



EU environmental policy-making:

A study of Business Associations' interest representation

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Abstract

This study contributes to the research on interest representation through online consultation at European Union (EU) level, with a special focus on environmental policy. The analysis focuses on the revision of the EU Packaging and Packaging Waste Directive, which can be subordinated to the EU's European Green Deal (EGD). Consequently, business associations' (BA) feedback on the directive's revision is systematically examined, guided by the by Carol Bacchi introduced *What's the problem represented to be?* approach. In line with that, this research demonstrates that economic interests in the revision are the BAs' primary concerns, followed by the interest in tackling environmental problems. BAs hence recognize the need to revise the directive in question to a more environmentally friendly one, however they primarily involve themselves in enhancing the (European) economy more than tackling climate change. Based on that, this study extends existing knowledge on BAs in their role as stakeholders' participation in EU policy-making. As such, the study of the feedback emphasizes the consultation process's legitimacy and the functioning of this part of the EU's policy-making procedure. In addition to that, this study's findings demonstrate that in order to reach its environmental goals outlined in the EGD, the EU's policy-makers are further required to combine the two priorities of economic and environmentally friendly legislation.

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List of abbreviations

BA	Business Association
CAP	Common Agriculture Policy
CE	Circular Economy
DG	Directorate General
EC	European Commission
EGD	European Green Deal
EPI	Environmental Policy Integration
EPR	Extended producer responsibility
EU	European Union
GHG	Greenhouse gas
IIA	Inception Impact Assessment
IPCC	Intergovernmental Panel on Climate Change
MS	Member States
OC	Online Consultation
OQ	Operational Question
PPWD	Packaging and Packaging Waste Directive
RQ	Research Question
R&D	Research and Development
SUP	Single Use Plastics
WFD	Waste Framework Directive
WPR	What's the Problem Represented to be?

1. Introduction

Consequences of climate change threaten the human safety and well-being as well as the health of the planet at multiple dimensions and an unpredictable speed and scale, based on by human behaviour caused rising global greenhouse emissions (IPCC, 2022; Adger et al., 2022; IPCC, 2023). Consequently, policy makers, governments, diverse business sectors and civil society are globally required to change habits in order to prevent and mitigate more catastrophic global climate change. To provide some examples, Diezmartínez and Short Gianotti (2022) or the Intergovernmental Panel on Climate Change (IPCC (2023: 2) make clear that policy makers are required to respond to climate change with an urgent addressing of its impact in form of i.a. “*political commitment, coordinated policies [or] international cooperation*”.

The European Union (EU), since its first introduction of environmental policies in the 1970s, seeks to have a distinct influence on the broader domain of environmental policy and sustainability, within and beyond the European continent (Rayner and Jordan, 2016). One example is its current priority *A European Green Deal*, which aims to tackle climate change threats and objectives by becoming the first climate-neutral continent (European Commission, n.d.-e). Under the EGD’s umbrella, the European Commission (EC) recently introduced the revision of the EU Packaging and Packaging Waste Directive (PPWD) on the 30th of November 2022 (European Commission, 2022). As part of the EU’s online consultation (OC) mechanism, the regulation proposal in total received 110 written feedbacks from i.a. business associations, non-governmental organizations, public authorities and EU citizens on its roadmap. These responses aim to improve the quality of the policy revision as well as to strengthen the democratic quality of the outcome (Steffek and Ferretti, 2009; Commission of the European Communities, 2002b).

With regard to the debate about the EU’s democratic deficit in its policy-making procedure as well as to the scholarly study of OC, the PPWD revision raises questions about the responses’ content and the feedback’s authors, which this study examines guided by the research question *How do business associations represent their interests in EU’s environmental policy-making?* In order to examine this, the *What’s the problem represented to be?* approach by Carol Bacchi (2009) is applied to the business associations’ (BA) feedback on the revision of the PPWD, aiming to get a better understanding of who is contributing in what way to the OC mechanism within the EU policy-making (Quitkat, 2011).

The structure of this paper is as follows: chapter two reviews the existing (academic) literature on EU environmental policy; the democratic representation through EU OC and businesses' interest in environmental policy. Afterwards, chapter three introduces necessary background information on the revision of the PPWD, based on the EC's Inception Impact Assessment. The following fourth chapter elaborates on the above introduced research question, before chapter five presents this study's theoretical framework, in line with the *What's the problem represented to be?* approach. Its method as well as the here analysed material are continuously introduced in chapter six. Afterwards, chapter seven contains the introduced research question's analysis, structured by six sub-questions. This study's findings thus are presented in chapter eight, together with a final discussion of this research's conclusions.

2. Literature review

2.1. EU environmental policy

Before reviewing the existing academic literature on the EU's environmental policy, its legal framework is introduced. The EU is competent to conduct legislation in the field of environmental policy, in form of a shared competence with its Member States (MS), in line with the Treaty on the Functioning of the European Union (2007: Art. 4). However, the Union's dedication to environmental policy was not part of its initial priorities when the EU was established. Thus, this policy area has not been part of the Treaty of Rome, establishing today's EU's pioneer Communities in 1957. Environmental policy first became a legislative interest in the late 1960s, mainly connected to pollution control measurements. The first EU environmental policy hence was adopted in form of the Birds Directive on the conservation of wild birds in 1979 (European Union, 1979), last revised in 2007. Additionally, the first environmental agenda under the name *EU's First Environmental Programme* was already introduced a few years earlier in 1973 (Stojanović and Radukić, 2006). The development intensified over the coming years and decades. Sbragia and Stolfi (2015) exemplarily argue that the Seventh Environment Action Programme (guiding the EU's environmental policy between 2014 and 2020) can be perceived as an environmental policy combining environmental interest with the advance of economic growth. Recently, the EU adopted, and the EC introduced several different initiatives, measurements, proposals and packages within its priority *A European Green Deal* (EGD). The EGD's overall aim is to tackle climate change's threats and objectives by becoming the first climate neutral continent (European Commission, n.d.-e).

The EU's interest in environmental policy occasionally seems to have a contrasting counter-interest: economic advantages. Kingston (2011) exemplarily identifies these interests as conflicting in terms of that they are the primary obstacles in contemporary EU policy formulation. In the same way, others argue that EU environmental policy mainly can be seen as a driver of economic growth and competitiveness (Delreux and Happaerts, 2016; Jordan, 2012). Based on this, some scholars identify the EU as in internal tension between environmental interests and economic advantages, by referring to the Union's policy-making procedure. Here, scholars further determine several cases of the EU clashing in between its demanding normative policies and others aiming at economic advantages. Lightfoot and Burchell (2005) i.a. argue that the EU has difficulties to integrate the policy areas of trade (liberalization) and development, hence areas of possible economic benefit for the EU, into a sustainability perspective at different occasions. Based on these challenges as a starting point, some scholars argue that the EU shows an ambivalent tension between its commitment to sustainable development and other policy areas' appealing economic values and advantages (Jaremba et al., 2019).

The scholarly debate on the EU seeking to balance its commitment to both economic development and environmental responsibility is diverse. Already during the past century, scholars resumed that the EU struggles to reconcile its "*historic commitment to economic development*" (Baker et al., 1997) while approaching its new environmental responsibility. It is argued that the origin of this are the Union's treaties, requiring both economic progress to the same degree as sustainable and fair development (Collier, 1997). An EU strategy with the aim to alter both sustainability and the European economy is its circular economy (CE) action plan, adopted in March 2020 (European Commission, n.d.-c). Academic research on both, the potential combination of sustainability and economic growth as well as on the EU's CE action plan is diverse and includes broad support for the transition to a CE, the strengthening of the European economy and to tackle climate change (Busu and Trica, 2019; Mhatre et al., 2021).

As part of the EGD, the EU since 2020 reviews, tightens up, abolishes or introduces new legal frameworks in order to transform Europe into the first climate-neutral continent. Different studies revolving around the sustainability of EU legislation identify the need for stricter regulations and Environmental Policy Integration (EPI), e.g. within the EU's Common Agriculture Policy (CAP) (Galli et al., 2020; Alons, 2017). Pe'er et al. (2020) similarly argue that the latest CAP review from 2020 shows weaknesses regarding biodiversity, climate, soil and land degradation. These examples of the studies of recently renewed or introduced EU

legislation are distinct in their argumentations of stricter and more precise standards of EU environmental policies. However, what the academic research on EU environmental policy and environmental sustainability lack is the study of how policies are in fact revised and how the legislative procedure of enhancing EU legislation de facto is generated. Hence, there is a knowledge gap on the EU's mechanisms to alter its policy within the environmental field.

2.2. Democratic representation through EU online consultation

As Bunea (2015) and Dür and Mateo (2016) outline, interest groups have a significant impact on the European institutional level of environmental policy and the design of concerned policies, which exemplarily can be expressed in form of participation in OCs or other forms of feedback periods or lobbying.

In line with the EU's *Better Regulation* agenda, first introduced by the Commission of the European Communities (2002a), the EC since 2021 aims to provide “*evidence-based and transparent*” (European Commission, n.d.-b) legislation with the aim to introduce legal frameworks by involving the public. The introduction of the agenda can be traced back to the within academia highly debated term *EU's democratic deficit* (Pansardi and Battezzorre, 2018). The term is considered to describe the Union's institutions' and decision-making mechanisms' lack of both accountability, democracy and legitimacy. The latter can in this context be defined by a “*belief in the rightfulness of authority*” (Pansardi and Battezzorre, 2018: 856). Scholars such as Follesdal (1998), Follesdal and Hix (2006) or Schmitter (2000) continuously suggest to modify this democratic deficit and the questions about the EU's legitimacy in their scholarly work. In line with this, Lynggaard et al. (2015) present that the EU follows different strategies to encounter the deficit and to improve its decision-making processes' democratic legitimacy, e.g. by including the broader public and its citizens to the mechanism. This advancing process is guided by the keywords “*openness, inclusiveness and transparency*” (Quittkat, 2011: 655-656) in order to meet and challenge the previously introduced concerns on the EU's policy-making's legitimacy. Among different objectives, the in the early 2000s introduced OCs are a policy-making tool that lately gains increased application frequencies throughout all phases of the EU policy cycle (Quittkat, 2011). It is aimed at increasing the participation of EU stakeholders, businesses, governmental authorities and citizens in the EU's legislative circle (European Commission, n.d.-d; Quittkat, 2011). Additionally, its ambition is to make the general public more aware of and inclusive in its legislative procedure. Since 2015, the OC consists of a combination of roadmap feedback

periods, public consultation periods as well as Commission adoption feedback periods and is available for the public via the EU's digital *Have Your Say* portal (European Commission, n.d.-b). Through this consultation process, the EC can be briefed and updated about different sectors' understanding and perspectives as well as detailed information on different policy frameworks (Klüver et al., 2015).

EU OCs have been studied in different ways, such as empirically in terms of stakeholders' position alignments (Bunea, 2015); OC's actual value, which according to Quittkat (2011) remains sceptical; the connection of public opinion and the mobilization to participate in the policy-making procedure (Rasmussen et al., 2014); or stakeholder diversity (Fraussen et al., 2020; Beyers and Arras, 2020). Having a closer look at Quittkat (2011) research outcomes, stakeholders from older EU MS dominate the OC at the same time as southern MS are under-represented. Additionally, participation rates are highly influenced by the OC's format, resulting in more participants the more closed the format is. These findings raise objections connected to the question of who in fact is represented in the OC procedure as well as about the debate on the validity of the EU's democratic process in general. Even though it has been shown that Directorate General (DG) Environment is one of the most active DGs making use of OC, Quittkat (2011: 672) stresses that there is a knowledge gap on "*who contributes how to the consultation process*". Similarly, other studies lack insights in the nature of consultations' content. While Bunea (2015) shows that interest groups connected to (diverse) membership and lobbying coalitions are likely to respond in a similar way to EU environmental consultations, it remains unclear who engages in and further in what way the participants contribute to the consultation process.

For that reason, academic literature shows that there is a research gap on first, who is participating and by that represented on the level of OC within the policy-making procedure of the EU. Second, what feedback is given in order to inform and influence the procedure remains unclear within the academic literature.

2.3. Businesses' interest in environmental policy

By combining the initial two introduced sub-chapters of this literature review, questions connected to the EU's policy making within the field of EU environmental policy occur, especially with regard to who is contributing to OC with what feedback. Although the accession to OC theoretically is equal to all citizens and stakeholders, Quittkat (2011) emphasizes the

important role of both money, personnel and competence to participate in the process. Similarly, Klüver (2011: 502) illustrates lobbying's characteristics as "*rather a collective enterprise than individual*", which goes in line with her research findings that salience can be beneficial if interest groups are part of a larger coalition on a policy issue. In the case of EU policy-making, a dominance of business-related interest groups within the actors participating in OC or other forms of lobbying has on multiple occasions been demonstrated (Klüver et al., 2015; Quittkat, 2011; Rasmussen et al., 2014). Reasons for this business-related supremacy are described as the interest groups' high degree of professionalisation in terms of access to resources and a well-established internal structure, which further leads to more effectiveness in lobbying or other forms of promoting political action (Klüver et al., 2015). As Dür and Mateo (2016) identify, EU environmental policy is a field of large EU competence, which continuously is characterized by experienced groups of stakeholders participating in both lobbying and OC. This shows that business-related stakeholders are mostly contributing to OC, even within the field of EU environmental policy. It can moreover be mentioned that businesses often organize themselves in BAs when participating in OC. Within the understanding of the European Commission (n.d.-a), BAs encompass voluntarily coordinated private entities that support their members' professional concerns. Nevertheless, a knowledge gap on the question of which BAs in fact contribute in what way (thus, how) to the consultation process remains.

3. Background: Proposal revision Directive 94/62/EC on Packaging and Packaging Waste

Scientific research on the EU's CE strategy is broad and diverse. As Mhatre et al. (2021) argue, waste management is one of the pioneers within the field. This is further immensely studied, exemplarily with regard to waste and packaging waste. Besides research on the nature of disposable and reusable packaging (Pålsson and Olsson, 2023), or (chemical) recycling technologies (Meys et al., 2020), several scientific studies conclude that strong policy reforms are needed in order to decrease waste and packaging waste's impact on the climate and environment. Examples are i.a. to restrict the flow of plastics into the marine environment or requirements on European municipalities to maintain environmentally friendly separation of waste (Gallo et al., 2018; Tyson, 2005). Here, forms of extended producer responsibility (EPR) or fiscal and economic instruments are i.a. highly discussed strategies and parts of solutions. Following Lorang et al. (2022), it has been shown that EPR programmes additionally enhance

both the economic as well as operational growth of plastic waste management, which led to increased rates of collection and recycling rates of waste. Besides other actions, waste management is argued to be crucial for the implementation of a CE, which continuously can be promoted by introducing and adjusting policies in the field (Mhatre et al., 2021).

Under the EU's aim to become climate neutral by 2050, different strategies such as the *Fit for 55 package*, the *EU strategy on adaptation to climate change* or the *EU biodiversity strategy for 2030* have been launched since 2019 (Council of the EU and European Council, 2022). In line with Sikora (2021) or Pianta and Lucchese (2020) demand for stricter legal EU orders and policies to achieve the EGD further under these strategies and packages, a number of existing EU legislations have lately been reviewed. Examples of concluded revisions are the revision of the Directive 1999/62/EC on charging of Heavy-goods Vehicles for the use of certain infrastructures (Eurovignette Directive); the Revision of Annexes IV and V of the Regulation on Persistent Organic Pollutants or the Revision of the TEN-E regulation for energy infrastructure (European Parliament, n.d.).

Another EU legislation under current revision is the 1994 introduced Directive 94/62/EC on packaging and packaging waste (European Parliament and Council, 1994) (from here on PPWD), regulating the management of both packaging and packaging waste in the EU MS (European Union, 1994). In line with the EU's *Plastics Strategy*, the EGD and the new CE Action Plan, the European Commission (2020b: 1) clarified that the PPWD directive needs "*clearer and more specific requirements*" on its structure, arrangement as well as the reusability and recoverability of packaging. Additionally, over-packing and the reduction of packaging waste, in general, shall be addressed. Hence, the overall aim of the revision of the Directive is on the one hand to improve the recycling of packaging and on the other to reduce the overall amount of packaging waste as well as to decrease over-packing (European Parliament, 2021).

This revision concerns a complex policy process that i.a. involves feedback and contributions from stakeholders, businesses, citizens as well as governmental authorities. Additionally, it has implications for several different other policy areas such as environmental protection, product design or waste management at the same time as it has consequential significance for businesses and customers. This complexity revises a highly interesting subject of inquiry, particularly regarding the within academia debated and expected criteria on environmental policy and sustainability. Another scientific appealing aspect of the PPWD revision is its legal procedure,

which includes several stages of public consultation periods. Especially concerning the EU’s debated democratic deficit, this revision allows studying the Union’s policy-making’s legitimacy.

Table 1. Timeline of the revision of Directive 94/62/EC on packaging and packaging waste (European Commission, n.d.-f).

11 June 2020 - 06 August 2020	Roadmap – feedback period
30 September 2020 - 06 January 2021	Public consultation - consultation period
01 December 2022 - 24 April 2023	Commission adoption – feedback period

Having a closer look at the revision, it followed the above (in Table 1) stated timeline of the EC’s initiative. In form of an *Inception Impact Assessment (IIA)*, citizens, stakeholders, public authorities and governments were informed about and can follow the initiative’s outlines on the planned revision of the PPWD. The European Commission (2020b) structured the paper as follows: First (1), Context, Problem definition and Subsidiarity Check, second (2), Objectives and Policy options, third (3) Preliminary Assessment of Expected Impacts and fourth (4), Evidence Base, Data collection and Better Regulation Instruments.

The overall three main aims the revision addresses are (a) the reduced competitiveness of recycled packaging material compared to virgin feedstock, (b) to tackle the increasing amounts of packaging waste, which the packaging sector i.a. is one of the biggest contributors to. Moreover, a growth of consumption overall, the usage of disposable packaging, increasing sales online and over-packing contribute to the growth of packaging waste within the EU. Additionally, the revision (c) aims to provide support to MS to ensure cost-effective recycling and waste management, in line with the in 2018 introduced waste legislative package (European Commission, 2020b). The document further outlines that the current Waste Directive from 1994 lacks a clear legislative framework outlining requirements on packaging with re-used and recycled packaging material as well as that the Directive in its current form is rather vague, which can be seen by the MS’ weak enforcement.

Continuously, the European Commission (2020b: 2) lists its objectives for the revision of the Waste Directive. In general, these are to secure the efficiency of the “*free movement of*

packaging and packaged goods” on EU’s internal market through the standardization of current regulations. At the same time, the EC addresses adverse effects on the environment by recycling targets and impacts on human well-being, based on increased packaging waste generation and over-packing. Additionally, EPR fees are introduced as a method these objectives shall be achieved through (European Commission, 2020b).

Furthermore, a set of policy options is laid out in the IIA. Hence, what will be included in the coming revision are first, processes to revise the fundamental criteria to enhance product design aiming to reuse and encouraging high quality recycling. Second, measures to decrease the amount of packaging waste and over-packing will be part of the revised Waste Directive (European Commission, 2020b). These targets may either be general or be adopted for particular materials and packaging formats and could contain mandatory reuse of specific packages, especially within transportation packaging. Further, the European Commission (2020b) will examine other measures such as the necessity of reusability and recyclability of packaging; the restriction of some specific materials; or the simplification of packaging.

Eventually, the expected impacts of the Waste Directive’s revision are discussed in the IIA. Under the likely economic impacts, the European Commission (2020b) emphasizes increased long-term planning for investments in packaging, which also will have beneficial effects on the international market within the field packaging. Overall, costs for both the treatment and collection of waste are anticipated to be cut down after an initial short-term phase of (i.a. manufacturers’) investments during the shift towards the introduction of reuse systems, which would also stress the establishment of new business models. Moreover, social impacts of the revision of the Waste Directive are expected for producers, consumers and retailers who need to adapt to both new economic models and consumption approaches. Further, the revision may have implications for the requirements of food packaging in terms of safety and hygiene (European Commission, 2020b). Likely environmental impacts are further expected to reduce greenhouse gas (GHG) emissions, enhance the efficiency of resources, minimize the pollution to water, soil and air as well as to mitigate the negative health effects of air pollution. Eventually, impacts on the simplification and administrative burdens are discussed, which can be divided between businesses and MS. The first will hence have an expected advantage from the enhanced legal harmonization and transparency of product specifications. However, extra administrative burdens are anticipated on businesses, even though the EPR might indirectly lower businesses’ burdens. The latter one, MS may have a better cost-effectiveness connected to the clearer requirements of packaging in the Waste Directive. Nevertheless, supplementary

administrative burdens and resources are expected to affect MS, as illustrated by the European Commission (2020b).

Based on this IIA, citizens, public authorities and stakeholders between the 11th of June 2020 and 6th of August 2020 had the possibility to share their feedback on the roadmap of the revision of the Waste and Packaging Waste Directive in form of written responses.

4. Research Question

The overall purpose of this study is to contribute to the academic research on interest representation in form of OC at EU level, with a special focus on environmental policy. This study's literature review (chapter two) introduced research gaps within the inquiries on the nature of EU environmental policy; the EU's OC process; and BAs' participation in the consultations. However, it remains unclear how business-related stakeholders, who mostly participate in lobbying and the OC processes, contribute to the policy making, which is essential in order to get a better understanding of the EU's consultation mechanism. In other words, there is a gap in academic research on OCs' content, which requires the examination of who is contributing in what way to this moment of the EU policy-making procedure. To that end, this study analyses the OC's feedback on the IIA on the PPWD revision in order to examine how BAs in their role as stakeholders contribute to the policy-making process and how they represent their positions. By that, this study gives implications on how OC in general is used within the EU policy-making as a means of expressing a specific sector's interests. Additionally, the significance and implications of these interests are meaningful for a better understanding of the democratic representation of stakeholders at EU level.

This research is guided by the following research question (RQ):

- **QR:** How do BAs represent their interests in EU's environmental policy-making?

It should be noted that the BAs' *interests* here imply their respective discourses and argumentations in the committed feedback to the EC. By analysing these interests, the BAs' perspectives, disagreements, questions or counterproposals can be identified, which in a second step can give more general implications about the way in which the BAs represent their interests in EU's policy-making within the field of environmental policy.

5. Theoretical framework

The theoretical approach '*What's the Problem Represented to be?*' (WPR) is a framework introduced by the Canadian-Australian political scientist Carol Bacchi (2009), aiming to analyse and study policy through a critical lens. WPR's fundamental objective overall is based on the conception of *problematization*. In contrast to a rather universal and conventional understanding that governments introduce policies in order to react to or solve pre-existing problems, the WPR approach demonstrates that policies themselves construct and give shape to "*implied 'problems'*" (Bacchi, 2009: x). In other words, WPR signifies that policy issues are constructed through a process of problem representation and that society is governed in terms of *problematizations* (Bletsas, 2012). The approach's name '*what's the problem represented to be*' originates in this *problematization* perception, which moreover stresses governments' active role in creating policy problems. WPR continuously aims to provide a comprehensive understanding of how policy-making can be scrutinized in the broader context of the way governance appears as well as what consequences it has for those being governed (Bacchi, 2009). With regard to the fact that the word *problem* can encompass diverse meanings, Bacchi (2009) clarifies that it within the understanding of her approach implies the type of transformation or change suggested and indicated by a specific policy. By that, the relation between discourse and other social aspects, such as social identities, ideologies, institutions or power are taken into consideration in an WPR-guided study (Tawell and McCluskey, 2022; Van Aswegen et al., 2019).

Epistemologically, the WPR approach is influenced by the intellectual works of the French philosopher Paul-Michel Foucault (1994) and the by him highly influenced tradition of post-structuralism (Goodwin, 2011). The theory initiated a highly influential movement in the discipline of social thought in the late 20th century, challenging the philosophical approach of structuralism by Lévi-Strauss (Delanty and Strydom, 2003). Continuously, this (new) post-structuralist movement stresses the interconnection of power and knowledge as well as how they are adopted as mechanisms of social control through different institutions within society. As Delanty and Strydom (2003: 323) illustrate, the post-structuralist movement additionally is broadly understood as an extension to the "*Marxist 'permanent revolution'*" within the realm of culture, thought and language. Bacchi (2009) applies this epistemological post-structuralist understanding as an encouragement to discover on the one hand the political forces constructing

the content of policies and on the other one how they operate in political discourse and political action.

Continuously, the WPR approach ontologically emphasizes a social constructionist perspective that acknowledges the concept that our comprehension of the world is influenced by socio-political factors as well as that human beings form and compose knowledge. Thus, a policy is perceived to be shaped within a cultural framework, where a special focus lies on the ways in which problems are socially constructed. This goes in line with Bacchi (2009) underscoring the role of problem-questioning in her approach. The curiosity about the way governments compose problems as well as their political priorities constructs this post-structural theory and regulates the way in which the analysis of social reality is structured in this study.

Exemplarily in international social policy analyses (Tawell and McCluskey, 2022) as well as within studies in the field of education (Magnússon et al., 2019; Bills and Howard, 2017), the WPR approach has been widely applied. Within the field of EU studies, Bacchi's WPR approach additionally provides a significant contribution to policy analyses across a wide range of policy areas and fields. In this manner, also problems represented in EU environmental policy have extensionally been studied, such as on European aquaculture (Ertör and Ortega-Cerdà, 2017) or the EU Green Infrastructure Strategy (von Post et al., 2023).

With regard to that the WPR approach combines both this epistemological theory as well as a methodology, its further application consists of six questions that can be applied in order to address the represented problems in policy (Bacchi, 2009). As these questions belong to this study's methodological chapter, they are introduced in the following, sixth chapter.

6. Method and material

To address the stated RQ, this study consists of a qualitative discursive analysis, which corresponds to an interpretative examination of the BAs' responses on the roadmap of the revision of the PPWD. The *What's the problem represented to be?* (WPR) method, introduced by Bacchi (2009), provides a framework to understand problematizations through a discursive analysis, which is applied in this paper's analysis. Here, the focus on the *meaning* of words plays a crucial role, as similarly introduced by Pansardi and Battegazzorre (2018).

The overall aim of discourse analysis is to study the relation between discourses and social reality by emphasizing language's role as a resource of power (Bryman, 2016). As Nelson and Hardy (2011) point out, discourse analysis is based on the understanding that social interactions can only be fully understood by recognizing their discourses. Discourse analyses as an interdisciplinary approach i.a. adopt methods from linguistics in order to study a discourse's structure, content, argumentation, lexical style, rhetoric or pronouns (Van Dijk, 1993). Furthermore, the method is a central and leading approach to EU and European studies, as they diversify the field (Pansardi and Battezzar, 2018).

As Lynggaard et al. (2015) illustrate, academic literature is on the one hand rich on research exploring how discourses in civil society shape a common political scope through the EU. On the other hand, scholars further apply discursive methods in order to study how discourses affect policy making, where discourses can be examined as an independent variable, causing both policy and institutional transition. In this line, Vaara (2014) and (Sternberg, 2013) demonstrate how discourse analysis can be applied in order to study the EU as well as its legitimacy regarding the understanding of discourses as ideas, beliefs and knowledge .

However in the case of WPR, the approach's method emphasises "*how subjects are constituted within policies*" (Bacchi, 2009: 265), in line with post-structuralist discourse psychology. Similarly, Delanty and Strydom (2003: 323) emphasize post-structuralism as a deconstructive method that seeks to dismantle traditional patterns of thinking, particularly those embedded in scientific discourses, that "*sustain power relations*". Based on that, Bacchi (2009: 20) WPR approach advances a critical perspective towards *knowledge* as well as it seeks to confront "*taken-for-granted*" notions.

Before introducing this study's method's operationalization in detail, its material is presented. The selection of this study's corpus thus follows the understanding that the impact and character of political discourses are best accessible by analysing its empirical representation through textual material (Lynggaard et al., 2015). Thus, this study's material is secondary data, in form of the BAs' conducted feedback on the PPWD's IIA. The EC received these responses during its roadmap period between 11 June and 06 August 2020. Hence, this study does not analyse the represented problems in the PPWD proposal itself but the evaluations on the revision. This goes in line with the need to enhance the knowledge gap on who contributes how to the EU's OC, as well as with the method's author Bacchi (2009), who outlines that a broad range and quantity of texts can be applied to the WPR approach. Further, the amount of received and valid

feedback instances correspond to 109 in total, whereof 55 (50,46 per cent) originate from BAs (European Commission, n.d.-g). Due to language barriers, exclusively feedback submitted in English language is considered in this study, which incorporates 45 out of the 55 BAs' responses, all available via the European Commission (n.d.-g) *Have your say* portal. The feedback is universally accessible in either text form on the EC's homepage or downloadable documents in PDF. Additionally, this analysis takes the EC's IIA into consideration as it outlines the essential fundamentals of the PPWD revision, which the BAs comment on (European Commission, 2020b).

In order to study and identify the construction of a policy's problematization, the WPR approach to policy analysis' operationalization consists of six critical and systematically ordered questions Bacchi (2009: xii) states the questions as follows:

1. *What's the 'problem' represented to be in a specific policy?*
2. *What presuppositions or assumptions underlie this representation of the 'problem'?*
3. *How has this representation of the 'problem' come about?*
4. *What is left unproblematic in this problem representation? Where are the silences? Can the 'problem' be thought about differently?*
5. *What effects are produced by this representation of the 'problem'?*
6. *How/where has this representation of the 'problem' been produced, disseminated and defended? How could it be questioned, disrupted and replaced?*

Concerning this research, Bacchi's questions can be applied to the study of the BAs' feedback on the PPWD revision's roadmap. Thus, the WPR-guiding questions are applied and by that reframed to the following operational questions (OQ).

As the first question aims to identify the implicit problem(s) in this study's material, it can be adapted to:

OQ1: What is the problem of environmental policy-making represented to be in the BAs' feedback on the revision of the PPWD?

Based on the analysis of OQ1, the study finds that the problem represented in the BAs' feedback is sustainable economic growth. Based on this finding, the remaining five questions are adapted to the outcome of OQ1. Thus, OQ2 intends to both recognize and examine the *conceptual logics* that underlie the particular problem representation. These logics imply established meanings

that a particular problem representation builds on (Bacchi, 2009). Henceforth, OQ2 can be adapted to:

OQ2: What presupposition or assumptions underlie this representation of sustainable economic growth as a problem?

The conditions that facilitate a problem representation are central to the WPR approach's third question which consists of two complementary purposes. On the one hand, (non-discursive) developments or decisions that lead to the problem representation identified in the study are essential, on the other, this third question acknowledges that competing representations of the problem could have resulted in another outcome (Bacchi, 2009). In other words, the historical background of a represented problem is to be examined under question three, which can be changed to:

OQ3: How has this representation of the sustainable economic growth come about?

Question number four reflects on silenced elements and considers discussions that have been left out in the problem representation of sustainable economic growth:

OQ4: What is left unproblematic in this problem representation of sustainable economic growth? Where are the silences? Can the 'problem' be thought about differently?

In the fifth question, Bacchi (2009) accentuates the importance of a critical analysis of the effects constructed by the identified problem representation, guided by the following question:

OQ5: What effects are produced by this representation of the problem of sustainable economic growth?

The WPR approach's question number six, which builds on question three, eventually is two folded. On the one hand, it observes the way "*through which some problem representation become dominant*" (Bacchi, 2009: 19). Second, it questions if the problem representation could be considered and understood from a different perspective, hence re-problematized. By the means of this, OQ6 can be adjusted to:

OQ6: How/where has this representation of sustainable economic growth been produced, disseminated and defended? How could it be questioned, disrupted and replaced?

In order to analyse the six OQs, the application of three further analytical tools is introduced. First, the application of linguistic instruments is central to a discursive analysis, which contains the feedback's structure, content, argumentation, lexical style or even rhetoric, which this analysis borrows. Discourse analyses moreover intend to answer “*who uses language, how, why and when?*” (Van Dijk, 1997: 2), which can be seen as an indirect leading question of this qualitative analysis. Additionally, an understanding of the feedback's context (hence, where it emerged from) is necessary to understand in order to analyse the OCs feedback (Bryman, 2016). The mixture of these different analytical perspectives in combination with this study's operationalisation hence aims to answer this study's RQ.

The analysis of the here selected secondary data is constructed in a transparent and chronic course, working through the above elaborated OQs of the WPR approach on policy analysis.

7. Analysis

The analysis of the 45 composed feedbacks on the PPWD revision is based on an in the previous chapter (chapter six: method and material) introduced combination of six integral questions. These inquiries critically analyse the BAs' responses on the IIA by applying different angles and perspectives on the problem represented. Eventually, this thesis answers its RQ by combining the findings of this analysis chapter.

In its nature as feedback, the here analysed corpus are responses to the European Commission (2020b) IIA, introducing the revision of the PPWD. As previously stated, this analysis does however not analyse the IIA itself but the BAs' responses to it. A background on the IIA is represented in chapter three. The 45 BAs, whose feedback are analysed in this study, are (almost) all registered in an EU MS, whereof the broad majority of them in Belgium (25), followed by the Netherlands and Germany (six feedbacks each). One BA is registered in the United Kingdom, thus outside the Union. The size of the BAs ranges from *micro*, *small* and *medium* to *large*. More, it can be noted that the BAs cover a wide spectrum of interests and diversity of members of businesses. However, neither their origin, nor the size of the BAs are considered as relevant or as factors of interest for this analysis.

7.1. OQ1: What is the problem of environmental policy-making represented to be in the BAs' feedback on the revision of the PPWD?

In line with WPR's previously elaborated theoretical framework, EU's society in all its MS is governed through problematization, because policies, or in this case the BAs' feedback construct problems (Bacchi, 2009). This first OQ aims to identify the dominant problem representation of environmental policy-making in the BAs' responses on the IIA, which introduces the revision of the PPWD. While the analysed material may demonstrate conflicting (or even contradicting) problematizations, which makes the identification and representation of an implied problem rather demanding, Bacchi (2009: 4) suggests that the problem representation in such cases can be simplified by investigating "*how funds are targeted*".

The analysis of the feedback material reveals that the problem of environmental policy-making represented in the 45 responses as well are diverse and occasionally conflicting. These diverse problematizations can however be divided into three categories: First, problematizations within the social domain; second, problems connected to environmental sustainability; and third, the discussion of discourses associated with the role of the (European) economy in the revision's IIA. Nevertheless, the dividing lines between these discussed problematizations are not always crystal clear. Under the first category of problematizations within the social domain, exemplarily the International Association for Soaps Detergents and Maintenance Products (2020) call on considering socio-economic adjustments of the in the IIA outlined framework. By this, BAs highlight the importance to "*consider the impact of [increasing costs for packaging manufacturers] for consumers in lower socio-economic groups*" (European Snacks Association, 2020: 3). Thus, some stakeholders problematize the socio-economic consequences of increasing costs in the manufacturing of packaging material. Nevertheless, these social problematizations are merely expressed by a small group of contributors.

Second, the responses show a more extensive narrative on problematizations connected to the category of environmental sustainability. Within this domain, discussions to a large degree concern reflections on the broader dimension of the reusability of packaging material (i.a. Extended Producer Responsibility Organisation, 2020; FoodDrinkEurope, 2020). Here, a diversity of discourses is used to describe ideas connected to the reuse of materials, such as *recycled content* (Swedish Forest Industries Federation, 2020); *life cycle of packaging*

(FEFPEB, 2020); *recoverability of packaging* (Verband der Chemischen Industrie, 2020) or *Secondary Raw Materials* (The Alliance for Beverage Cartons and the Environment, 2020). These formulations show that the associations classify different aspects of the reuse of materials as essential. On the one hand, they argue that the problem represented in the IIA responses revolves around the definition of recycled and reused packaging material. While some argue for a definition that focuses on *Design for high quality recycling* (FEFCO, 2020), others discuss a minimum quality standard for recycled material (i.a. Polski Związek Przemysłu Kosmetycznego, 2020) or an increased reflection on the Waste Hierarchy in the PPWD revision (EuroCommerce, 2020; Reusable Packaging Europe, 2020). The European Union (2008) introduced a five-step waste hierarchy that defines preferred methods for waste management and disposal in the EU Waste Framework Directive (WFD). On the other hand, different BAs additionally discuss legally “*binding recycled [contents]*” (FEAD, 2020: 4) of or other requirements to increase the amount of recycled packaging material. However, these problems discussed under the umbrella of environmental sustainability are in the majority of cases argued to only be applicable if they make economic (as well as occasionally technical) sense. Particularly, the BAs express a preference that environmental benefits should include profits for the associations’ members. This detection leads the analysis of the problem represented in the responses to the PPWD IIA to its third category, namely the European economy’s role.

Third, a multitude of discourses and ideas relate to the role of the European economy. Indeed, the fact that the revision of the PPWD in a broader perspective can be located under the umbrella of the EU CE action plan, it is not remarkable that the reasoning on economics finds a considerable attraction in the corpus material. However, expressions on the ideas connected to economic problems are on the one hand highly associated with the EU internal (single) market, that guarantees the free movement of goods, services, capital and persons since 1993 (European Union, n.d.-b). A large frequency and application of variables include i.a.

- different combinations of the *(well-functioning of) the internal market* (i.a. PlasticsEurope, 2020; The European Organization for Packaging and the Environment, 2020);
- *free movement (of packaging)* (i.a. The Alliance for Beverage Cartons and the Environment, 2020; FEFCO, 2020); or
- *(to spur) economic growth* (i.a. Verband der Chemischen Industrie, 2020; Cefic, 2020).

Based on these findings, the empirical data suggests that the stakeholder groups emphasize the well-functioning of the internal market has a high priority in the feedback on the revision of the PPWD, nevertheless in combination with some environmental interests (as discussed in the previous category). On the other hand, problematizations connected to economics further revolve around the CE action plan and its implementation, which aims to “[pave] the way for a cleaner and more competitive Europe” (European Commission, n.d.-c). Examples of further variables connected to this sub-category among others are

- *investments in Research and Development (R&D)* (EuroCommerce, 2020);
- *resource efficient economy* (Flexible Packaging Europe, 2020);
- *net-zero economy* (European Paper Packaging Alliance, 2020);
- *circular bioeconomy towards climate neutrality* (i.a. European Bioplastics, 2020);
- *GHG and energy savings* (i.a. European Recycling Industries' Confederation, 2020);
- *or circular and resource efficient economy* (i.a. APEAL, 2020).

These discourses, ideas, beliefs and reflections overall express a broad support for the CE implementation as well as that BAs highlight the need for research on the same terms as investments in the accomplishment of the agenda for sustainable growth. The choice of these discursive formulations linked to the CE in general stresses the business sectors’ perception, practice and interest in converting their (on many occasions long and deep) established processes. Concerning the identification of (investments in) further R&D, it however remains unclear who should bear the costs for the expenses (EuroCommerce, 2020; International Association for Soaps Detergents and Maintenance Products, 2020). Additionally, the European Brands Association (2020) stresses the investments in R&D instead of an ERP, which would minimize the economic burdens on the business sector.

By integrating these insights on the discursive character of concepts related to the represented problematization associated with the EU internal market as well as with the CE action plan, OQ1 can be addressed as follows: The BAs’ dominated problem representation in their feedback on the PPWD’s IIA revolves around enhancing sustainable economic growth while ensuring environmental protection. In line with the WPR’s understanding that (in this case) the EU is governed through problematization, this first step identifies the BAs’ dominant problem representation as *sustainable economic growth*.

7.2. OQ2: What presupposition or assumptions underlie this representation of sustainable economic growth as a problem?

OQ two intents to both recognize and examine the *conceptual logics* that regulate the introduced problem representation. These imply established meanings or assumptions that the sustainable economic growth problematization constitutes and builds on (Bacchi, 2009). These presuppositions can be both of the nature of ontological or epistemological assumptions, such as background knowledge or worldviews. This part of the analysis is hence not interested in the BAs' individual beliefs, but the feedback's assumptions "*that lodge within problem representation*" (Bacchi, 2009: 5). Taking this as a starting point, this sub-chapter intents to uncover the underlying conceptual logics that shaped the representation of the problem of sustainable economic growth within the responses on the IIA on the revision of the PPWD. In line with WPR's theoretical origin in post-structuralism, this analysis consequently focuses on social and cultural presuppositions, which the problem representation is based on.

In order to uncover these underlying assumptions in the responses submitted by the BAs, their discourses are analysed (as introduced in chapter six.) Following Bacchi (2009: 7), discourses here can be defined as systems expressed in "*more than language*". As such, the WPR approach is based on the understanding that the here analysed material's meaning is constructed through language. This discursive analysis aims to identify how such meaning is generated. In order to do so, Bacchi (2009) suggests to identify binaries, key concepts as well as categories in the responses by the application of a discursive analysis.

7.2.1. Binaries

Starting with the identification of binaries in the BAs' feedback, these are often hierarchical as well as that they have a central function in shaping the problematization in question (Bacchi, 2009). The analysis of the 45 feedbacks reveal that the BAs discuss various conflicting dichotomies linked to the represented problem of sustainable economic growth. One rather generally applicable and comprehensive binary can be illustrated here: challenges versus opportunities, where the latter one are more advantaged than the first. This dichotomy has a distinct function in the understanding of the problem representation of sustainable economic growth in the here analysed feedback. Hence, the BAs discuss various examples of challenges and objectives of the previously identified problem representation. These i.a. include the discussion of possible restrictions of some materials. While the German BA

Industrievereinigung Kunststoffverpackungen (2020) warns for over-regulation, see “*we urge the Commission not to over-regulate, especially by imposing market restrictions*”; Flexible Packaging Europe (2020) stresses the importance of a full impact assessment before introducing material restrictions. Other, rather stricter associations do not support any limitations of the allowed packaging materials (FoodDrinkEurope, 2020; International Association for Soaps Detergents and Maintenance Products, 2020; European Organization of the Sawmill Industry, 2020). The European Organization for Packaging and the Environment (2020: 3) additionally stresses that material restrictions would “*fail to deliver the right compromise between packaging functionalities and recyclability*”, whereas another group of BAs only argue for the exclusion of their materials from such restrictions (FEFCO, 2020). On the other side of this binary, the BAs discuss opportunities of their problem represented, such as the introduction of EPR systems (introduced in the background chapter three). Thus, Reusable Packaging Europe (2020: 2) highlights EPR as *crucial* and requires EPR principles to be “*applicable to the broadest possible range of products*”. In a similar way, European Bioplastics (2020: 4) supports the EPR and adds information about what the fee shall cover: “*it should be foreseen [...] that the fee [...] should also cover the cost of the recycling in composting/AD facilities*”. Another example is the European Carton Makers Association (2020) stressing the opportunities of EU-wide harmonized EPR schemes.

This example of binaries echoed in the 45 feedbacks on the IIA thus stresses how language both strengthens as well as limits our ideas and knowledge. In line with the by Bacchi (2009) introduced analysis of the hierarchy in binaries, the problem represented (sustainable economic growth) poses economic challenges, that however can be transformed into economic opportunities.

7.2.2. Key concepts

WPR’s second step in order to uncover and identify established meanings or assumptions that the sustainable economic growth problematization constitutes and builds on is the consideration of key concepts in order to “*see which meanings are given to those concepts*” (Bacchi, 2009: 8). These key concepts often emerge from contrasting political ideologies as well as that they are *relatively* open-ended.

The discourse analysis of the feedback identifies *influence* as a key concept in the responses on the IIA. The primary objective of the responses on the PPWD revision’s roadmap, illustrated

by Klüver et al. (2015), is to inform the EC about the BAs' understanding as well as perspectives on the roadmap's IIA. In other words, the BAs influence the EC with their critique on, agreement with or general reflections on the IIA. Following (Steffek and Ferretti, 2009), this progress additionally improves the legislative and democratic quality of the EU decision-making. In a broader picture, the BAs thus affect or impress the EU's policy-making procedure, even though the OCs outcomes officially are not binding to be implemented in an eventual policy. Nevertheless, they exercise pressure on policy-makers as the OCs have political consequences, as Quittkat (2011: 672) explains: "*once in the open, results and arguments need to be taken into consideration and rejection needs to be based on good counter-arguments*". As discussed in chapter two (literature review), the mechanism of *influencing* the EU's policy-making procedure can furthermore be understood as a response to the Union's democratic benefit, stressing its accountability, democracy and legitimacy (Pansardi and Battezzorre, 2018).

The study of the feedback reveals that the BAs acknowledge their opportunity to *influence* the revision of the PPWD by participating in the OC progress. This can be seen by the fact that at least eleven feedbacks particularly express their willingness to participate in the OC. See e.g. "*we welcome the possibility to comment on the [IIA]*" (European Council of the Paint Printing Ink and Artists' Colours Industry, 2020: 1). Additionally, some other BAs indicate a form of appreciation to be able to contribute to the policy-making with their opinions, such as MedTech Europe (2020), that "*welcomes the opportunity to contribute to the initial roadmap consultation*". The expressions welcoming the OC feedback mechanism on the one hand can be understood as a standard phrase introducing their response without any further relevance of this formulation. The fact that more than ten of the 45 feedbacks however include this welcoming introduction on the other hand stresses the BAs' willingness and appreciation to participate in and thus influencing this stage of EU's policy-making. It signifies that the BAs are aware of both their right to affect the policy-making by OC as well as of their power in terms of enhancing the EC.

Consequently, the empirical data shows that *influence* can be understood as one central key concept in the BAs feedback on the PPWD revision roadmap, in line with Bacchi (2009: 8) understanding of a "*hotly contested*" concept.

7.2.3. Categories

A third stage within the WPR process to uncover presuppositions or assumptions underlying the representation of the problematization of sustainable economic growth (OQ2) is to identify central categories in the IIA feedback. As the WPR approach is rooted in post-structuralism, these categories are comprehended as social-constructed. Thus, Bacchi (2009: 9) identifies the categories as “*people categories*” that have an important role in governing. The WPR approach continuously argues that these people categories shall be given a particular meaning to the problem representation of sustainable economic growth itself. Based on at the one hand consumers’ and on the other one businesses’ central role in the problem representation of sustainable economic growth in the feedback on the IIA, these two categories can be identified as essential to the study of the assumptions underlying the BAs’ problem representation.

Both people categories have an important role in the conducted feedback and to some degree an interrelated connection. In other contexts, they however occur in tension. On the one hand, consumers and businesses both have an essential role for the (functioning) of the European market as it would not work sufficiently if one part would be missing. Thus, both also play an important role in implementing a CE. Exemplarily the European Brands Association (2020) stresses this connection by acknowledging the need to empower consumers on the transition towards a CE: “*To empower consumers in the circular economy [...] understandable and EU-harmonised information [...] is key.*” However, on the other hand, what distinguishes the two people categories can be illustrated as possible power relations between consumers and businesses. Related to their contribution to CE, several feedbacks evaluate the importance of customers’ acceptance for all the transition’s (e.g. economic) impacts (Polski Związek Przemysłu Kosmetycznego, 2020). Other BAs highlight the importance of businesses to inform their customers adequate and reliable on waste management and separation of packaging waste (i.a. FNADE, 2020), see “*better information and incentives to consumers*”.

By summarizing this second OQ of the WPR approach, which aims at investigating on the underlying assumptions of the problematization of sustainable economic growth in the 45 conducted responses, the three essential factors of binaries, key concept and personal categories can be identified. Thus, the problematization represented in the IIA feedback revolves around the binaries of challenges versus opportunities, which are profoundly discussed in the BAs’ feedback. Second, the key concept of influence plays a remarkable role in problematizing sustainable economic growth in the responses. Eventually, the personal categories of consumers

and businesses give the problem representation a distinct meaning, as they both have a clear relation to and competence on the problematization.

7.3. OQ3: How has this representation of sustainable economic growth come about?

The WPR approach's third step in analysing the dominated problem representation of sustainable economic growth investigates on how the problematization occurred. In order to do so, this third OQ consists of two interconnected objectives, which Bacchi (2009) presents as follows: On the one hand, a non-discursive method is applied in order to identify both developments and decisions that had a recognizable impact on the formation of the BAs' problem representation. On the other hand, the recognition of the possibility for things to have taken an alternative development is central. Thus, Bacchi (2009: 10) stresses an understanding that "*competing problem representations exist both over time and across space*". For this purpose, the application of Foucault's *genealogical* theory (Foucault, 1977 in Dumont, 1998) can be applied. The philosopher's approach reviews the represented problematization's roots by acknowledging the various power dynamics that shaped its outcomes as well as disregarding the defeated ones (Bacchi, 2009). Thus, the genealogy theory is argued to follow a rather unclear direction with unpredictable outcomes.

The represented problematization of sustainable economic growth in the BAs' responses builds on a variation of developments and decisions, such as EU policy programmes that had an influence on the here analysed feedback. In this manner, the overall development of the EU's interest in environmental policy has a general meaning for the BAs' responses. As introduced in this study's literature review (chapter two), an in 1972 reached agreement of the European Council in Paris first expressed the necessity of an environment policy supporting economic growth (Kurrer, 2022). This announcement additionally introduced the implementation of an action program, which i.a. included the Birds Directive (European Union, 1979). As the EU's commitment to environmental policy intensified, EU-wide harmonized legislation today covers various different areas, such as climate change, pollution of air and water or waste management (Kurrer, 2022). One more recent environmental priority is the EGD, 2019 introduced by the current President of the EC, Ursula von der Leyen (European Commission, 2019). Within the EGD's framework, different roadmaps outline a large diversity of policy revisions, the introduction of new environmental legislation or other mechanisms in order for Europe to become the first climate neutral continent in 2050 (European Commission, n.d.-e). Companies

and enterprises as well as businesses and their associations within the EU's MS consequently adapted to these legislations in their daily existence and regular procedures. Likewise, the BAs sharing their feedback on the IIA on the revision of the PPWD were impacted by the EU's competence to act in the different areas of environmental policy. More specifically, the 2014 conducted *fitness check* of the PPWD identified the necessity for more precise and definite guidelines “*on the composition and the reusability and recoverable, including recyclable, nature of packaging*” (European Commission, 2020b: 1). Based on this check, the revision of the PPWD was introduced, which as well has a distinct influence on the BAs' problem representation of sustainable economic growth in the here studied 45 feedbacks.

Alternatively, some concrete legislations impacting the BAs' problem representation can be named, whereof the EU's CE action plan is the first. The European Commission (n.d.-c) presents the CE as a strategy to make Europe both “*cleaner and more competitive*”, which corresponds to the understanding of the sustainable economic growth problematization. Sbragia and Stolfi (2015) stress the importance of economic integration within the EU as one driving factor behind the CE action plan. Here, a connection to the EU's establishment and history can be made. After the Second World War, European countries were aiming at achieving long-lasting peace by closer cooperation between the EU's pioneer Communities (European Union, n.d.-a). That the in this study analysed BAs directly react to the CE action plan can exemplarily be seen by a few examples of modest critique towards the action plan. Thus, the significance of “*technology neutrality*” (Reusable Packaging Europe, 2020: 1) as well as the coherence with other existing EU legislation is demanded. FoodDrinkEurope (2020: 1) additionally stresses that the CE's “*end goals [...] should be to reduce and limit the environmental footprint*” of the business sector. Similarly, the European Recycling Industries' Confederation (2020) and Reusable Packaging Europe (2020) stress the importance of first, the substantial significance of effective waste treatment and second, the need to implement the waste hierarchy in the CE action plan.

This hierarchy is part of an additional EU policy impacting the BAs' feedback. In line with the 2008 implemented WFD, the European Union (2008) introduced a standardization of definitions, methodologies and “*basic waste management principles*”. A further EU legislation impacting the problematization of sustainable economic growth is the Single Use Plastics (SUP) Directive, that encounters ten single-use plastic articles, was introduced in 2019, and thus has an impact on the PPWD (European Union, 2019). However, the SUP Directive finds some critical perception in the BAs' feedback, as e.g. NRK Verpakkingen (2020: 2) illustrates

it as a “*misleading*” concept, which not necessarily is environmentally friendly. To the contrary, i.a. FEAD (2020) nevertheless stresses the SUP Directive’s outlines.

Regarding Foucault’s genealogy theory, the existence of other competing developments that had an impact on the problem representation need to be acknowledged (Foucault, 1977 in Dumont, 1998). As such, scholars as Kingston (2011) or Lightfoot and Burchell (2005) occasionally argue that economic interests (thus, often businesses’ and their associations’ interests) and environmental sustainability can be two contradicting priorities. With regard to the time period the here analyses feedback were conducted (second quartal 2020), the coronavirus pandemic and its impacts on the (not only) European economy can be seen as a competing development contrary to the here elaborated development within EU environmental policy. In line with the European Commission (2020a) analysis of the impacts of the COVID-19 pandemic on its MS’s GDP, the European economy in 2020 has experienced an economic downturn that has not been seen before, as the EU’s real GDP fell by 6.1 per cent (Verwey and Monks, 2021). Taking this as a starting point, it can be expected that BAs and their members were likely to have encountered a period of economic uncertainty when providing the responses analysed in this study. In order to counteract the pandemic’s economic impacts, the EU presidents von der Leyen and Michel in April 2020 presented a *Roadmap for recovery*, aiming “*to prevent the collapse of the economy and to protect businesses, jobs and livelihoods*” (European Union, 2023: 3). Thus, by connecting this recovery plan and its later introduced recovery instruments to Foucault’s genealogy theory, the EU’s recovery mechanism can be interpreted as a competing problem representation in the BAs’ feedback. Several BAs additionally refer to this economic crisis in their responses to the EC, such as Cefic (2020), Freshfel Europe (2020) or Polski Związek Przemysłu Kosmetycznego (2020: 2) arguing that the “*COVID-19 pandemic impact on economic condition of sectors should be taken into account e.g. in granting proper transition time*”.

To sum up the third OQ of this WPR study, this analysis shows that the problem representation of sustainable economic growth was affected by various different developments, which mainly belong to the policy-making of the EU. On the one hand, the development towards the introduction of the first EU environmental policies in the 1970s can be emphasized as one significant progress contributing to the formation of the here identified problem representation. On the other hand, more recent legislations such as under the context of the EGD impacted the BAs’ feedback. Here, the CE action plan, the WFD or the SUP Directive can be named. Furthermore, the developments and impacts of the coronavirus pandemic on the European

economy can be understood as a contradicting or competing problem representation in the BAs' feedback.

7.4. OQ4: What is left unproblematic in this problem representation of sustainable economic growth? Where are the silences? Can the 'problem' be thought about differently?

This WPR approach's fourth OQ reflects on gaps and silences in the problem representation of sustainable economic growth, which following Bacchi (2009) empowers the critical capacity of her WPR approach. Based on the understanding that critical scrutiny provides to examine the in the BAs' feedback represented problematization, the consideration of limitations is one central contribution to this study. Guided by the question of "*what fails to be problematized?*" (Bacchi, 2009: 12), the ambition of this part of the sustainable economic growth problematization is to consider perspectives that have been silenced by the BAs. Here, the in OQ2 applied discourse analysis can be advantageous to identify misrepresentations in the here studied problematization (Bacchi, 2009). The discourse analysis can thus help to identify a contradiction in the problem representation.

The analysis of the feedback on the IIA reveals a wide range of considerations, problem components, perspectives and other relevant issues among the 45 here studied BAs. In comparison to the IIA, which the BAs' feedback are subject to, there however occur some unproblematized details. In its IIA, the European Commission (2020b: 4) announces four different categories of likely impacts in line with the PPWD's revision: economic, social, environmental as well as "*likely impacts on simplification and/or administrative burden*". While the BAs discuss the revision's probable economic effects in detail, also social impacts are (to a smaller extent) part of the associations' discourse, which can be seen at the social impacts' previous elaboration in this study. The third category of administrative burdens additionally finds interest in a small amount of feedbacks, such as in the case of The European Organization for Packaging and the Environment (2020) or the European Snacks Association (2020: 3) stating that "*the administrative burden and cost of proving compliance for businesses should be considered*". These discussions on administrative burdens are however interrelated with economic concerns. The IIA's last impact category of likely environmental significance of the policy revision however does not find significant interest in the BAs' responses. As introduced in chapter three (background on the proposal of the revision on the PPWD), the EC

primarily expects the reduction of GHG emissions; an improvement of resource efficiency; the reduction of pollution to water, soil and air and to decrease negative health effects based on air pollution. The study of the feedback displays that the BAs' discussion of these environmental impacts are rather limited. There are a few examples as the International Association for Soaps Detergents and Maintenance Products (2020) requiring voluntary initiatives of industry in order to take on plastics pollution; or CEWEP (2020: 1), who dismisses the need to tackle "*health impacts from air pollution from the incineration of unrecycled packaging waste*". These examples however do not fundamentally contribute to the overall problematization of sustainable economic growth but are rather scratching on environmental impact's surface. Thus, what can be identified as left unproblematic in the BAs' represented problematization is the comprehensive discussion of environmental impacts, although that sustainability is important for the associations' discourses.

In another dimension, companies' impacts on the policy revision in terms of mandatory recycled contents in packaging are considered. Here, FEFCO (2020: 2) argues for the introduction of mandatory recycled content exclusively for businesses and sectors that have not yet established secondary raw material markets, as overall comprehensive "*measures on mandatory recycled content are unnecessary*". With regard to the by the European Commission (2019) presented EGD, aimed "*for all to participate*", this example of discourses on the environmental impacts of the PPWD revision seems rather as disavowing ones responsibility to participate in tackling environmental impacts to the same degree as e.g. economic ones.

Thus, the BAs show an interest in environmental impacts, however they do not commit themselves to tackling this problem with the same degree of urgency as they commit themselves to enhancing economic growth or to an equal extent as the EC does in its IIA. To the contrary, the BAs attempt and try to implement the environmental discourse by subordinating it under their economic interests.

7.5. OQ5: What effects are produced by this representation of the problem of sustainable economic growth?

Guided by the WPR approach, the study of the BAs' problem representation of sustainable economic growth in its fifth step aims to identify the problem representation's effects as well as *where* and *how* they advance some while harming other social groups (Bacchi, 2009). Thus, a critical analysis of the effects of sustainable economic growth's problem representation is

required. These, Bacchi (2009) introduces, have an extraordinary influence according to the WPR approach's methodology and are rooted in various theoretical perspectives, such as the *post-structuralist discourse psychology*. In accordance with the WPR approach, the problem representation's different impacts on distinct groups of people can be identified by the analysis of three interrelated groups of effects: *discursive* effects; *subjectification* effects and *lived* effects.

In this manner, the first group's study of discursive effects follows. It builds on the WPR approach's previously examined questions and relies on the understanding that problem representations limit opportunities "*for social intervention*" (Bacchi, 2009: 16), which can have damaging consequences for some specific individuals. With regard to the dominant problem representation of sustainable economic growth as well the discourses shaping this representation, Bacchi (2009) in her WPR approach suggests to uncover alternative ways to approach the problem, which have been silenced in the feedback on the IIA.

Thus, the sustainable economic growth problematization and its framing discourses comprise some distinct social aspects that are not discussed in the here analysed material. One example is the dimension of social inclusion. In terms of the impacts on employment, the European Commission (2020b) in its IIA e.g. stresses the positive impact on the creation of jobs by establishing a bigger secondary raw material market. However, this social aspect is barely mentioned in the 45 BAs' responses. The European Organization for Packaging and the Environment (2020: 4) requires more detailed information on the impacts on employment (both losses as well as opportunities), see "*the impact assessment must duly substantiate the expected positive impacts in terms of jobs creation*". Otherwise, the BAs' debate on job opportunities can be identified as rather silent in the remaining responses. Merely three out of the 45 authors name *job (creation)* in subordinated clauses, whereof the BAs mainly make a link to the implementation of the CE action plan, not the PPWD revision, see for example "*Waste and resource use [...] can bring major economic benefits, contributing to innovation, growth and job creation*" (European Paper Packaging Alliance, 2020) or "*Circular economy will [...] create new jobs*" (Fachverband der Chemischen Industrie Österreichs, 2020: 1). This illustrates that this social dimension of the BAs' sustainable economic growth problematization is rather left-out and thus can be identified as silenced in this WPR study (Bacchi, 2009).

In line with the WPR approach, the analysis of both subjectification and lived effects eventually are taken under consideration in this fifth step of the analysis of the BAs' feedback on the IIA

on the revision of the PPWD. Subjectification's' basic concept revolves around the understanding that "*we become subjects of a particular kind*" (Bacchi, 2009: 16), in part through how social relationships and our position in these are constructed by the here analysed discourse on sustainable economic growth. Foucault (1982) here highlights the confrontation of different groups, which he entitles a dynamic of *dividing practices*, which in other words implies that the represented problematization of sustainable economic growth establishes an opposition among different groups of people. With regard to OQ two, its identification of the people categories of consumers and businesses can be taken as a starting point for the identification of the discursive effects of the here analysed 45 feedbacks on the PPWD revision. As such, the two people categories can be understood as different groups of people being confronted in the here analysed responses. In line with Foucault (1982), the way how both think about themselves and their surroundings is (to a small degree) influenced by the BAs' responses on the IIA.

The analysis of the associations used to discuss the consumers' role in the problem representation shows that the safety of customers is an repetitive discourse in the feedback, exemplarily in combination with that mandatory recycled content in packaging "*is safe for consumers*" (The Alliance for Beverage Cartons and the Environment, 2020: 1) or the recycling of packaging material in general, that the European Recycling Industries' Confederation (2020) argues "*[enables] good messaging to consumers*". Additionally, BAs strengthen the need of both communication and trust between producers and consumers in order to achieve the latter's acceptance for the implementation of circular packaging (Polski Związek Przemysłu Kosmetycznego, 2020; FEAD, 2020). The Extended Producer Responsibility Organisation (2020) moreover also requires consumer behaviour's shifts in the *on-the-go* products, which have a significant meaning for the means of recycling. By integrating these findings with the subjectification effects of WPR, the by the BAs provided feedback on the IIA has implications on the group of consumers, as their safety is ensured within the represented problematization. In addition to that, this group can understand itself as an essential part of the implementation of circular packaging, where they play an active role, as illustrated in the BAs responses.

On the other hand, the variation of discourses on businesses' role in the problem representation is larger. The most essential ones impacting the self-understanding of businesses in the feedback is the expectation of the BAs that the businesses will advance themselves in order to adapt to the CE action plan (i.a. FoodDrinkEurope, 2020). As the European Snacks Association (2020: 3) outlines, businesses' "*administrative burden and cost of proving compliance*" in the

implementation of the revised PPWD are significant considerations in the BAs' feedback; as well as the importance of the EU single market for the existence of the businesses. In a similar line, the European Brands Association (2020) emphasizes this social group's need for long-term investments, which is a way of underlying the importance of legal frameworks businesses can rely on. In summary, the here analysed responses thus have an impact on the group of businesses as they are expected to adjust their companies and enterprises to the CE action plan, while their administrative and economic burdens however are acknowledged. Central to the understanding of the businesses is their access to the EU internal market, as highly discussed in the BAs' feedback.

It can be observed that the previously introduced lived effects, thus the problem representation's material impact (Bacchi, 2009) have already been included in this analysis of the subjectification effects of the two opposing groups . As an example, the customers' understanding as an essential part in the implementation of the CE or the businesses' continuous access to the EU internal market can be mentioned.

To summarize, this analysis of the produced effects by the problem representation of sustainable economic growth demonstrated that the BAs on the one hand influence discursive effects, such as the exclusion of the IIA's social dimensions like employment. On the other hand, subjectification and lived effects can be identified in the responses that have a profound impact on how both consumers and businesses perceive and construct their roles in relation to the feedback.

7.6. OQ6: How/where has this representation of sustainable economic growth been produced, disseminated and defended? How could it be questioned, disrupted and replaced?

In this concluding step of the application of the WPR approach to the BAs' feedback on the IIA introducing the PPWD's revision, attention is drawn to the mechanism(s) establishing the dominant problem representation as well as to potential ways of challenging the problem representation (Bacchi, 2009).

As it has been concluded in OQ3, the sustainable economic growth problem representation was overall immensely affected by EU policy-making in general. More concrete, this involves the introduction of environmental policies in the 1970s as well as more recent legislation action

plans such as the EGD, WFD, or the SUP Directive. Additionally, the EU's economic development under the influence of the coronavirus pandemic in the early 2020s has affected the BAs' problem representation. The fact that the authors of the 45 feedbacks to this large degree react to previously introduced EU legislation thus confirms the functioning of the EU's consultation mechanism regarding BAs. In other words, the high rate of discourses and discussions revolving around other EU legislations within the field of environmental policy legitimizes the EU's OC procedure, which was introduced in order to include the broader public to its policy-making (European Commission, n.d.-d; Quittkat, 2011; Pansardi and Battegazzorre, 2018). Foucault's perspective on questioning the established relationship between the here studied discourses, their authors (BAs) and its broader audience additionally gives insights about the mechanisms establishing the sustainable economic growth problem representation (Bacchi, 2009). In terms of the understanding that the problem representation's audience primarily corresponds to the EC, the relationship between the three entities seems rather convenient and homogeneous. Consequently, the here studied discourses establishing the BAs' problem representation review (different) EU policies, undoubtedly including the IIA on the revision of the PPWD. Thus, this relation strengthens the mechanism of OC within the practice of policy-making within the EU. More, based on these findings, one can conclude that the problem representation has to a large degree been produced in the homogeneous relationship between the studied discourses, the BAs and the EC.

Eventually, this part of the WPR approach aims to identify possibilities to challenge the problem representation of sustainable economic growth, i.a. by questioning ways to replace it (Bacchi, 2009). Acknowledging the fact that discourses in fact use to be plural or even contradicting, they can be considered as resources for the process of the re-problematization of the problem representation. Reflecting on the in the problem representation silenced factors of an accurate commitment towards tackling the environmental impacts of packaging and packaging waste (OQ4), this limits the *sustainable*-part of the problem represented. Additionally, this limitation restricts the by the EC identified environmental dilemmas of packaging and packaging waste were meant to be addressed (European Commission, 2020b). Building upon this premise, the problem represented could be reconceptualized and approached differently by facilitating a more nuanced discourse and the presentation of a stronger focus on environmental sustainability in the by the BAs' studied problem representation. However, the economic considerations nevertheless also remain a crucial target of the PPWD revision, which

emphasizes the importance of factors as e.g. the functioning of the EU internal market in the feedback on the IIA, introducing the revision of the PPWD.

8. Summary of Findings and Conclusions

This study offers the analysis of stakeholders' contribution to the EU policy-making within the field of environmental policy, more precisely BAs feedback on the IIA introducing the revision of the PPWD. Guided by the RQ *How do BAs represent their interests in EU's environmental policy-making?*, the analysis follows the systematic WPR approach introduced by Bacchi (2009). Based on that, this study is conducted in six stages, the results can be summarized in the following table (Table 2).

Table 2. Summary of key findings.

Operational Question (OQ)	Results
<p>OQ1: What is the problem of environmental policy-making represented to be in the BAs' feedback on the revision of the PPWD?</p>	<p>The dominant problematization represented in the BAs' feedback revolves around enhancing sustainable economic growth.</p>
<p>OQ2: What presupposition or assumptions underlie this representation of the sustainable economic growth as a problem?</p>	<p>Three categories of presuppositions can be identified. The assumptions underlying the representation of sustainable economic growth are:</p> <ul style="list-style-type: none"> • in terms of represented binaries: challenges and opportunities; • the key concept of influence; • the personal categories of consumers and businesses.
<p>OQ3: How has this representation of the 'problem' come about?</p>	<p>The diverse developments affecting the problem representation are partly linked to EU policy-making, including</p>

	<ul style="list-style-type: none"> • the introduction of EU environmental policies since the 1970s • recent legislations: CE action plan, EGD; WFD; SUP Directive. <p>Also, the economic impacts caused by the coronavirus pandemic on the European economy affected the problem representation.</p>
OQ4: What is left unproblematic in this problem representation? Where are the silences? Can the ‘problem’ be thought about differently?	BAs do not commit themselves to urgently tackling problems related to environmental sustainability to the same degree as they commit themselves to economic growth or to an equal extent as the EC.
OQ5: What effects are produced by this representation of the problem of sustainable economic growth?	<p>The effects generated by the problem representation can be split into two:</p> <ol style="list-style-type: none"> 1) discursive effects show an exclusion of social dimensions in the feedback, such as employment 2) subjectification and lived effects produced by the feedback, in terms of how consumers and businesses’ role in the problematization
OQ6: How/where has this representation of the ‘problem’ been produced, disseminated and defended? How could it be questioned, disrupted and replaced?	<p>The problem representation has to a large degree been produced in the homogeneous relationship between the studied discourses, the BAs and the EC. More, this is an example of strengthening the OC mechanism in EU policy-making.</p> <p>The problem represented can be redefined by a more nuanced focus on environmental sustainability.</p>

The table shows that the dominant problem of environmental policy-making represented in the BAs’ feedback is sustainable economic growth, which is regulated by the presuppositions of (a), the problematization’s challenges and opportunities (binaries) for the BAs’ members; (b),

the understanding of influence as a key concept, which means that the BAs' demonstrate awareness about their right to participate in affecting EU policy-making; as well as (c) the respective roles of consumers and businesses, which are central in the sustainable economic growth problematization. Moreover, this analysis shows that previous EU legislation to a high degree influences the feedback on the PPWD, especially EU environmental policy. This means that the feedback on the PPWD also is used to criticize, comment, or compliment interrelated legislations. These findings expand the scope and application of the overall OC mechanism, because not only the revision in question is commented on but also other related EU law. Additionally, the coronavirus pandemic's consequences for the European economy had an influence on the BAs' feedback. Continuously, the feedback demonstrates that the BAs' on the one hand are curious about the transition to a CE as well as that they support the EC's aims outlined in the EGD. However, the material on the other hand provides that not (all) BAs are interested in tackling problems themselves to an equal extent as they aim to enhance the European economy. This problematization of sustainable economic growth additionally leads to the exclusion of central social dimensions of the problem represented, such as the discussion of the consequences for employment in the PPWD revision. To the contrary, the BAs' pay more attention to the role of both consumers and businesses in their problematization. Additionally, this study's data indicates that the BAs' feedback on the PPWD revision is an illustration of enhancing the OC mechanism within EU's policy-making. This is stressed by the relation between the here studied discourses, the BAs and the EC to the problem represented in the feedback. Eventually, the problem of sustainable economic growth could be reconsidered by increasing the BAs' target to environmental sustainability.

To return to this study's RQ of *How do BAs represent their interests in EU's environmental policy-making?*, the here analysed empirical data demonstrates several different outcomes. The BAs express diverse interests in the EU's environmental policy-making through different means. Nevertheless some overall occurring structures and findings can be identified. Thus, the BAs interest in EU environmental policy-making primarily revolves around communicating their economic interest, which exemplarily is expressed through the importance of the well-functioning of the EU internal market within the here studied feedback. Still, the need to tackle environmental sustainability finds a second, subordinated attention. In this manner, the here studied data shows that BAs in their feedback on the revision of the PPWD stress and acknowledge the need of the amendment to more environmentally friendly EU legislation, however they do not commit themselves to the adaptation with the same urgency as they aim

to enhance the (European) economy. Moreover, the way in which the BAs represent their feedback stresses both the legitimacy and functioning of EU's consultation mechanism, exemplarily with regard to the high participation rate of the BAs.

While the theoretical contribution of this study is minor, it extends existing knowledge on interest representation, especially OC at EU level, with a particular focus on environmental policy-making, exemplarily studied in form of BAs' participation and communication in the OC mechanism. Thus, this examination focusses on the BAs' in fact interest in enhancing environmental policy, especially regarding the EGD, which is the EU's cross-policy area strategy to become the first climate-neutral continent (European Commission, n.d.-e). The results of this study have implications for both EU policy-makers and other stakeholder groups participating in future OCs, exemplarily connected to the fact that businesses and BAs are the largest groups participating in this policy-making mechanism (European Commission, n.d.-g). As demonstrated, the BAs primarily stress the significance of the functioning of the European economy and the EU internal market, followed by the importance of tackling climate change. If the EU aims to become climate-neutral by 2050, the business sector plays a significant role for the implementation of the CE action plan and the EGD. Thus, the outcomes of this study suggest EU policy-makers to further stress the combination of economic and environmentally friendly policy (revisions) in order to involve this central business sector in the implementation.

Several limitations to this study should be noted, first concerning the here examined data. Even though the number of feedbacks from the BAs was limited due to language barriers, the analysis of the available data demonstrated a reasonable amount of overlap between the different BAs, which stresses the validity of the here discussed outcomes. Second, with regard to this study's purpose to broaden the understanding of the EU's policy-making within the field of environmental policy, it should be acknowledged that this study's method might be restricted. While the by Bacchi (2009) introduced WPR approach offers a systematic analysis of the problem represented in the BAs' feedback, not the entire complexity of the responses might have been taken into consideration. Theoretically, this study's contribution is limited as it strictly follows Bacchi's WPR approach, based on a post-structuralist epistemology. The expansion to alternative frameworks to study the feedback could have broadened the results and findings.

Finally, future research could further contribute to the academic research on environmental policy and interest representation in form of OC at EU level. Here, the examination of feedback

on additional policies and policy revisions could encourage different stakeholders' priorities, commitment to tackling climate change as well as their understanding of the EU's transition towards a climate-neutral continent until 2050, where diverse stakeholder groups have a significant impact. One example could be the study of the feedback conducted by companies/businesses on the IIA on the revision of the PPWD, as these are the second largest group participating in this OC (European Commission, n.d.-g).

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