to highlight the most important findings. The level of interpretation in the analysis is remarkably low and intends to be restricted to clarifications of latent content or the context of the message. Results from the two pillars of material are jointly presented. However, differences are clearly pinpointed. Self-evidently when analyzing the data close attention is paid to its trustworthiness. When investigating interests and motivations of advocacy actions this applies especially to the interview material which needs to be evaluated against the backdrop of the interviewees' individual perspective ('who do you talk to'). It is recognized that the similar scrutiny pertains for written advocacy work. Yet the aim is not to depict results for individuals or groups of actors, as this is not subject of investigation.

3.1 Advocacy Actions

This section analyses the 'advocacy actions' as the main research question *RQ(1)* is interested in. In line with its operationalization both deductive and inductive results are found. It is possible to abstract results for the first two indicators directly

²⁶ The source of direct quotes is indicated by the document number as listed in appendix 1.

from the data set of written advocacy work (appendix 1), without engaging in further qualitative content analysis. However, interview data offers additional insights which need to be analyzed.

The sample of written advocacy work presents different types of documents in degressive frequency: policy and position papers, (open) letters, declarations. The addressees of these communications are all three European institutions. When there is no specific target group mentioned, the document in most cases addresses the general public. Authors of those documents are overwhelmingly city networks or coalitions of city networks. For fewer documents it is individual cities that sign the advocacy document.

Contrary to expectations, the analyzed data imposes a certain distinction between the EU institutions as addressees. All interviewees mentioned the CoR as an important and supportive ally in Brussels, which they regularly and intensively collaborate with. For instance, the letter, initiated by the V4 capitals [Doc. 32], was officially launched at the Committee of the Regions. Such assurance is based on the circumstances that all interviewed cities have either their mayors or members of the city council represented in the CoR and thus direct and unimpeded access. One initiator of the mentioned letter clarified that communicating their interest to other EU institutions was facilitated through their tight relationship with the CoR. It thus functions as an enabler of rather informal engagements and communication channels.

This study concentrates on the intentional bypassing behavior of cities. Nevertheless, interviews with city advocates produced interesting results for the alternative path of action. Certainly, cities regularly cooperate with national governments to influence European policy-making.

“We are in touch with the colleagues from the Czech Permanent Representation on different subjects. Mostly we’re meeting in order to discuss the latest developments in cohesion policy etc.” (City Interviewee 3, 2020)

This is confirmed by the interview with a city network. (Network Interviewee 1, 2020) The interviewee explains that the advocacy strategy – choice of access point – depends on the legislation they intend to influence. In some cases, it is necessary to engage with the Council. Generally, and due to its organizational structure, it is rather difficult to approach the Council as an institution, therefore they try to talk to the member states instead.

“So, usually when we want to approach [the Member States], we go through our members. So, if we want to approach France, we usually go through a bilateral meeting with the French PemRep and a French city.” (Network Interviewee 1, 2020)

3.2 Interests

The following section analyses ‘interests’ as *RQ(2) Which concrete interests do they promote?* asks about. In order of the operationalization scheme it firstly

presents results for advocacy positions on inclusiveness and subsequently for positions across different Just Transition policy domains. As expected and intended results are mostly found in the first pillar of written material.

Before involving with the results of this section, an initial observation on the definition and understanding of Just Transition among cities needs to be shared as this impacts the interpretation. All interviewees received the question ‘What does the catchphrase Just Transition mean to you?’. Their answers differ widely. While some see it as the sole coal-phase out and linked it to the re-skilling of workers:

“The term itself is pretty fresh, which came with the Green Deal. [...] So, it’s temporary and relatively little scale funding [...] for re-training of the labor force.” (City Interviewee 2, 2020)

Others take a more ideological stance that includes all branches of society, especially vulnerable groups:

“So, just transition does not mean exclusively to help regions stuck in strong fossil fuel related economic sectors, just transition means that there is no sustainable transition for a small part of the society.” (City Interviewee 1, 2020)

What they share however, is that they intuitively referred to the understanding of Just Transition as presented by the European Commission’s proposal on the JTM. Because of that two out of four city representatives’ first reaction was rather reserved, as cities do not host any coal mining and would thus not be affected by measures under the JTM. Only in a second step and in respond to follow-up questions they agreed to the wider definition of Just Transition as the fair transformation towards a low-carbon economy and found cities as highly relevant actors of such a process. Similar observations account for the written advocacy work. They rarely define their understanding of Just Transition or challenge the one of the Commission’s proposals. Notably Eurocities and the Covenant of Mayors stress the multi-dimensional character of the energy transformation and describe the just elements thereof as a core interest they pursue.

Figure 3.1: Results for Position on Inclusiveness.

Category	Explanation	Frequency
Involvement in the policy formulation process	They demand (better) consultation and structural involvement of cities in the initial steps of the policy formulation process on EU level, e.g. EU – mayors dialogue, and by national governments, e.g. in the drafting of Territorial Just Transition Plans.	high
Involvement in the implementation design	In respect of the partnership principle, they demand effective and steady involvement in the drafting process for further implementation of the EU policy, i.e. the programming process in cohesion policy.	high

Independent implementation	Cities believe they should receive more independence and leeway in their implementation of transition policies, e.g. through higher flexibility of financial tools.	medium
Exchange	They appreciate peer-to-peer exchange on the policy issue and cooperation across territories and borders.	low
Inclusiveness of JT	They position themselves on the importance of JT as such and its inclusive design, e.g. through citizen participation.	low

To some extent these conceptions are reflected in the results for the indicator ‘Position on Inclusiveness’ as summarized in figure 3.1. Since inclusiveness of the Just Transition (policy) process proves to be of high overall interests for cities, they demand involvement in the entire policy cycle, from formulation to implementation. The term can be read from the initial drafting of the policy on the EU level, to the country specific design of the policy implementation, for instance in Territorial Just Transition Plans, and the on-the-ground realization by municipalities. A more structured and institutionalized relationship between the EU institutions and municipalities is a prevailing demand.

“Include the Covenant of Mayors as a partner to Member States and EU institutions for designing energy policies from the bottom-up.” [Doc. 13]

The thorough and effective application of the partnership principle within cohesion policy, but with the same logic applied to other policy domains, is notably often identified.

“CCRN calls for an effective application of the partnership principle to allow sub-national authorities, including capital cities and regions to play a fully-fledged role in the preparation, implementation, monitoring and evaluation of programmes.” [Doc. 3]

Reoccurring is further the notion of the principle of subsidiary as a binding doctrine for all EU legislation. The context refers to involving the level that actually implements the policy in the formulation process.

“Measures should be well-coordinated and taken at the most appropriate level of government.” [Doc. 16]

The material less frequently mentions best practice sharing and cooperation between different municipalities as an interest. Also, active stakeholder involvement – besides cities themselves – in the transformation process is of low frequency. A possible reason for that might be the fact that most documents target a specific piece of legislation and thus apply a rather technical tone. Yet, in interviews it became apparent that ‘having people on board’ is a crucial pre-condition for a fair shift to a low-carbon society. (see Network Interviewee 1, 2020)

Territorial inclusiveness (see figure 2.5) was dismissed as a theme, as it turned out to be rather brought forward as a latent line of argumentation for policy positions than a point of interest. However, it is a highly significant code in itself throughout the material. The inclusion of municipalities from all geographical regions in Just Transition policy formulation becomes apparent as the underlying aim of the examined advocacy activity.

Figure 3.2 displays results for the indicator ‘Position across Policy Areas’. Sub-codes for this indicator are overall of lower total frequency. However, all sources share a very high interest in budgetary questions, even though their actual positions diverge. To a considerable extent cities do actively share their positions on the issue of energy efficiency and climate goals, while social aspects of the transformation, meaning energy poverty or implications for the labor market are less frequently mentioned. This observation might be attributed to the stipulation of policy milestones.

Figure 3.2: Results for Position across Policy Areas.

Category	Explanation	Frequency
Budget and financial measures	This concerns the total volume of the transition budget as well as its relation to the cohesion policy budget. Positions regard the MFF, small scale projects and direct funding.	high
Energy efficiency and renovation of buildings	Cities demand binding and efficient targets and are interested in the renovation of buildings.	medium
Climate goals	They consider climate goals as a policy priority and thus demand e.g. no further fossil fuel subsidies.	medium
Social aspects	They defend social aspects of the transition as an underlying interest, playing out e.g. in the (re-) skilling of workers.	low
Other	Municipalities are interested in city specific issues, such as the electrification of public transport.	low

The by far highest code frequency is assigned to the monetary positioning of Just Transition, which again features questions about territorial inclusiveness. The prevailing consensus is that climate and transition goals and aspirations require adequate financial resources.

“Well, because you know the thing is, this measures to implement I mean it’s a challenge, but it’s of course also quite costly.” (City Interviewee 3, 2020)

Taking into account the importance of the MFF and the share assigned to cohesion policy, municipalities hold strong positions on its core idea of the balancing of

territorial inequalities in Europe. A common position is that Just Transition funds must complement existing cohesion money and not be derived from it. They further argue that beneficiaries should not exclusively be regions (as legal entities), but cities need to be eligible for financial support as well.

“The Green Deal must be backed by financial resources that support all cities and people in achieving a fair and inclusive transition.” [Doc. 17]

The material diverges on the territorial distribution of financial measures. The majority would join CEMR’s recommendation of including all geographical areas of Europe:

“CEMR recommends not overlooking territories that have already started their transition, often at considerable cost. These territories should also be supported by the JTF.” [Doc. 4]

However, a minority of mayors [Doc. 24] who represent municipalities in traditional coal regions, would rather contend to concentrate the (very) limited financial resources on the support of those territories strongest hit by the structural change. What further stands out, is the V4 capital cities’ call for direct access to EU funding, and which has been joined by around 40 additional cities.

“[W]e urge the European Institutions to recognize cities’ and urban areas’ pivotal role in implementing strategic green policy objectives and to allocate directly accessible, city-tailored EU funds to secure those outcomes.” [Doc. 32]

This coding is confirmed by interviews with some signatories. Next, climate targets are a frequently identified policy position which go along with the improvement of energy efficiency in various aspects. Those refer to the level of ambition of climate and emission reduction goals which cities are committed to or which have been set at higher levels, but also often stress their binding character for all levels of the governance system. Thus, cities advocate for compliance monitoring of member states and the abolition of fossil fuel subsidies. Municipalities do rather seldomly mention concrete policy positions on the social aspects of the transformation process, such as energy poverty or the re-skilling of workers. Despite not explaining further details of the position, the social dimension is identified as an interest present in the background of written advocacy work.

“Investment must also be carried out in a way that fairly addresses the social impacts of climate action, ensuring no one is left behind and the benefits are redistributed, alongside the costs.” [Doc. 23]

It is more directly expressed by the interviewees. For instance:

“The just transition should enable Europe to completely eradicate energy poverty.” (Network Interviewee 1, 2020)

In sum, inclusiveness in its various dimensions and the financial measures to enable Just Transition are the strongest results of the interest analysis. The most striking finding is the overall picture which highlights the importance of inclusiveness over the access to and volume of the transition budget. For this particular outcome to not mislead further discussion, it is important to consider what Network Interviewee 1 clarifies:

“We try to make [involvement] more structural; we are always calling for more structural processes between cities and EU institutions to make sure that the voices of cities are well represented, but there is large room for improvement, a huge one.” (Network Interviewee 1, 2020)

The involvement of cities in policy formulation and making structures of the EU (and on national level) is the core aim of municipalities’ advocacy efforts across all policy domains, ergo it is not exclusive to Just Transition matters. It relativizes the result. Another general result from the latent content of the material, is the subliminal mainstreaming of climate and transition targets across policy areas that is reflected across the interactions of policy positions. Altogether,

“[...] deeply transformative policies for Europe must be matched by radical new ways of working between policy sectors, levels of government, and with citizens to achieve the necessary impact.” [Doc. 17]

3.3 Motivation

This section deals with results for the two indicators of motivation behind municipal advocacy activity, and tackles *RQ(3) What motivates them to advocate their interests directly towards the EU institutions?* In general, throughout the data set and regarding both indicators, the reasoning and line of argumentation for a policy position (interest) tends to be illustrated by examples of best-practices on the ground or experiences cities have gained from practices within the EU multilevel governance structure.

Through the analysis of the motivation behind policy positions it becomes apparent that cities do not consistently prove their interests with argumentation. Instead, often they rather present a list of demands to the targeted point of advocacy. Figure 3.3 displays the results. The fact that the municipal level implements the majority of EU policy, hence transition measures as well, serves as the prime justification of cities’ advocacy and policy positions. This is followed by the achievement of climate targets and the will to realize a fair transformation.

Figure 3.3: Results for Reasons and Arguments to Support the Position.

Category	Explanation	Frequency
Legitimacy	As implementors of EU policy, they are the closest level to citizens, which makes them inevitable for the performance of JT.	high
Implementation of EU policies	Cities argue that EU policies need to be adaptable to the diversity of the municipal reality as they have direct effect. Cities are ready to function as test beds for climate solutions.	high
Objectives	They are highly motivated to meet the EU climate targets, fulfill their own commitments, and accelerate the transition process.	medium
Transition impact	Cities aspire to real justice in the transformation, which requires a radical change, because it affects every layer.	medium

Cities' core strand of argument rests on their (self-proclaimed) legitimacy to play an active role in the formulation and implementation of transition policies. Legitimacy evolves first and foremost from their proximity to citizens on the ground. They gladly bring up the fact that the EU depends on the municipal level as the implementer and enabler of the shift, both from a technical (e.g. being large emitters) and social perspective.

“Democratically elected, closest to the citizens and trusted most across administrative levels, [cities] are well-positioned to localise the energy transition (i.e. implement it on the ground), delivering clean energy, providing hundreds of thousands of jobs and encouraging public participation.“ [Doc 33]

From that position they argue, they deserve a seat at the table since policies need to match a diversity of local realities and scale-up the transition. Besides those implementation-related arguments, municipalities justify demands with a certain ambition to meet the EU's climate targets as well as their own commitments as front-runners of the transformation process. Several documents make additional cross-references to Europe's pledge to the SDGs and the Paris Agreement. Lastly, the material highlights the transition's impact on all regions of Europe. On that point they often refer to the misleading prominence of regions rather than urban areas in discussions. The category reflects cities' underlying understanding of the urgency and inevitability of a Just Transition. Both in advocacy documents and throughout the interviews their declared goal is to improve the quality of life of citizens, either as a political rational:

“Because at the end of the day what matters most for us is, and for the political leadership, what matters most is what the citizens can see with their very eyes on the ground, what you basically do for them.” (City Interviewee 3, 2020)

Or economically motivated:

“We intend to use this transition to provide our citizens with a better quality of life, stimulate local economic development, attract investment and create green jobs.” [Doc. 14]

Notably, one interviewee highlighted the city’s sincerity about Just Transition:

“After almost a decade of economic crisis in Greece, “nobody should be left behind” is not just another catchy slogan but a real social necessity for the entire population.“ (City Interviewee 4, 2020)

Such emphasis is perceptible throughout the document as well as interview material and partially reflected in municipalities’ motivation to bypass the national level, too.

The second indicator refers to cities’ motives of venue choice – bypassing the national level and instead addressing the EU institutions with their advocacy. Contrary to anticipations, written material entails a significant number of sub-codes to measure reasons for the choice of venue. Nevertheless, as expected, the interview data provides a much more targeted and deeper insight and a larger variety of codes. Results are presented in figure 3.4. Political access point blockage at the national level is coded at the same high frequency level as conflicting interests between the municipal and national level. Domestic contingency occurs with a lower frequency which is possibly related to the individual political and polity-related situations in member states.

Figure 3.4: Results for Reasons for Venue Choice.

Category	Explanation	Frequency
Blockage	Cities criticize their non-involvement in top-down policy processes by national governments.	high
Conflict of interest	There is a mismatch of policy priorities between national and municipal levels, which is often connected to political opposition.	high
Domestic contingency	Domestic political specificities can enable or constrain bypassing.	medium
Other	Venue choice is largely dependent on political will.	low

The blockage category refers to national level venues which deny access for cities, by not considering municipal interests on the relevant policy issues. Obviously, there is a certain overlap with or strong reference to interests of involvement at different stages of the policy process as analyzed above. In combination with the fact that blockage is a re-occurring phenomenon across member states, this can

serve as a possible explanation for the high frequency of this code category. Advocates complain about the non-involvement in decisions on the allocation of EU funds, thus the missing link between them as beneficiaries and the managing national authorities. Further, cities are excluded from the drafting of National Energy and Climate Plans (NECPs).

“But despite the obligation in the Governance of the Energy Union regulation, local efforts are often overlooked when member states develop NECPs.” [Doc. 17]

Conflict of interest is coded with high frequency as well. Such conflict often refers to climate and emission reduction targets on which cities are usually more ambitious than national governments which is reflected in transition policies. A mismatch of policy priorities is a repeatedly identified sub-code, which probably derives from the nature of dynamics between central governments and sub-national entities which apply different perspectives on an issue scope: The national governments need to grasp the diverse situations and dimensions across the country, while the municipal level reasonably concentrates on local needs.

“Because the national governments are representing [the interests of] their [entire] territories, but the real problems, the climate issues themselves are felt in the cities, where the economies, where the people are. And if we are to be serious about the transition in the big term, then of course the most relevant party should be the major cities.” (City Interviewee 2, 2020)

Even though, this is a recognized condition among municipal advocates, it nevertheless prompts their own policy positions. A mismatch can go as far as cities feeling (or in fact being) penalized for – in their opinion – inappropriate decisions taken by the national level.

“As regards [European rules to comply with], we request assurances that local and regional authorities will not be penalised by decisions taken by the EU national governments.” [Doc. 6]

Another very frequently found sub-code is political opposition of the mayor’s office and the national leadership. Regarding the advocacy attempt to receive funding directly from the EU institutions [Doc. 32], one signatory explains:

"[S]o, the cities are asking for direct funding for the environmental and climate projects in their respective cities. This is the driver or the master idea of the letter, to receive direct funding from the European Union, so the money would not have to be channeled through the national governments, which are at least in the case of Budapest and Warsaw very in odds with political leadership of their own capitals." (City Interviewee 3, 2020)

Political opposition can accelerate to a stage on which cities in opposition are discriminated against by national governments and face severe cuts in funding, including EU (cohesion) funds which are managed higher up in the domestic polity

hierarchy. This is confirmed by a second at that time not directly affected signatory who elaborates:

“They are in heavy opposition with their national governments, they face a similar situation which we had some years ago. But in addition to it, now there is a much wider political division. [...] Of course, national [governments are] discriminating the cities. And we remember ourselves, by our own experience, if the national level is political heavily opposing the capital it also faces discrimination in funding.” (City Interviewee 2, 2020)

In this context, the sub-codes ‘political opposition’ and the category ‘budget and financial measures’ for policy position reinforce each other through high frequency. Additionally, domestic contingency is an intermediately influential category which either favor or constrain municipal bypassing behavior. Interviewees clarified that member state specific structures and constellations influence their advocacy work. For instance, in some member states municipalities are represented towards both the national and European level by unions or associations; or are in good political relationship to their national leaders. These sub-codes discourage them from bypassing the national level in an aggressive manner. In turn, good party and party group affiliation – a well working network – in the European sphere functions as enablers of bypassing actions. Further, a high (domestic) bureaucratic burden encourages cities to establish their own independent channels to gain an overview of and voice in EU politics. Lastly, the political will of advocates in general and on transition issues in particular is to be mentioned as a significant sub-code. While some cities representatives understand their role as an observer who redistributes information about EU politics and vice-versa, other cities have a strong objective to influence European policies.

“[The mayor] also decided to strengthen the access of the representation of the city in Brussels, with exactly the goal [to] not only [...] follow what’s going on, but also to participate in the decision making with active lobbying, within organizing networks, with joint efforts with other cities to influence European decision making.” (City Interviewee 1, 2020)

The same interviewee, who was a Member of Parliament and MEP himself before he became the head of the city representation in Brussels, witnesses the untapped potential of municipal influence on EU decision-makers, and encourages his colleagues to be more active.

“We cannot expect that we don’t have to do things as the municipality because the national government does the representation of our interests in the Council because it is not happening. The government is doing something which is quite the opposite of our interest and what we really need.” (City Interviewee 1, 2020)

In those cases, cities are motivated to be proactive advocates themselves and find their natural ally in the EU institutions instead of their national governments.

To conclude, cities present very reasonable, technical arguments to support their positions on policies regarding the transformation towards a low-carbon

economy. The same accounts for arguments in support of a call for an inclusive relationship in the multilevel governance structure. Motivation for a bypassing of the national level is clearly identified. In all five interviews it became apparent, that what matters for municipalities' advocacy is not necessarily the actual interest that they promote, but the motivation behind their activity. The analysis conveys the general impression of municipalities which resemble confident advocates as they are convinced that:

“The fight against climate change will be won or lost in cities.” [Doc. 32]

3.4 Further Findings

The following section gives an overview of further findings of the analysis which do not directly contribute to answering the research questions or have been operationalized beforehand but are nonetheless a noteworthy contribution to the research interest of this thesis.

The tense of *RQ(1)* implies the possibility for a change over time in municipal advocacy activity, which however finds no significant evidence in the data set. There has been no systematic tracing of interests and motivation over time, but the analysis provides an overall impression for the determined time period. As the topicality of climate and transition issues gained significant prominence on the political agenda over the last years, so did cities attention and involvement in the topic increase in Brussels. Conspicuously along with the European Commission's (new) priorities and the proposal of the European Green Deal, Brussels based city networks raise matters of societal change more strongly and become less technical in their argumentation. Again, this depends on the material selection. In most recent communications they mention the intergenerational argument of the transformation process as well.

“We owe it to the next generation to make more ambitious commitments to address climate change at all levels of government and in every aspect of European policy-making.” [Doc. 22]

Further, questions about legitimacy are a re-occurring topic. Cities make use of it in a two-fold manner. As analyzed above, on the one hand, they defend their own attempts to influence EU policies as legitimate, because they are directly and democratically elected. On the other hand, they are convinced to improve the EU's own degree of legitimacy. When asked about the accessibility of EU institutions, one interviewee answered:

“If you compare [us] with other associations in Brussels, lobbying the institutions in Brussels, I would say that we don't have that many difficulties, because cities are a pool of citizens and so far the EU institutions are well aware that there is a huge gap between the EU and citizens. So, they consider cities being the right intermediate to work with when it comes to citizen engagement.” (Network Interviewee 1, 2020)

Lastly, the interview material provides an insight into the East-West divide in Europe on Just Transition matters. One Eastern European interviewee provided background to the city's understanding of Just Transition by stressing the danger of a negative feedback loop in case the shift towards a net-zero economy does not get the Eastern part of the Union on board. Since those territories are in an earlier stage of the energy transformation, they are at risk of being unable to keep pace with the process. He argues that this would lead to higher energy costs for individual households and a less competitive Eastern European economy, thus deepening the existing socio-economic gap in the EU. These observations are confirmed by the interview with the city network representative.

The analysis' results are summarized and discussed in the following chapter.

4 Discussion

Chapter four provides a structured overview of the results of the analysis. It matches outcomes with research questions to discuss them within the study's broader research interest. From that point it presents opportunities for further research on the issue.

4.1 Main Findings and Remaining Question Marks

This section provides clear answers to each research question by firstly summarizing the analysis' respective results. Secondly, it puts those results in relation to the vertical venue-shopping framework to discuss its performance and contribution for each question. Lastly, potential remains from the analysis which could not be explained with the theoretical approach are exposed for further investigation.

The main results of the analysis are manifold and to a high degree explicit, even though the three variables and their four indicators are highly intertwined throughout the material. The understanding of the term Just Transition differs among city advocates. While some comprehend it as the process of the coal-phase out, which would not be of bigger concern for cities since they do not host any coal mines on their territories, others grasp the wider concept of a gradual shift towards a low-carbon economy which brings along the necessity of societal change. The latter corresponds to the definition this study shares. Recently, the affiliation to a Just Transition understanding defined by the Commission's JTM proposal became strong.

RQ(1) In what way do municipalities proactively engage in EU policy formulation processes?

The analysis provides clear answers on who municipalities target as well as through which means. Written material addresses all three European institutions as well as the wider public, depending on the policy issue at hand. This is done through position papers, letters, and declarations as confirmed in interviews and (exclusively) in coalitions or through city networks. It needs to be noted that all written work represents a city's official position, while (true) motivation is often primarily communicated through bi-lateral and informal channels to respective access points.

RQ(1) was rather superficially operationalized, as it is to a certain extent restricted by the analytical framework and material. The study's prime interest focuses on bypassing behavior of cities which circumvent their national levels and directly interact with EU institutions. The framework thus limits '*In what way*' to activity on the European level and in advance excludes the national level's venues. Results for *RQ(1)* challenge this preoccupation. Cities have many different 'ways' to execute advocacy at their disposal.²⁷ The in the data set entailed written advocacy documents are significantly often directed towards the EU institutions and national governments at the same time. Hence, cities indeed advocate their positions on European Just Transition related legislation towards the national level to a non-dismissible degree. The Council is preferably approached through the member states' permanent representations in Brussels, which they collaborate with. Whether member states and cities align their policy positions and intend to collectively increase their pressure on a Commission proposal or if cities seek to influence the member states voting behavior in the Council on the final legislation remain as open questions.

Related observations pinpoint the overlap of levels of venues as another inference for vertical venue-shopping in the EU. Contrary to prior expectations interview results depict the Committee of the Regions as a highly supportive institutions for city advocacy which they very frequently collaborate with. Both the Council (national and European elements) and the CoR (municipal/regional and European elements) are hybrid institutions that impose certain challenges to vertical venue-shopping as used in this study. Venues appear thus as too complex to solely structure them along MLG. Therefore, the interaction of venues and a clear definition would deserve closer attention. In that sense, the results support what studies by Eisinger (2007) and Greenwood (2011) suggest, that bypassing the national government on one issue does not exclude cooperation on another.

RQ(2) Which concrete interests do they promote?

Results of the analysis give precise answers to *RQ(2)*. The main finding is that inclusiveness is a stronger articulated interest than access to funding of Just Transition measures. This means in detail: Concrete interests which city advocates express through written documents towards the EU institutions do mainly consider the inclusive character of the policy formulation process of EU legislation and the

²⁷ Examples from the analysis: access EP through the city government's party group, having a city's politician as member of CoR, exercise pressure through a European city network, national municipal unions or in loose alliances.

subsequent implementation steps at all levels. The most prevalently re-occurring sub-code is the effective application of the partnership principle across policy domains. The partnership principle can be considered as one feature of the rules-bound context which would institutionalize the venues cities should access. Since this provision does not find consistent realization on the national level, municipal actors turn to a different, European level access point. These non-compliances have been a re-occurring dispute in evaluations of (the effectiveness of) cohesion policy since member states tend to treat municipalities as just another beneficiary. (see e.g. Hamza, et al., 2014) Against this backdrop, results of the analysis must be viewed in light of the solidity that cities do principally advocate for a better inclusion of municipal interest in policy formulation and policy making across all policy areas and issues. As a follow-up question, further investigation of how cities confront their national governments and authorities with their shortcomings and in turn how those defend their prohibitive practices are expected to allow for further conclusions for vertical venue-shopping as a concept as well as for in how far it impacts bypassing routines.

In total, inclusiveness has been coded as a stronger category than any position across policy domains. Nevertheless, when looking across policy positions, ‘budgetary and financial measures’ are by far of highest concern to municipalities. This regards the total (EU) budget for the transition as well as the share cities would have access to. Direct access to EU funding is a rather unique demand that cities would publicly communicate towards the institutions. As to be expected, concrete demands differ among issuers, especially among municipalities in coal regions and larger urban areas. However, the general notion indicates a sort of competition between traditional cohesion policy areas and funding and Just Transition measures. Further, climate targets and cities’ own commitments are of certain interests. This is also reflected in a subliminal call for climate mainstreaming in all EU policies. Social aspects such as energy poverty are less frequently coded. Hence, in the context of this study, cities largely behaved as rational actors who are driven by socio-economic and socio-ecological interests.

RQ(3) What motivates them to advocate their interests directly towards the EU institutions?

Answers to *RQ(3)* are less straightforward, and more diverse than to the two previous questions. Results of the analysis of cities motivation to advocate inductively display different aspects of legitimacy as an important line of reasoning for policy positions. The argument strongly relates to cities’ urge to match EU policies with local realities, to improve their citizens’ quality of life as their democratically elected representatives. Legitimacy further links to a main critique vertical venue-shopping as a concept and bypassing process might face. Member states – rather than their individual and subordinated levels – are first and foremost the sovereign representatives of their territories. Those two opposing perspectives are reflected in what is raised in section 2.1.4. Cities consider the procedural justice of a Just Transition, while opponents of bypassing detect a total lack of such legitimacy.

Strongest motivational factors for municipalities’ choice of venue are the denial of access to national venues through non-involvement in policy process as

well as (strongly) conflicting policy interests or political positions. The former particularly interrelates with interests on involvement as elaborated above. It is thus a clear sign of how technical and process related interests and motivational aspects reinforce each other and trigger bypassing in the Just Transition domain. The latter highlights the relevance of (political) opposition for proactive advocacy towards the EU as proposed by the vertical venue-shopping framework. Generally, municipalities seek to avoid being panelized for misbehavior of their national governments. This is not necessarily limited to the Just Transition policies, however surely substantiated by more ambitious municipal climate targets. Most interestingly, results propose that cities in strong political opposition are (financially) discriminated against by central governments and thus reach out to the EU to find support. This observation deserves a systematic study of the influence that the level of political opposition has on the intensity of a municipality's proactive advocacy and representation in Brussels. The analysis proposes that advocacy activity on the European level depends on a city's political will, which leaves large room for (individual) municipalities to be more active. Results for domestic contingency reflect a high diversity of opportunities and constraints that municipalities face in their respective domestic governance structures. It is thus difficult to draw more general conclusion or paint a coherent picture. Factors of this category can both enable bypassing or constrain it as national venues satisfy cities' endeavors. To disentangle those domestic particularities and examine their impact on bypassing behavior a more detailed mapping of individual cases and their rules-bound context would be necessary.

In sum, the analysis concludes, that socio-economic interests stand behind the actual advocacy action and hence affirms Guiraudon's vision of the framework as a guide to the motives behind bypassing rather than concrete explanations. From a municipal perspective inclusiveness of the policy formulation process in all its dimensions is key to a truly Just Transition.

4.2 Shortcomings and Further Research

There are three observations and side-findings from the analysis which pave the way to further research within the field of Europe's Just Transition and are shortly elaborated on in this final section.

Firstly, the study's analytical framework imposed certain restraints on the generalizability of its results. The material selection was suitable for the objectives and scope of the thesis, yet it can be charged for a number of limitations, which became apparent in the course of the analysis. Further research could increase the number of policy milestones to a wider range of policy areas as defined in subsection 2.1.1 and thus extend the data set of written material to counteract a concentration of interests (such as on energy efficiency). Additionally, a higher number of interviews with people in different functions at a municipal administration or city network would paint a more comprehensive picture.

Secondly, this restraint pertains in particular for data from regions of Central-Eastern Europe. Results from the interviews rise the socio-economic gap

between Eastern and Western parts of Europe as a highly salient issue for Just Transition. Decision taken now are expected to have far-reaching implications on cohesion between member states. Hence, the importance of the in sub-section 1.1.1 elaborated scientific gap is confirmed. However, the thesis leaves the task to place stronger focus on Eastern European cities to further research.

Thirdly, this study deliberately focused on the proactive, bottom-up advocacy of municipalities towards EU institutions. Nevertheless, the analytical framework and by-products from the analysis allow to look at another movement within the EU which challenges its rules-bound context: Activism by the EU institutions can be considered as inherent to the downwards stream of MLG. Indeed, the European Commission itself facilitates informal, parallel structures which over time sometimes become formalized or rather more independent from the formal polity structure. For instance, in 2008 the Commission initiated the European Covenant of Mayors, as a platform to combine efforts to advocate towards the EU and municipalities to commit themselves to emission goals. Since the Commission was unable to enforce national emission reduction targets it was a strategic approach to involve the local level in the policy process. (Kemmerzell, 2017, p. 5) As apparent from this study's analysis, by now the Covenant of Mayors became a rather independent network of cities and towns that advocates towards policy makers. More recently the Commission further launched the 'Coal Regions in Transition Platform' as an open forum for dialogue between stakeholders and policy makers. Those actions of activism lead to the impression that the European Commission itself practices vertical venue-shopping, in a downwards stream addressing the local level, rather than member states. Bouza Garzía (2015, p. 557) claims that participatory initiatives like those have been introduced as a means to compensate for the lack of democracy in the EU. Taking into account the thesis' results on questions about legitimacy, European institutions as practitioners of vertical venue-shopping constitute a research interest worth further consideration.

5 Conclusion

This thesis covered the highly complex topic of Just Transition, which is located at the nexus of climate change and energy policies, and has a deep economic and social impact. Its research interests trod into a gap that scientific literature and Europe's political agenda have vilipend.

This thesis wanted to examine municipalities' efforts to influence the EU's policy formulation process on Just Transition.

This interest was tackled through three research questions which asked about *why* cities (RQ(3)) promote *what* interests (RQ(2)) and *how* they do that (RQ(1)). The study approached them through a systematic analytical framework. It initially defined its understanding of Just Transition and placed municipalities in the EU's

multilevel governance system. In those surroundings, cities were perceived as interest-maximizing advocates. Vertical venue-shopping was detailed as the theoretical framework to guide through the empirics. The study's material consisted of written advocacy documents of European cities and city networks which were complemented by interviews with municipal advocates. A qualitative content analysis identified the inclusiveness of the process as a stronger interest than financial measures for a Just Transition. For municipalities a conflict of interest and political access point denial are the most substantial incentives to bypass the national level and advocate towards EU institutions. The analysis' results were discussed in the last chapter which clearly answered all research questions and indicated opportunities for further research.

In sum, the thesis' objectives are met. The study's deliberate intention was to be one piece of the puzzle which illustrates the role of municipalities in Europe's Just Transition. The discussion confirmed the futility to take all influential aspects on municipalities' advocacy behavior into consideration as the innate feature of this research project. However, the thesis helped to explore and understand the different dimensions of Just Transition and has thus managed to give more structure to its current debate in the EU.

Nevertheless, recent developments and consequences of the COVID-19 pandemic have twisted the content and directions of discussion on the European Green Deal and its Just Transition measures. The prevailing questions in Brussels and member states are: Will climate emergency and economic recovery compete? Or will Europe seize this unique opportunity for a re-start towards a green future? European scientific think tanks have already issued several pieces on the matter and propose feasible solutions for a green path out of the crisis. (see (Elkerbout, et al., 2020; Jacobs & Palmer, 2020; Anderson, et al., 2020) Yet, the decision will be determined on different levels.

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Appendix 1 List of Advocacy Documents

N°	Author/ Signatory	Title	Type of Document	Addressee	Date of Publication
1	CCRN	For a strong Cohesion policy post-2020 supporting EU capital cities and region and their citizens	Position Paper	COM	06/2017
2	CCRN		Letter	COM	30/11/2017
3	CCRN		Letter	COM	22/02/2019
4	CEMR	CEMR Analysis – The Just Transition Mechanism	Policy Analysis	COM, MEPs	14/01/2020
5	CEMR	CEMR calls for a strong MFF and a cohesion policy that actively involves local and regional governments	Resolution		06/11/2019
6	CEMR	Declaration on the Commission proposal for the Multi-Annual Financial Framework (MFF) on regional development and cohesion	Declaration	COM, MS	11/06/2018
7	Climate Alliance	Climate Alliance response to the consultation on the Energy Efficiency Directive	Position Paper		30/01/2016
8	Climate Alliance	Climate alliance members boosting local climate solutions for global challenges	Declaration	COM	02/10/2018
9	Climate Alliance	The Future we Want	Recommendations	EU, MS Governments	09/2017
10	Climate Alliance	Climate Alliance response to the consultation on the EPBD	Position Paper	EU, MS Governments	21/10/2015

11	Covenant of Mayors	Open letter to European Energy Ministers to revise the Energy Union Governance Regulation incorporating the needs of local and regional governments	Open Letter	Council, Ministers for Energy	11/06/2018
12	Covenant of Mayors	EU Climate Long-term Strategy 2050 Contribution from the European Covenant of Mayors Board		COM	10/10/2018
13	Energy Cities	How a shared energy transition can transform Europe's energy landscape and tackle the root causes of strife in Europe today	Manifesto		02/2019
14	Eurocities	A localised Energy Union of smart cities – for jobs, prosperity and sustainability	Statement		05/2015
15	Eurocities	Just Transition Fund	Submission to Public Consultation	COM	12/03/2020
16	Eurocities	Eurocities statement on the green paper on a 2030 framework for climate and energy policies	Statement		06/2013
17	Eurocities	The European Green Deal Delivering results for citizens with Europe's cities	Reaction		02/2020
18	Eurocities	A strong cohesion policy for Europe and its citizens	Policy Paper		06/2017
19	Eurocities	Eurocities position on the clean energy for all Europeans package	Position Paper		05/2017
20	Eurocities	Cohesion policy post-2020, A strong policy for Europe and its citizens	Policy Paper		10/2019
21	Cohesion Alliance		Letter	Council President, MS Governments	10/12/2019

22	210 cities, supported by C40, Eurocities, CEMR, ICLEI, Energy Cities, Climate Alliance, et al.	Cities call for a more sustainable and equitable European future	Open Letter	Council President, MS Governments	30/04/2019
23	ICLEI, et al.	Europe needs and wants an ambitious, effective and fossil fuel free cohesion policy delivering on climate neutrality	Open Letter	Council, EP, COM	28/01/2020
24	41 mayors of cities in coal regions	Declaration of Mayors on Just Transition	Declaration	Council, EP, COM, Energy Community	09/2019
25	Cohesion Alliance	Cohesion alliance for a strong EU cohesion policy beyond 2020	Declaration		
26	ICLEI, Energy Cities, et al.	Letter from the Coalition for Higher Ambition to the New Commissioners	Letter	COM	09/12/2019
27	CEMR, Climate Alliance, E3G, Energy Cities, Eurocities, ICLEI	Building on local climate and energy experience in Energy Union Governance	Position Paper		21/03/2018
28	Local authorities of Bavaria, Baden-Württemberg, Saxony	Opinion of the European Offices of the Local Authorities of Bavaria, Baden-Württemberg and Saxony on the proposal for a directive amending Directive 2010/31/EU on the energy performance of buildings	Position Paper	COM	
29	Energy Cities, et al	EU funding must leapfrog fossil fuel use to renewable energy and energy savings	Letter	EP	25/03/2019
30	Climate Alliance, Eurocities, Energy Cities et al.	Opinion of the European Offices of the Local Authorities of Bavaria, Baden-Württemberg and Saxony on the proposal for a directive amending Directive 2010/31/EU on the energy performance of buildings	Recommendations		

31	mayors EU capital cities	A strong voice in Europe”	Declaration		21/04/2015
32	V4 Capitals + 40 cities		Letter	Council, EP, COM	11.02.2020
33	Climate Alliance, Energy Cities, ICLEI, Eurocities, CEMR	Localising the energy transition	Statement		22.06.2017

Appendix 2 Interview Guide City

Interview Guide [city]

Date:

Place:

Duration:

Interviewee:

Position:

Contact Details:

Additional Info:

Consent to recording has been given prior to interview.

INTRODUCTION

- Personal introduction
- Presentation research project
 - The thesis broadly deals with the role of municipalities in the just transition process. I am looking at the multi-level structure of the European Union and how municipalities of all sizes engage in the policy making process around Just Transition.
 - I am most interested in the proactive advocacy activities of municipalities – either individually or in a concerted way with other cities, for instance through city networks.
 - The research has two pillars: 1) I analyze written advocacy documents such as position papers 2) I conduct interviews with municipalities and European networks.
- Aims for the interview
 - I hope to find out more about [city's] advocacy activities and the processes behind it.
 - Further, I am interested in motivating factors for [city's] actions and obstacles it has to overcome.
 - Further case related interests.
- Note: The interviewee will remain anonymous in the paper.

Q: Do you have any questions about me as a person or the thesis project?

Part I – GENERAL

- 1) Could you tell me shortly about your past career and the task of your current position as [position interviewee]?**
 - a) Since when do you hold the position?
- 2) Which are the main general channels for [city] to lobby the EU / enter in an exchange with the EU?**
 - a) Do you ever do any efforts alone or do you normally join forces with other cities?
 - b) Which city networks and platforms do you use for that?
- c) Would you consider the Committee of the Regions as a representative of your interests? Why?**
- 3) Which EU institutions and bodies do you mainly target with your activity?**
- 4) What is the general internal process that [city] usually follows to formulate its position towards the EU institutions?**
 - a) Which actors are usually involved in that process?

- b) Which interests do they represent?

Part II JUST TRANSITION

- 1) **What does the catchphrase *just transition* mean to you?**
 - a) Which policy areas would you say belong to a *just transition*?
- b) **Which of those are most important to [city]?**
 - c) In what way is / will [city] be most affected by the *just transition*?
 - d) Do you think *just transition* should be on the European level necessarily connected to cohesion policy or is it a wider concept?
- 2) **Which are [city] strongest motivating drivers to be active in the field of just transition and to make itself heard in Brussels?**
 - a) Does political culture in [city] has any influence on that?
 - b) Do party politics or general political interests play the main role? Or is it rather a multipartisan (supported by a bigger political spectrum) motivation / goal of [city]?
 - c) Is it long-term guidelines that different generations of politicians in [city] follow?
 - d) Is it more classic lobby interests? Winning grants and funding?
- 3) **Do you see a change over time for the last 10 years in [city]'s aims or motivation that drives its advocacy activity?**
 - a) What would you say are the reasons for the change / stability?
- 4) **[city] signed a letter to the institution's presidents together with other European cities. Can you tell me a bit more about it. Who was the initiator of that?**
 - a) Which feedback have you received so far?
 - b) What do you hope to achieve with it?
 - c) What motivated you do sign the letter?
 - d) What are next steps regarding this?
- 5) **Do you see a change over time for the last 10 years in [city]'s efforts?**
 - a) **Can you name a few important milestones of the last years?**
 - b) Which stakeholders in [city] do you involve in the process to design your activity towards the EU?
 - a) Which municipal actors, e.g. departments of the townhall, agencies, are involved?
 - b) Which other stakeholders? Trade unions? Civil society? Citizens? Climate activists? Businesses?
 - c) Has anything about this process or who is involved in it changed over time?
- 7) **How would you put [city]'s advocacy efforts on the European level in relation to actions by the national government?**
 - a) Would you say that [city]'s behavior is in some way influenced by national positions?
 - b) Do national level actors / authorities try to influence [city]'s EU activity?
 - 8) How do you see the short and long-term impact of [city] advocacy activity in the field of just transition?
 - a) Are you satisfied with your results? Why or why not?
 - b) Do you feel like EU institutions are open to your active contribution and take your input into consideration or put it into policies?
 - c) How would you like to see the exchange to be improved?
- 9) **How do you envision the ideal involvement of municipalities in the policy making process of the just transition?**
 - a) Which levels are most important to you? (regional, national, EU)

CLOSING

Appendix 3 Interview Guide Network

Interview Guide [city]

Date:

Place:

Duration:

Interviewee:

Position:

Contact Details:

Additional Info:

Consent to recording has been given prior to interview.

INTRODUCTION

- Personal introduction
- Presentation research project
 - The thesis broadly deals with the role of municipalities in the just transition process. I am looking at the multi-level structure of the European Union and how municipalities of all sizes engage in the policy making process around Just Transition.
 - I am most interested in the proactive advocacy activities of municipalities – either individually or in a concerted way with other cities, for instance through city networks.
 - The research has two pillars: 1) I analyze written advocacy documents such as position papers 2) I conduct interviews with municipalities and European networks.
- Aims for the interview
 - I hope to find out more about [network]’s advocacy activities and the processes behind it.
 - Further, I am interested in motivating factors for [network]’s actions and obstacles it has to overcome.
 - Further case related interests.
- Note: The interviewee will remain anonymous in the paper.

Q: Do you have any questions about me as a person or the thesis project?

Part I – GENERAL

- 1) **Could you tell me shortly about your past career and the task portfolio of your current position at [network]?**
 - a. **Since when do you hold the position?**
- 2) **Which are the main general channels for [network] to lobby the EU / enter in an exchange with the EU?**
 - a. Do you ever do any efforts alone or do you normally join forces with other cities networks?
 - b. **Would you consider the Committee of the Regions as a representative of your interests? Why? How do you engage with CoR?**
- 3) **Which EU institutions and bodies do you mainly target with your activity?**
- 4) **What is the general internal process that [network] usually follows to formulate its position towards the EU institutions?**
 - a. How do you consult your members? Is there a standardized process that is followed before issuing a position paper?
 - b. Are there any general cleavages between cities?

Part II JUST TRANSITION

- 1) **What does the catchphrase *just transition* mean to you?**
 - a. Which policy areas would you say belong to a *just transition*?
 - b. **Which of those are most important to [network]?**
 - c. In what way are cities be most affected by the *just transition*?
 - d. Do you think *just transition* should be on the European level necessarily connected to cohesion policy or is it a wider concept?
- 2) **Which are [network]'s and its members strongest motivating drivers to be active in the field of just transition and to make itself heard in Brussels?**
 - a. Do you feel an ethical obligation to be active? Is climate and social policies important to you?
 - b. Does political culture in cities has any influence on that?
 - c. Do party politics or general political interests play the main role? Or is it rather a multipartisan (supported by a bigger political spectrum) motivation / goal of cities?
 - d. Is it long-term guidelines that different generations of politicians follow?
 - e. Is it more classic lobby interests? Winning grants and funding?
- 3) **Do those motivating factors differ among your members?**
 - a. **Can you see any difference between East-west; south-north?**
- 4) **Do you see a change over time for the last 10 years in [network]/cities' aims or motivation that drives its advocacy activity?**
 - a. What would you say are the reasons for the change / stability?
- 5) **Can you name a few important milestones of [network] advocacy work in the field of just transition of the last years?**
- 6) **How do you see the short and long-term impact of [network] advocacy activity in the field of just transition?**
 - a. Are you satisfied with your results? Why or why not?
 - b. Do you feel like EU institutions are open to your active contribution and take your input into consideration or put it into policies?
 - c. How would you like to see the exchange to be improved?
- 7) **How do you envision the ideal involvement of municipalities in the policy making process of the just transition?**
 - a. Which levels are most important to you? (regional, national, EU)

CLOSING

Appendix 4 Coding Scheme

Indicator	Code category	Sub-codes
Positions on Inclusiveness	Involvement in the policy formulation process	<ul style="list-style-type: none"> • Institutionalized EU – mayors dialogue • European semester process • Territorial Just Transition Plans • National Energy and Climate Plans
	Involvement in implementation design	<ul style="list-style-type: none"> • Effective application of partnership principle • Programming • Principle of subsidiarity
	Independent implementation	<ul style="list-style-type: none"> • Flexibility of funds/ grants • Capacity building
	Exchange	<ul style="list-style-type: none"> • Peer-to-peer learning • Territorial cooperation
	Inclusiveness of JT	<ul style="list-style-type: none"> • Citizens Participation • JT as social inclusion
Positions across policy domains	Budget and financial measures	<ul style="list-style-type: none"> • Role of MFF • Higher volume of total cohesion budget and JT funding • Complementarity of JT funds • Eligibility of all territories • Local bottom-up initiatives • Small scale projects • Direct funding
	Social aspects	<ul style="list-style-type: none"> • (Re-) skilling of workers • Energy poverty • Public awareness • Societal change

	Energy efficiency and renovation of buildings	<ul style="list-style-type: none"> • Binding targets • Ambitious targets • Compliance monitoring • Renovation of buildings
	Climate goals	<ul style="list-style-type: none"> • Coal phase-out • Adaptation plans • Fossil fuel subsidy
	Other	<ul style="list-style-type: none"> • Electrification of public transport • Waste disposal • City greening • Technical assistance
Reasons and arguments to support the positions	Implementation of EU policies	<ul style="list-style-type: none"> • Policy adaptation to municipal reality • Directly affected • Diversity of local needs and (financial) resources • Cities as test beds • Practical reasoning
	Objectives	<ul style="list-style-type: none"> • Meeting EU targets • Accelerating the transition • Front runners
	Legitimacy	<ul style="list-style-type: none"> • Implementers of EU policy • Importance of cities for the transition • Closest to the citizens • Economic powerhouse
	Transition impact	<ul style="list-style-type: none"> • Effect on everyone • Radical change • Achieving real justice
Reasons for venue choice	Domestic contingency	<ul style="list-style-type: none"> • Legal representation • (Friendly) relation to national government • Bureaucratic burden • Party and party group affiliation • Independent view on EU politics

	Blockage	<ul style="list-style-type: none"> • Non-involvement in allocation of funds • Missing link between beneficiary and managing (national) authority • Non-involvement in country specific recommendations
	Conflict of interest	<ul style="list-style-type: none"> • Mismatch of policy priorities • Mismatch of climate and emission reduction targets ambition • Strong political opposition • Discriminated against by national government
	other	<ul style="list-style-type: none"> • Political will • Shared challenges • Inevitability of societal change