



DEPARTMENT OF POLITICAL SCIENCE  
CENTRE FOR EUROPEAN STUDIES (CES)

# TO IMPLEMENT, OR NOT TO IMPLEMENT, THAT IS THE QUESTION

The role of non-state actors in environmental  
policy implementation in Serbia

**Marko Stankovic**

---

Master's thesis:	30 credits
Programme:	Master's Programme in European Studies
Level:	Second Cycle
Semester year:	Spring 2021
Supervisor:	Urban Strandberg
Keyword:	Europeanization, practical policy implementation, environmental policy, enlargement, SEE-countries
Word count:	17365

## **Abstract**

This thesis analyses what roles non-state actors play in practical environmental policy implementation in Serbia. European environmental policies have been particularly difficult for new EU-member states and candidate countries to adhere to over the years. With an increasingly progressive and climate ambitious EU, this poses the question of how candidate countries can adapt, and practically implement these policies.

Through the concept of Europeanization, based on rational and sociological institutionalism, this paper reflects upon how the EU and European policies affect domestic policies in Serbia, by looking at their practical implementation of environmental policies. This will be measured by focusing on what role non-state actors play in practical policy implementation, as these play a key role in EU enlargement negotiations.

Previous studies regarding Europeanization have mainly focused on legal and formal implementation of EU-laws in European countries, and/or on the Central Eastern European countries (CEE). Less attention has been given to the practical implementation of environmental policies, especially in the South East European (SEE) countries.

Using Serbia as a case study, semi-structured interviews were conducted with representatives from Serbian NGOs, the Swedish Environmental Protection Agency (EPA), the European Commission (EC) and the EU Environment Partnership Programme for Accession (EPPA).

Findings include that the non-state actor's main role have been to consult the government, to monitor the development of the EU-accession negotiations and to raise public debate. Although not a small role in itself, the potential role based on the opportunities that EU-enlargement presents is not as large as might be expected in other contexts. As an example, the lacking capacity of the Serbian government could be complemented by the competence of non-state actors as has been seen in other CEE countries.

# Contents

1. Introduction .....	3
1.2. Research Aim .....	4
1.3. Research Question .....	4
2. Theory and previous research .....	6
2. 1. Europeanization .....	6
2. 2. Previous Research.....	11
2.3 Formal implementation .....	14
2.4 Practical implementation .....	15
3. Method and material.....	17
3.1 Method.....	17
3.1.1 Case selection – Serbia .....	17
3.1.2 Expert interviews .....	18
3.1.3 Structure of the interviews .....	20
3.2 Empirical Material .....	23
3.2.1 Screening report for chapter 27.....	23
3.2.1 Limitations.....	24
4. Results .....	25
4.1 The European Enlargement process – Chapter 27.....	25
4.2 Setting the scene – Main obstacles for practical policy implementation in Serbia of European environmental policy and state of non-state actors involvement .....	26
4.3 Misfit between EU environmental policy and Serbia’s environmental policy.....	28
4.4 Changes in decision-making authority and legal enforcement.....	31
4.5 Capacity of domestic actors.....	33
4.6 Multiple veto points.....	36
4.7 Cooperation with supportive formal institutions .....	38
4.8 Collective understandings.....	43
4.9 Norm entrepreneurs .....	46
4.10 Cooperation with informal institutions .....	48
5. Conclusion.....	50
6. Discussion and further research .....	52
References .....	56
Appendix .....	60
Appendix 2 – Questionnaire in English.....	62
Appendix 3 – Questionnaire in Swedish .....	63

Appendix 4 – Questionnaire in Serbian.....	64
Appendix 5 – Letter request for interviews .....	65

# 1. Introduction

Since the beginning of the 21<sup>st</sup> century, the EU has increasingly defined and prided itself on being an environmental leader in the world. With varying results over the years, it has tried to take up a global leadership role, by promoting and championing a sustainable future. In the last few years, we have seen the introduction of the Green New Deal, the increase in vote share of green parties across the continent, and transnational networks increased visibility in the public debate. Moreover, the EU has sought to transfer these values through trade agreements and development aid to and with foreign countries. This has however, perhaps most clearly been seen in the EU's position in enlargement negotiations.

The process of how EU-policies and the EU itself, influences member states, trading- and partner countries, as well as accession countries, has been described by scholars as a process of Europeanization. This notion of how Europeanization was affecting domestic policies, and fear of non-implementation of EU-policies, arose particularly in relation to the large 2004 enlargement, when ten Central Eastern European (CEE) countries joined the EU. These countries were characterized with weak state, and non-state actors, fuelling fear that these states do not have the capacity to implement the costly and difficult EU environmental acquis. Therefore, non-state actors have been particularly highlighted both by the EU, and researchers, as important for policy implementation. Explaining why a lot of focus from the EU in the years that followed have sought to strengthen the capacities of these countries.

Because of the positive effects of EU-membership, such as visa liberalization and access to the common market among other things, Europeanization scholars have argued that the EU-conditionality<sup>1</sup> will act as a motivator for the candidate countries to live up to the EU requirements, even though they are costly and difficult to implement. In the post-accession period of the CEE countries researchers were concerned with the EU policy implementation, which often has been measured in formal implementation, and looked at for example by the number of infringement cases each country faces. Contrary to the expectations beforehand, research has shown oftentimes that the CEE countries have below average number of

---

<sup>1</sup> EU-conditionality will be explained more in depth later, but is simply put that the EU has final say in what countries can join the Union, giving them asymmetric power over the candidate countries.

infringement cases. Suggesting that these countries formally implement these policies as good as older member states.

One of the main criticisms of formal implementation studies have been that this does not measure implementation in practice, meaning if these countries practically implement these policies, and not only on paper. Further, most studies have been focusing solely on the CEE countries. This paper will therefore focus on the next group of countries in line for EU-membership, namely the countries in South East Europe (SEE). As a case study, Serbia will be of focus for this thesis, and more specifically the role of non-state actors in practical policy implementation. Non-state actors in this case entails civil society, and includes formal NGO's, informal organizations, individuals, transnational networks, labour unions and scientists. The private sector such as companies and investors are of interest as well, but are not of main interest for this study.

## 1.2. Research Aim

The research aim of this thesis is to analyse what roles non-state actors plays in practical environmental policy implementation in Serbia, which is a South East European (SEE) country. By analysing this, the paper will also contribute to the discussion on how Europeanization contributes to the greening of domestic policies.

## 1.3. Research Question

The overarching research question is thus:

*What role does non-state actors play in European policy implementation?*

To help guide the thesis, two specified research questions have been formulated to suit the scope and aim of this thesis:

- *How do non-state actors in Serbia participate in the implementation process related to environmental policies?*
- *Have non-state actors in Serbia received any formal decision-making authority in the environmental policy implementation process?*

Here, a broader definition of non-state actors is taken, which entails civil society as a whole, and includes formal NGO's, informal organizations, individuals, transnational networks, labour unions, and scientists. Furthermore, the question focuses on what role they play in European policy implementation, as well as in the Europeanization process. Since, non-state actors are part of the EU's recommendations for EU-enlargement, they are believed to have a large part in practical policy implementation. The private sector such as companies and investors are of interest as well, but are not of main interest for this study.

Serbia is specified in the second research question as it is relevant to study as one of the candidate countries negotiating with the EU today. Further, it is part of the SEE countries, which geographically have not been studied to the same extent as the CEE countries. There are different ways non-state actors can participate in the implementation process. Looking at other countries, non-state actors have been utilized in a capacity strengthening role, meaning that they have complemented the state in those administrative, and knowledge gaps that exist. In other cases non-state actors have been used to consult state actors, to raise awareness, part take in the public debate or to receive a formal decision-making role. To further specify the second research question, the third research question asks specifically if non-state actors have received formal decision-making authority.

Implementation process differentiates between formal and practical implementation, where formal implementation refers to the transposition of EU-law into national law. Practical implementation refers to the implementation of that law into practice, which is of interest of this thesis. Environmental policies are regarded as the most technically difficult, expensive and demanding policy areas in the EU, especially for candidate countries. It is therefore a central policy area for new candidate countries to put a lot of effort into. Further, it has become one of the core areas of the EU, making it relevant to study.

## 2. Theory and previous research

The theoretical perspective used in this thesis will mainly be departing from the Europeanization perspective that is based on rational- and sociological institutionalism, to analyse the driving force behind EU integration, and what role this gives to non-state actors (Bache et al, 2011). As will be shown below, Europeanization states that EU policies will affect domestic policies. Since the EU emphasizes the role of non-state actors for successful policy implementation, one would expect them to play an active role in practical policy implementation. Europeanization has been analysed from several different perspectives, which will be further elaborated in the upcoming sections. In terms of implementation, it has mainly been used to analyse formal implementation, focusing on the transposition of EU-law in national legislation. However, solely incorporating EU legislation into national legislation does not entail a great deal if not sufficiently implemented, no matter how good the policy is. Practical implementation has been argued to be the real indicator of a country's adaptation to European policies and therefore, this thesis will focus on the practical implementation of European environmental policy.

### 2. 1. Europeanization

Emerging in the 1990s as a theoretical perspective, Europeanization scholars have aimed to describe the impact the European Union has on nation states. Adopting a "top down" perspective, Europeanization has sought to describe the EU's power to influence, and shape countries' domestic policies and social processes. While not being a theory on its own, Europeanization scholars have been drawing its theoretical framework from mid-range theories and concepts. Two dominating strands of attempting to theorize Europeanization have been theoretically grounded in rationalist and sociological institutionalism which have been outlined by Börzel and Risse (2000, 2003). This definition of Europeanization can be described as "[...] the process of influence deriving from European decisions and impacting member states' policies and political and administrative structures" (Heritier et al., 2001). This influence defined by Heritier can however be extended to both candidate countries and negotiating



partners. As will be discussed below, this influence is increasing if and when EU-conditionality applies.

In broad terms, Europeanization is argued by some to occur when there is some sort of “misfit” or in-compatibility between European-level processes, policies and institutions, in relation to the domestic-level processes, policies and institutions. In this sense, Europeanization is somewhat “inconvenient”, as it differs from the domestic way of doing things. This degree of fit or misfit constitutes adaptation pressures, which is argued to be necessary but not enough on its own for expecting change. Misfit between European and national policies is the first condition for Europeanization to occur. The second condition is that there is some facilitating factor, such as actors or institutions responding to the adaptation pressures (Börzel & Risse, 2000). One example of facilitating factors are formal NGOs, agencies and individuals through for example demonstrations or local engagement initiatives.

From a rational institutionalist perspective following the “logic of consequentialism”, the misfit between European and domestic processes, policies and institutions provides societal and/or political actors with new opportunities and constraints in the pursuance of their interests. More specifically, European policies and institutions add new opportunities and constraints that redistribute material (decision-making authority, legal enforcement) and cognitive (benchmarking, legitimacy) power resources of domestic actors to achieve policy change. Europeanization can therefore trigger domestic change through differential empowerment of actors based on their interests and cost-benefit calculations (Sotirov et al. 2015). Even where such new opportunities or constraints develops, this misfit still provide adaptation pressures on the country seeking deepened EU-integration.

Furthermore, governments might either directly calculate costs and benefits arising from EU demands, or more indirectly react to pressures from domestic groups affected by domestic adjustments and/or EU rewards. The pressure of EU adjustment empowers those domestic actors that expect benefits from such changes (Sedelmeier, 2012). These costs and benefits exist in different forms, and could entail for example economic, social, political, or administrative costs, all influencing domestic actors’ behaviours.

Whether the pressure of EU adjustment leads to a domestic redistribution of power, is argued to depend on the capacity of actors to exploit these opportunities and avoid the constraints. Two mediating factors with opposite effects influence these capacities. Firstly, the existence of multiple veto points in a country's institutional structure can effectively empower actors with diverse interests to avoid constraints leading to increased resistance to change. Second, existing formal institutions might provide actors with material and ideational resources to exploit new opportunities leading to an increased likelihood of change. Examples of such supportive formal institutions could be the European Commission (EC), or the European Bank for Reconstruction and Development (EBRD).

An example of adaptation pressure from the EU is during accession negotiations, where the EC uses its power of *acquis* conditionality to request domestic policy and institutional changes to comply with EU rules (Schimmelfennig and Sedelmeier, 2004). EU-enlargement has been concretized in the EU *acquis* communautaire, that each new member state should live up to, in order to join the union. Ever since the enlargement in 1981, the environmental *acquis* has repeatedly been the most difficult, and technical *acquis* each new member state must implement (Eliantonio, 2018). The EC relies on sanctions (e.g., postponing memberships) or 'rewards' (e.g., financial assistance or membership) to make sure states fulfil one or more of the conditions laid out in the EU *acquis* communautaire (e.g., policy adjustments or institutional change) (Schimmelfennig and Sedelmeier, 2008, 2019). This asymmetrical power relationship gives EU and central governments officials an advantage over other actors (Börzel, 2011). After accession, the conditionality-based structure of incentives and sanctions fades away, increasing the likelihood of non-compliance with EU-rules (Epstein & Sedelmeier, 2008).

From the rational institutionalism perspective, drawing on the transaction cost, it can be assumed that governments and state actors with depleted capacity may thus be more inclined to engage non-state actors because of the additional value (knowledge, expertise) they can bring to the implementation of EU environmental policies (Börzel & Fagan, 2015).

Summarizing rational institutionalism then, it is argued that the misfit between EU and domestic policies will lead to adaptation pressures for aligning domestic policies with EU policies to be able to join the Union. This leads to new opportunities and constraints for the domestic actors

to both impact, but also be empowered by this process. But, to be able to exploit these new opportunities and constraints, these actors need to have the capacity to do so. Furthermore, coupled with capacity is also the number of veto points in the country, to oppose these changes, and also the existence of supportive formal institutions.

Looking however at the sociological institutionalist perspective, it places emphasis on a “logic of appropriateness”, and processes of persuasion. European policies, norms and the collective understandings attached to them exert adaptation pressures on domestic-level processes because they do not resonate well with domestic norms, and collective understandings. This is argued to happen firstly, through “change agents” or norm entrepreneurs that mobilize in the domestic context and persuade others to redefine their interests and identities. These change agents or norm entrepreneurs are according to the sociological institutionalism, front runners in advocating for European policies in these countries. Norm entrepreneurs could for example be formal NGO’s, scientists, environmentalists or the general public. Secondly, through a political culture and other informal institutions that exist which are conducive to consensus-building and cost-sharing (Börzel & Risse, 2000). These actors use scientific knowledge, exchange of experience, media campaigns and persuasive moral arguments to demand, or restrict policy change. Agents of change can be empowered by normative legitimacy to influence government, public opinion and their policy opponents (Sotirov et al, 2015). Coupled with the supportive informal institutions mentioned above, this path can lead to domestic policy change through the internalization of new norms and redefinition of actors’ interests and identities.

Sociological institutionalism then suggests that Europeanization leads to domestic change through a socialization and collective learning process resulting in norm internalization and the development of new identities. The more active these norm entrepreneurs are and the more they succeed in making EU policies resonate with domestic norms and beliefs, the more successful they will be in bringing about domestic change. Moreover, collective understandings of appropriate behaviour strongly influence the ways in which domestic actors download EU requirements (Börzel, 2011).

Further, sociological institutionalism understands change as occurring through the diffusion of ideas and knowledge transfer as a result of twinning processes and the development of transnational networks (Fagan & Sircar, 2015).

Summarizing sociological institutionalism then, Europeanization is understood as the emergence of new rules, norms, practices, and structures of meaning to which member states are exposed and which they have to incorporate into their domestic practices and structures (Börzel & Risse, 2003). These new rules, norms and practices are facilitated by norm entrepreneurs who see it in their interest to adopt European environmental policies in their countries. Norm entrepreneurs could be non-state actors promoting environmental protection policies or concerned public. Lastly, these domestic actors could be strengthened and supported through transnational networks with a similar agenda.

**Figure 1.** Figure 1 has been taken from Börzel & Risse (2003) and serves as an illustration of the process of Europeanization of rational institutionalism (left), and sociological institutionalism (right). Further, the different “steps” have been the foundation for the thematic coding of the interviews (Appendix 1), and for the structure of the headings in the results section (chapter four), in this thesis.

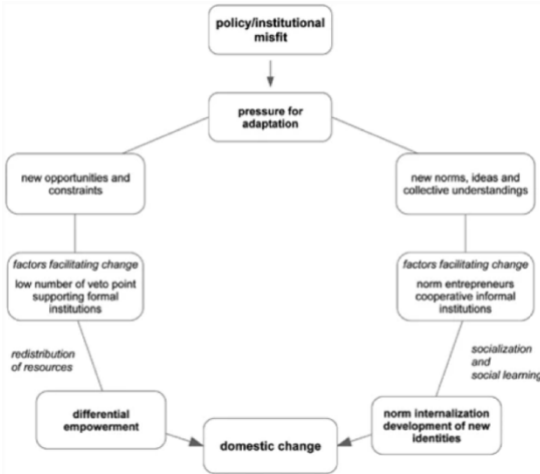


Figure 1 (Börzel & Risse, 2003)

While adjustments to EU demands and rules usually generate domestic costs—otherwise they would have been adopted without EU pressures—they can also entail intrinsic benefits for

governments. In such cases governments might have been too weak to carry out their preferred domestic changes without the additional legitimacy, pressures, or benefits generated at the international level. Member-state governments try to shape EU policies not only to reduce domestic adjustment pressures, but sometimes also to engineer precisely such domestic adjustment pressures. Likewise, non-member states' governments might pursue EU membership as a strategy to replace domestic rules and lock in such changes (Sedelmeier, 2013).

Although differing, the rational and sociological institutionalism are not mutually exclusive. They often occur simultaneously or characterize different phases in a process of adaptation change. As the interest of this thesis is to analyse the role of non-state actors, the most appropriate perspective to focus on is to combine both these perspectives, as it offers a more nuanced and richer analysis of the empowerment of different actors in the Europeanization process.

The rationalist- and sociological institutionalist perspective provides a theoretical framework for analysing the motivations from both the state actors, and non-state actors such as NGOs and transnational networks. Further, the Europeanization perspective is interesting since it is an established concept, while at the same time being an ongoing development and a continuous process.

## 2. 2. Previous Research

With Europeanization being a very broad concept, the previous research has tapped into several different aspects of the European integration.

In the beginning of the 2000s, scholars such as Börzel and Risse (2000) and (2003), emphasized the need for a “misfit” between the EU policies and the domestic policies. This misfit would lead to adaptation pressures from the EU and force the member states to adapt their policies domestically. They argued that this misfit was necessary, but however not sufficient for change.

There needs to be some sort of agency developing this change. Evident however, was the strong “top-down” focus in the relationship between the EU and especially new member states.

This was further exemplified by Schimmelfennig and Sedelemeir (2004), who placed emphasis on EU-conditionality as the main factor driving the impact of Europeanization on domestic policy. Mainly concerned with the CEE countries, they showed that the asymmetrical power the EU had over the ten candidate countries in their EU accession negotiations. They argued that as the EU conditionality disappeared after accession, EU's power, and the willingness to adhere to EU laws and directives, would disappear.

However, Europeanization has been shown to still be able to trigger post-accession change in policymaking and compliance. EU policies and institutions offer opportunities for transnational non-state actors to circumvent governments to influence policies on the national level (Sotirov et al, 2015). Strategic use of multiple levels of governance is not only of benefit for the EC, that lacks direct enforcement capacities but is also of great advantage for non-state actors who perceive a weak position in defending their interests at home. Through transnational networks, domestic NGOs have been able to circumvent domestic state governments, and gain knowledge, resources, and motivation to participate in the public debate. Further, local NGOs have through these networks been able to mobilize the Commission and other EU-actors, to put pressure on the domestic countries to promote their agenda (Andanova & Tuta, 2014). The “pull” from a domestic mobilization of non-state actors is often followed by a “push” from above by supranational institutions. The EC and the European Court of Justice (ECJ) can resort to coercive instruments (e.g. infringement proceedings) to enforce policy changes. Faced with substantial political and financial costs, state authorities can be forced to adhere to EU rules (Börzel, 2003).

In the post-accession of the CEE countries, some Europeanization scholars have been concerned with the capacity of state- and non-state actors to implement these EU-rules. This was particularly evident in the post-accession period after the extensive enlargement of CEE countries in 2004 and 2007. These post-socialist countries have been argued to have weaker state, and non-state actors, compared to older member states. This has led to the coining of

“double weaknesses” in these new member states, which severely hinders these states of fulfilling the EU requirements and EU politics (Börzel, 2009).

The European Commission have therefore strongly encouraged candidate countries to involve non-state actors in the adoption of and adaptation to the *acquis* to ensure both greater effectiveness and legitimacy of the Europeanization process (Börzel & Fagan, 2015). But also to counter the capacity gap that often exist in these countries. Public participation related to environmental protection is as well included in the EU *acquis* and in the Aarhus Convention (European Commission, n.d.).

It is however difficult to investigate how well civil society is included in the adoption and implementation of the *acquis*. Commonly, research differentiates between formal and practical implementation. Formal implementation is easier to measure since it is easier to quantify. Practical implementation is not possible to quantify to the same extent, which calls for a qualitative approach.

A dominating research strand of Europeanization has therefore focused on formal compliance, measured by number of infringement proceedings (Börzel & Buzogany, 2019). Contrary to the belief that the countries with weak state, and non-state actors, such as the newest member states, has shown to have below average, or average levels of infringement cases compared to the rest of the Union. However, formal compliance is believed to only partially tell the picture, and does not say if these countries implement these policies in practice (Börzel & Buzogany, 2019).

Wunsch (2015) have looked at the EU’s new approach to Western Balkans candidate countries by looking at the increased emphasis on the involvement of non-state actors in the adoption of the *acquis communautaire*. Findings include that the importance of civil society involvement in accession negotiations has moved up on the EU’s agenda in recent years. Furthermore, the study examines what has worked to mobilize NGO monitoring coalitions in Croatia, Serbia and Montenegro. And, concludes that EU external incentives have not been the leading mobilizer of local NGOs. Her research has however only focused on chapter 23, which is related to rule of law. Wunsch further states, that it is important to differentiate between the various chapters, as the context between them can vary a lot (Wunsch, 2015).

Further, in post-communist countries, previous research have called for the need to contextualize the impact of the EU strategy and bring in more prominently domestic factors as the key to explaining successful rule transfers in the post-communist space. Therefore, the ‘domestic turn’ in Europeanization research has encouraged deeper introspection into the conditions that facilitate the role of the EU in various national settings (Elbasani et al, 2013).

Alternative strands of research, usually grounded in comparative politics and post-communist area studies, are more sceptical when viewing the EU strategy and its influence on post-communist transitions. Critics of the EU, and to other external factors more generally, share the concern that it is important not to overestimate the EU influence (Grabbe, 2003).

To conclude, previous research has mainly focused on CEE, and on formal implementation. Furthermore, the studies concerning practical implementation have neither focused on the SEE countries, nor on chapter 27. Meaning, that there exists a research gap to understand what role non-state actors plays in European practical policy implementation, and in terms of geographical focus. This paper therefore seeks out to examine non-state actor’s role in practical implementation in South Eastern Europe (SEE), using Serbia as a case study.

### **2.3 Formal implementation**

Formal implementation/compliance refers to whether EU policies are fully and correctly transposed into national laws, conflicting domestic laws are repelled and administrative procedures are in place to ensure practical application (Börzel & Fagan, 2015).

As stated previously, research has mainly focused on formal implementation. Countries with weaker state and non-state actors have been thought to not formally comply with policies to the same extent as older member states with stronger state, and non-state actors. This has for example been studied by looking at the number of infringement cases to the European Court of Justice or to the European Commission. It has shown that oftentimes the newer member states



have average, and sometimes below average, number of infringement cases, suggesting that weak state, and non-state actors do not play an important role in formal implementation.

Looking at quantitative measures, such as the number of infringement cases, have however been criticised for not taking the whole picture into account. Firstly, it has been argued that the infringement cases are just the top of the iceberg, meaning that most of the violations do not become infringements, or reported (Börzel & Buzogány, 2019). Secondly, there has been concern that infringement cases can not capture whether these policies are implemented in practice. Different notions of implementation generate different results; a directive can be perfectly transposed into national legislation, but this does not necessarily lead to practical implementation as well (Versluis, 2007). Furthermore, Zheyazkova and Thomann suggests that although legal compliance tends to reduce practical compliance problems, their results indicate that EU rules do not directly translate into implementation practices. Thus, in contrast to some previous research, they conclude that literal implementation is not always the best form to ensure practical implementation (Zhelyazkova & Thomann, 2021). Further highlighting that studies related to practical implementation is needed.

## **2.4 Practical implementation**

Practical implementation refers to which extent legally adopted EU policies are put into practice. Meaning, if rule targets bring behaviour in line with rule requirements and state actors monitor compliance with rule targets and impose sanctions in cases of violation. Practical implementation is therefore a demanding and costly process for applicant states. It relates to both new rules and a new way of making those rules. In contrast to legal compliance and formal implementation, practical implementation refers to the process where rules are enforced and applied by the relevant administrative actors and target groups. Simply put, not by intentions "on paper", but through activities "in action" (Zhelyazkova & Thomann, 2021).

Compared to formal implementation, practical implementation is less researched. However, the ones who have studied practical implementation has mainly concentrated on the CEE countries. To summarize, studies regarding CEE countries show that transnational networks have shown to effectively affect the domestic environmental policies in both Rumania and

Bulgaria (Andonova & Tutu, 2014). And that domestic veto players mobilized against the application and enforcement of formally adopted EU environmental policies and directives, causing problems during the practical implementation (Börzel & Fagan, 2015).

Considering the differences between formal and practical implementation, and the research gap between CEE and SEE countries, calls for further examination of practical implementation in this area.

## **3. Method and material**

### **3.1 Method**

In this section, the chosen methodology will be reflected upon, as well as a reasoning behind the case selection, and finally a discussion of the empirical material used in the thesis. The empirical material consisted mainly of semi-structured interviews, while the European Commission's Screening Report from 2011, and subsequently, yearly published progress reports, were used for gathering background information and setting the scene for the thesis.

#### **3.1.1 Case selection – Serbia**

As SEE countries were of interest for this thesis, this area marked out the geographical scope of the case selection. As a departure point for the thesis, and in its initial phases, the geographical scope was set out to include two candidate countries, Serbia and Montenegro, as well as two EU member states, Bulgaria and Croatia, giving it a total of four case selections. These countries were of interest as they are all geographically located in the SEE area. After a while it became evident that four countries would extend the limits of this thesis, or would have resulted in less in-depth analysis of each country. This, coupled with the sole response from potential interviewees who mainly operate in Serbia, heavily impacted the data available for the thesis. Hence, the empirical selection was as well influenced by the availability of the empirical data, which is as well an important consideration when selecting cases (Yin, 2014, p.158). The primary interest for this thesis was non-state actors' influence on domestic policies in non-EU countries, and EU's power relations with candidate countries, as it is expected to be the highest when EU-conditionality is in play (Schimmelfenning & Sedelmeier 2004). Due to this, combined with the differences in availability of data, Bulgaria and Croatia were discarded.

Moreover, Serbia serves as a good example as it is one of the two candidate countries that has come the furthest in its EU-negotiations, with the other being Montenegro. Compared to older EU member states, Serbia could be argued to have lower capacities and weaker state- and non-state actors due to its post-socialist legacy. However, compared with other non-EU members in the region, Serbia shares a lot of characteristics with its neighbouring countries within the

region. As an example, Serbia and Bosnia are heavily impacted by its industrial plants, resulting in one of the worst air qualities in Europe. However, due to its size and economy, Serbia is expected to perform the best in terms of capacity of the candidate countries in the region. Despite this, Serbia is still progressing slowly in its EU-accession negotiations. This makes Serbia an interesting case study, and coupled with above mentioned aspects, the reason why Serbia was solely chosen as a case study in this thesis, over other candidate countries in the region.

The exclusive focus on Serbia, does however limit the thesis ability to generalize its findings. By not including other countries in the area, the opportunity to do cross-country comparisons became hindered. On the other hand, more interviewees focusing solely on Serbia, enabled the inclusion of more perspectives that would have not been possible with using several countries as case studies. Described more in detail below, experts in this thesis ranged from external actors such as the European Commission (EC), The EU Environment Partnership Programme for Accession (EPPA), and the Swedish Environmental Protection Agency (Naturvårdsverket). But as well internal actors such as non-state actors like Center for Ecology and Sustainable Development (CEKOR), Renewables and Environmental Regulatory Institute (RERI) and Environmental Ambassadors for Sustainable Development (EASD). And lastly internal state actors, namely one of two main negotiators representing Serbia for chapter 27 in the EU-negotiations.

### **3.1.2 Expert interviews**

As mentioned above, the aim of this thesis is to exemplify what role non-state actors and transnational organizations play in European policy implementation in Serbia. Further, how Europeanization contributes to greening of domestic policies. The aim is not to generalize the results but rather highlight one case-study. Since the main goal is to highlight perspectives and provide in-depth knowledge of the case, this demands a qualitative approach, which would allow for more detailed data. Therefore, the methodological approach used in this paper was qualitative semi-structured interviews. More specifically expert interviews, with professionals engaged in these questions directly. The interviewees were selected based on their expertise, which means that they will not be randomly selected. Although there exists a debate in political science about what constitutes ‘expert knowledge’ and how it is defined, this will not be further

discussed in this thesis. Instead, there are some key issues on which most authors agree, which are that individuals are ‘considered knowledgeable of a particular subject and are identified by virtue of their specific knowledge, their community position, or their status’ (Döringer, 2021). Based on this description in this thesis, professionals engaged in policy implementation, and with both state, and non-state actors in Serbia and the region were chosen. This has enabled a wide selection of state, non-state, governmental agencies, donors, internal- and external actors, to be suitable as potential interviewees.

The quality of the interviews depends largely on choosing the right informants. Therefore, informants are not selected through random sampling but were selected upon certain criteria (Kumar, 1986). Firstly, their first-hand extensive knowledge and insights of dealing with both non-state- and state actors in Serbia; secondly, their centrality; the degree to which they can play a central role in the process of both European integration, environmental policy implementation and cooperation between state and non-state actors; thirdly, they are considered representatives from certain groups: EC, EPPA, and Swedish EPA, to perceive the European view, and representatives of the national negotiating team of chapter 27 from Serbia to the EU to perceive the national government’s views, and thirdly non-state actors’ views on European environmental policy implementation, and last but not least, their willingness to participate.

The interviewees were professionals from the EC, EPPA, Swedish EPA, negotiators for Serbia and chapter 27, as well as three NGOs in Serbia, all of which will be further elaborated on in the upcoming sections. Experts from the Serbian government were considered but were not available for an interview. Of particular interest was Serbia’s Ministry of Environment, and The Office for Cooperation with Civil Society. Other organizations that were considered, but eventually not contacted due to space- and time limitations were employees at the European Environmental Bureau (EEB), Organisation for Economic Cooperation and Development (OECD), European Investment Bank (EIB) and consultancy firms such as Ernst and Young. Furthermore, the Swedish Environmental Protection Agency (Naturvårdsverket), are one of the agencies supporting Serbia in their environmental capacity building and was therefore an agency that was contacted, and that was interviewed as well.

Initially the aim was to have semi-structured interviews with approximately eight interviewees, which became six interviewees in the end after an expert from the European Environmental

Bureau (EEB) and one of the negotiators for chapter 27 for Serbia did not have the possibility to go through with the interview, although initially agreeing to it. Since the range and scope of the backgrounds of the interviewees were deemed sufficient, and within the time and space limit, no further interviewees were contacted.

### **3.1.3 Structure of the interviews**

The interviews were based upon a thematic scheme (Appendix 1), which was derived from rational and sociological institutionalism. Based on the theory, a number of questions were formulated and adapted to the interviewees (Appendix 2). The character of the interviews was semi-structured, meaning that the interviewees were given room to expand on their answers, and follow-up questions were posed specifically for certain interviews. This enabled a more relaxed environment, while still having a somewhat structured setting (Brinkmann & Kvale, 2015).

The questions were phrased to get the experts' perceptions on what role non-state actors have in policy implementation, in the state's capacities as regards to environmental policy implementation and the interaction with external actors.

When asking interviewees about facts, and perceive them as fact providers, they tend to be scared off, or afraid of giving "the wrong answer". By clearly stating in the interview request, and during the interview, that the interviewees perception and expert analysis is of interest, it creates a more relaxed environment, with less pressure. Since experiences and views in general cannot be wrong, it becomes easier to obtain good validity in respondent interviews in comparison to informant interviews (Esaïsson et al, 2017, p.236). Therefore, the questions were phrased to get the experts' perceptions on what role non-state actors have in policy implementation, in the state's capacities as regards to environmental policy implementation and the interaction with external actors.

Each interview lasted between 37 – 55 minutes and was initially started by asking the respondent on what language they wished to conduct the interview on. As the author is fluent both in Swedish, English and Serbian, it opened up possibilities to conduct interviews in most of the respondents' mother tongues. Translating interview questions from one language to

another does bring with it some translation difficulties, especially in obtaining the same precision in the question. Described by some as being “lost in translation” (Van Nes et al, 2010). The authors extensive knowledge of the languages, as well as opportunity to consult with native speakers helped decrease the risk of such influences. Moreover, it was determined that the advantages of letting the interviewees answer the question in their mother tongue opened up possibilities for richer, and more nuanced answers to the questions, as peoples’ vocabulary is generally more developed in their first language (Cortazzi et al, 2011). Therefore, the benefits of having interviews on three languages greatly outweighed the potential disadvantages. Translations to all interview questions could be found in Appendix 3 and Appendix 4. Most interviewees were either Swedish, Serbian or had English as their working language.

- Interviewee A: Employee at the Swedish Environmental Protection Agency (EPA), with 20 years of working experience at the EPA. Interview conducted online through Zoom. Length of interview 45 minutes. Interview conducted in Swedish on 11/03/2021.
- Interviewee B: Employee at DG Environment at the European Commission (EC) with several years of experience. Prior chief negotiator for Romania in their accession negotiations. Interview conducted online through Zoom. Length of interview 42 minutes. Interview conducted in English on 15/03/2021.
- Interviewee C: Employee at Center for Ecology and Sustainable Development (CEKOR), with 20 years of experience. Interview conducted online through Zoom. Length of interview 51 minutes. Interview conducted in Serbian on 16/03/2021.
- Interviewee D: Employee at Renewables and Environmental Regulatory Institute (RERI), with several years of experience. Interview conducted online through Zoom. Length of interview 37 minutes. Interview conducted in Serbian on 19/03/2021.
- Interviewee E: Part of the negotiating team of Serbia for chapter 27. Prior Serbian environmental minister and retired university professor. Interview conducted online through Zoom. Length of interview 45 minutes. Interview conducted in Serbian on 22/03/2021.
- Interviewee F: Employee at the Environmental Assistance Partnership Programme (EPPA), with 20 years of experience. Prior director of the Regional Environmental Centre (REC), in Budapest. Interview conducted online through Zoom. Length of interview 55 minutes. Interview conducted in English on 24/03/2021.

The three interviewees from Serbian non-state actors represent the Serbian non-state actors. These particular NGO's and the interviewees were chosen due to their centrality in the Serbian civil society. CEKOR was founded in 1997, being one of the oldest Serbian environmental NGO's, meaning that they have been following this development for a long time. The interviewee herself have 20 years of experience in this field, making her a knowledgeable interviewee, hence why we can assume that she will provide insightful answers. The interviewee from the Serbian NGO RERI, has several years of working experience in the field, and as a founder of the NGO he is assumed to have a central role in the Serbian civil society. As RERI focuses more on the legal aspects of environmental policy, he provides a slightly different perspective. Interviewee E that is part of the negotiating team of Serbia for chapter 27 has also worked for Serbian NGO's for several years. She has extensive knowledge of civil society and the environmental sector. Further, she has 20 years of experience in this field. Why we can assume that she has extended knowledge and can provide insightful answers. Due to the influential role of these interviewees and the organizations they represent we can assume that they have provided a representative perspective from the Serbian non-state actors. As the situation for non-state actors in Serbia is roughly similar to all non-state actors working for the environment, we can expect the interviewees to be able to present a representative perspective.

The interviewee from Swedish EPA, from the European Commission and from EPPA all provide expert knowledge about the situation in Serbia when it comes to implementation of environmental policy. They all three are in constant contact with both non-state and state actors and therefore have central connections to this area. They represent external actors, and their support to Serbia and Serbian state and non-state actors. All of them have extended work experience and due to their centrality in working with these questions and these actors we can assume that they will provide insightful answers. Due to their expertise, their role, and their organisations, we can assume that they have provided a representative perspective for the European supportive international institutions.

To contrast their answers and check how well this corresponds with reality, EU-reports will be presented below as well.



## 3.2 Empirical Material

The empirical material presented in the results section below was mainly based on the conducted interviews described above. The answers from the interviewees was then complemented by researching each organizations' website, where information about their work, guidelines and analyses in general was public.

The interviews were complemented by consulting the screening report the European Commission published in 2011 when Serbia officially applied for opening the EU-accession negotiations. The screening report will be described in the section below. Besides the screening report, information was taken from the European Commission's website, where annual progress reports of each candidate country are published, and so even for Serbia. These progress reports describe the candidate country's development as relates to adhering to the EU acquis, as well as previous recommendations from the EC. These progress reports are made in consultation with national NGOs operating in the country, which further makes it of interest for the thesis.

Further, in the process of opening accession negotiations, the EC presents a wide range of questions to the candidate country, that is divided on the 35 chapters that the acquis consist of. These questionnaires are made to partly determine the candidate country capacity to answer, and then to start negotiations. These questions, made public, have served as a first inspiration for the development of the interview questions in this thesis as well. These documents were used for identifying which aspects the EU highlights, and what weaknesses the candidate country has.

### 3.2.1 Screening report for chapter 27

The EU accession negotiations were officially opened between Serbia and the EU on 1st of January in 2014. Before any of the 35 chapters of the EU acquis are opened, the European Commission performs a screening process, developed to determine a country's capacity to implement EU legislation and directives, as well as identifying potential weaknesses in the country's governance.

In the screening report for Serbia regarding chapter 27, further institutional development and capacity building, staffing, training, financing as well as technical assistance was deemed necessary for the implementation of the acquis covered by the chapter (European Commission, 2014). When analysing the screening report, it became evident that the biggest challenges for Serbia laid in capacity, and cost-related constraints, as this chapter is knowledge, and investment intensive. This was further highlighted in the screening report, were compliance with this chapter requires significant investments and a structured cooperation among all stakeholders including local authorities, industry and civil society (ibid, 2014).

In the screening report, it was already highlighted that more should be done to allow for a meaningful involvement of civil society in both the accession and legislative process (ibid, 2014).

### 3.2.1 Limitations

As mentioned above, due to allocated time and space this thesis focused only on Serbia as a case study and not several countries. Although it would have been interesting to do cross-country comparisons between candidate countries and member states, due to time, availability of experts and empirical focus a more in-depth study of a single country was chosen.

In February 2020, the European Commission proposed a new enlargement methodology, changing the structure of enlargement negotiations for forthcoming candidate countries (COM, 2020a). While it has offered already negotiating candidate countries to start negotiating in the context of the new methodology, it has also allowed negotiations to take place within the old methodology. While changing methodology could potentially impact the role of non-state actors and the development of the negotiations, it is still relatively unclear which path Serbia will take. This thesis will therefore not dissect the implications of the difference between the old or new methodology, and what implications it potentially could have.

## 4. Results

As previously discussed, Europeanization have been analysed from several different perspectives. In terms of implementation, it has mainly been used for formal implementation, focusing on the transposition of EU-law in national legislation. However, good policy does not mean that much if it is not implemented in a sufficient way. Practical implementation has been argued to be the real indicator of a country's adaptation to European policies and as has been stated before, this thesis will focus on the practical implementation of European environmental policy.

Revisiting the overarching research question, *what role does non-state actors play in European policy implementation*, this chapter will present the main results from the interviews with the selected interviewees presented above. In the conclusions section the overarching question, as well as the two sub questions will be answered.

The results section is structured as follows. The first heading is intended to serve as a background of the ongoing development of Serbia's EU negotiation, and introduction for the main obstacles that the country faces. The data used for this section was based on the screening report from 2014, the annual progress reports, and the interviews. Following sections after that is mainly based on the interviews, as these serve as the main empirical data collected for the thesis. The EU-documents will be used to contrast the interviews and not be analysed by themselves. The headings in the following sections are structured based on figure 1 on page 7, and divided by the different steps in the Europeanization process according to rational institutionalism and sociological institutionalism.

### 4.1 The European Enlargement process – Chapter 27

The criteria for joining the European Union is laid out in 35 chapters, also referred to as the European Acquis Communautaire. In each chapter, it is laid out thematically what is required of the candidate country to join the EU. As European environmental policy is of interest of this thesis, only chapter 27 concerning the environment will be further explained.

Chapter 27 comprises of over 200 major legal acts covering horizontal legislation, water and air quality, waste management, nature protection, industrial pollution control and risk management, chemicals and genetically modified organisms (GMOs), noise and forestry. Considering its large number of legal acts, coupled with the technical and administrative difficulties, require significant investment from the candidate country. Here, a strong and well-equipped administration at national and local level is needed to be able to implement the acquis (European Commission, 2021). What is asked from the EU then, is both to align the national law with EU-law, and then to implement and enforce these laws in practice. Further, the EU underlines the inclusion of civil society in the development of environmental plans and policy, which Serbia as well have underlined for example by ratifying the Aarhus Convention.

More specifically, the EU acquis aims to promote sustainable development and protect the environment which is based on preventive action, the polluter pays principle, fighting environmental damage at source, shared responsibility and integration of environmental protection with other policies. Some of the EU goals are achieving climate neutrality by 2050, enhancing adaptive capacity, strengthening resilience, reducing environmental and climate pressures related to production and consumption and advancing towards a regenerative growth model. As an example, it could be setting emissions levels for power plants that needs to be met, or otherwise needs to be shut down. As mentioned, this requires heavy investments in both aligning these laws, but more importantly for this thesis, in implementing these directives in practice (COM, 2020c).

## 4.2 Setting the scene – Main obstacles for practical policy implementation in Serbia of European environmental policy and state of non-state actors involvement

As pointed out already in the screening process from the EC in 2014, several constraints continue to hamper Serbia's environmental policy implementation. These obstacles include administrative capacities of government, agencies and local authorities. The capacity issue in Serbia relates to several aspects, beginning with the lack of staff at national level within the government (European Commission, 2014). Until recently, the environmental department was merged with the department overseeing competences such as energy and culture. It was only in

2019 that the ministry of environment was established in Serbia. The capacity of the ministry is however limited, with not enough staff working with these issues (Interviewee D, author's translation).

The capacity issue is not constrained to the national level, but as well to having competent staff on the local level. Since most of the environmental legislation will be implemented on the local level, the capacity of local staff is of great value. The lack of trained technicians, inspectors and scholars are therefore one key obstacle for the practical implementation of European environmental policy in Serbia (COM 2020b, p.105).

Further, even though staff exists, having competent people on key positions is a more pressing issue. In this remark, the importance of appointing officials by merit, rather than politically is of essence. Experts have pointed on corruption being another obstacle hindering an effective implementation of environmental policy (Interviewee A, author's translation).

A key obstacle repeated from several interviewees, was the financial costs for Serbia, implementing all the environmental directives. Being one of the most financially demanding chapters, based on a financial forecast, it would cost Serbia around 10 billion euros to implement the environmental acquis of chapter 27 (Interviewee B). Coupled with the ongoing Covid-19 pandemic and economic slowdown, this is a heavy burden for a small country like Serbia (COM 2020b, p.105). Keeping in mind the costs of the other 34 chapters, makes it difficult to accumulate sufficient funding. All of which, making Serbia dependent on foreign investment and support.

The solution to all above mentioned obstacles boil down to what priority environmental protection receives from the government. So far, environmental issues have not been prioritized, which according to some of the interviewees are most likely are due to some of the aforementioned obstacles, making it costly for the government to implement and address them (Interviewee C, D & E). Based on the lack of sufficient administrative capacity, in terms of trained experts and in number of employees, non-state actors could be assumed to have a role to play in strengthening these capacities. Further, they could be expected to continue advocating for these issues, although it might not be prioritized by the government. Awareness-raising

activities are also a point which is repeatedly pointed out by the European Commission that Serbia needs to step up in the annual progress reports (COM 2020b, p.108).

The civil society has so far been active in tracking the development of the EU integration process in Serbia and has formed a National Convention on EU integration, covering all 34 chapters. The convention is led by NGOs, and organized through working groups. As an example, the convention published a shadow report scrutinizing the development of Serbia's EU integration, which have received international attention.

Furthermore, Serbian non-state actors are also consulted in the annual progress reports authored by the European Commission where Serbia's annual progress of EU integration is scrutinized (COM 2020, interviewee A, B & C). Furthermore, Serbia have ratified the Aarhus Convention which contains a directive on public participation, in respect of drawing up certain plans and programmes related to the environment (Interviewee C and D). Interviewee F highlights as well that many directives part of chapter 27 contains provisions for public participation and informing the public. An example is the Environmental Impact Assessment directive, meaning that whatever project an actor initiates, a study on the impact to the environment is needed. Included in the directive, is a requirement of involving the public (Interviewee F).

Under the forthcoming headings, the results from the interviews will be presented, and analysed through both rational institutionalism and sociological institutionalism, and structured based on figure 1 on page 7.

#### 4.3 Misfit between EU environmental policy and Serbia's environmental policy

Based on the heavy investment requirement, and Serbia's need of external assistance in implementing the environmental protection directives, this indicates a large misfit between the EU's, and Serbia's environmental policies. Coupled with the high number of directives that at the moment are subjected to being part of the transitional period (above 20 in total), it suggests that the misfit is indeed significant. According to interviewee A this number should be lowered to around 15 (Interviewee A, author's translation).

The directives needed to be part of the transitional period was identified through a gap analysis with the support from the Swedish Environmental Protection Agency (EPA). This support will further be developed in another section below, but importantly is the high number of directives required to be included in the transitional period. One of the difficulties in developing this gap analysis has been to find responsible ministries and individuals for certain directives. Indicating a lack of capacity within Serbian ministries (Interviewee A, author's translation).

A practical example of the misfit between Serbia's and the EU's environmental policies was discussed by interviewee C. Interviewee C highlight that sixteen thermal power plants in Serbia, emits as much emissions as 250 thermal power plants in Europe, due to the lack of requirement of built-in filters (Interviewee C, author's translation). According to the perspective of Europeanization this increases the pressure for change on the domestic level and provides new opportunities and constraints for the domestic actors.

Further highlighting the degree of misfit, interviewee A points out that Serbia will have trouble to implement EU environmental directives in time simply because of the large misfit between the environmental policies. The issues are not only specified to one sector, but in general when it comes to the environmental acquis. This was as well identified by the European Commission in the screening report from 2015, where implementation and enforcement were at an early stage (European Commission, 2014). When examining the annual progress report from 2020 it is evident that these obstacles still remain in Serbia (COM, 2020b).

The Europeanization process describes that misfit between EU policy and domestic policy opens adaptation pressure on the government to change their policies. This misfit then provides opportunities and constraints for the domestic actors, and is determined by, for example, who will bear the costs. According to interviewee D, even if the state is formally presenting opportunities and plans to implement EU policy, it does not fulfil it in practice.

Here the government agrees on one plan or strategy, and after that no one asks about it, not if it is fulfilled, not how it is progressing nor how much we have implemented (Interviewee D, author's translation).

The reason for this is because the misfit mentioned above constrains the state financially, politically and socially. Economically and politically complying with EU environmental

policies will mean that some large combustion and heating plants will not be allowed to continue being operational due to the high emissions. If it does not fulfil the EU requirements it will have to be shut down, causing people to lose their jobs. In a sense then, Europeanization provides constraints on the government as the implementation of these directives will be costly and potentially cost them political support as people will lose their jobs. This could for example help explain why the implementation stage of industrial pollution and risk management still is at an early stage. Here persistent capacity constraints are also slowing down the implementation process (COM, 2019).

Therefore, according to interviewee F, the NGOs and civil society will need to be integrated somehow in this process, to explain to the public what complying with EU environmental policy will mean.

By implementing water legislation, Serbia would get water treatment plants, by implementing industrial pollution emissions directive there will not be as much air pollutions. But at the same time, it will risk that some power plants will not get the permit to be operational and will have to shut down, which could lead to unemployment (Interviewee F).

Following the logic of rational institutionalism then, it would provide non-state actors with new opportunities to be part of the debate and raise awareness, but also to explain the importance of environmental legislation to the public. Subsequently it is important to highlight that there are different kinds on non-state actors, international, local, general, formal, and informal. But either way one of their collective key role is to raise awareness when they detect wrongdoing by the government, and try to put attention to this infringement (Interviewee F).

This misfit between EU and Serbian policy, provides adaptation pressures on the government to change these policies. It should also provide Serbian non-state actors with opportunities to get an increased role in advocating for practical policy implementation. However, as figure 1 states, related to rational institutionalism, this is affected by the number of veto points, capacity of both state and non-state actors, as well as the support by formal institutions. This will be discussed more below.



#### 4.4 Changes in decision-making authority and legal enforcement

According to rational institutionalism, one key way that the arising opportunities and constraints impacts the dynamic between the domestic actors is through changes in decision-making processes and in legal enforcement.

Based on the reoccurring remarks in the annual progress reports, and because Serbia have ratified the Aarhus Convention, Serbia need to include non-state actors and the civil society in policies and projects related to the environment. This relates both to access to information and the decisions taken by the government and governmental authorities. In practice however, interviewee E paints another picture.

It is starting to be visible that in practice there are a lot of problems. We have an opportunity to give our thoughts and remarks, which the ministry has to answer to. Oftentimes the NGOs and interested public give their opinions and that is almost never taken in a positive way. It is just noted that the civil society have participated in the consultation process, but there are very few examples that the implementer actually has heard the comments and inputs from the public (Interviewee E, author's translation).

This image was shared by interviewee C from CEKOR who explained that the government could simulate the involvement from the civil sector.

They can simulate that they have fulfilled the law and invited the civil sector in public discussions, by for example scheduling the debates on national holidays (Interviewee C, author's translation).

Other examples were that the relevant NGOs were not invited, or that projects were divided into several smaller parts, to have lower environmental damage. This is not surprising as it already in the screening report from 2014 was pointed out that the public consultations needs to improve (European Commission, 2014).

Interviewee C, D and E, each representing a non-state actor in Serbia, explained that the inclusion of civil society by the government oftentimes was only done on paper but not in practice. Suggesting that the opportunities provided by the misfit between Serbian- and EU environmental policy has not translated in decision-making authority or legal enforcement. Rather their role so far has been raising awareness, mobilizing the public and monitoring the development of Serbia's EU accession negotiations. Low levels of implementation is in line with both the screening report from 2014, and the annual progress reports from 2019 and 2020. In the reports it is pointed out that Serbia still is in early stages of implementation, suggesting that civil society has not been involved as much (European Commission, 2014, 2019, 2020b).

This narrative was partly confirmed by interviewee A, as their view was that civil society does not have a huge role in the decision-making process in Serbia, and was sceptic to them having a more formal role in that process. Instead, the belief was that this rests on the good will of the government to let them participate or not (Interviewee A, author's translation). Interviewee A did however refer to Serbian non-state actors as more suited to elaborate on this area.

Discussing with the interviewee from the European Commission, a more positive image of the interaction between the government and NGOs was presented. Interviewee B's view was that it was evident that the government was discussing with non-state actors and consulting with them. Interviewee B did maintain that it maybe was not as good as it should be, but that this process has started and that it is important. It is however, something the European Commission repeatedly remarks in their annual progress reports, highlighting that it is an on-going process (Interviewee B).

Some positive aspects were pointed out by the Serbian non-state actors participating in this thesis, regarding their role in practical policy implementation. This was particularly related to the National Convention for shadowing the EU accession negotiations. CEKOR is part of this convention and is in charge of monitoring the development of chapter 27. According to interviewee B from CEKOR, they were consulted in the process of creating the negotiating position and got to ask questions to the responsible ministry. Normally, these are secret documents, but the NGOs got an opportunity to scrutinize the negotiating position (Interviewee C, author's translation). Furthermore, they are following the implementation of both energy,

and environmental directives, in what the interviewee described as a “watchdog” role (ibid). According to interviewee C, CEKOR mainly comments on the domestic politics, analyse documents regarding climate change, and give alternative scenarios in how Serbia needs to shift to renewable energy sources (Interviewee C, author’s translation).

However, evident when looking at the changes in decision-making authority and legal enforcement, the potentially increased role for non-state actors, as stipulated by the Europeanization and desired by the EU, have not been fulfilled. Although there are some positive images and developments are occurring by including non-state actors, these actors have mainly received consultation status. Some formal inclusion is noticeable, but not a fully decisive role in practice. Meaning that they did not receive the increased role as the rational institutionalist perspective states, and the EU wants them to receive. Instead, their role is to raise awareness, participate in consultation processes, promote debate and so forth, which is itself is not a small role. Some positives could be seen in bringing about the negotiating position for chapter 27, but according to the interviewees from the Serbian civil society, it is not that inclusive in most of the times.

#### 4.5 Capacity of domestic actors

Whether or not the misfit between the domestic and EU policies, and the following adaptation pressure will lead to changes, is dependent on the capacity of the domestic actors, existence of multiple veto points and the support of formal external institutions. In this section, the capacity of the domestic actors will be discussed followed by multiple veto points and supportive formal institutions.

As mentioned, one of the crucial aspects in the Europeanization process is the capacity of the domestic actors. As described earlier, one of the biggest obstacles related to the Europeanization process and the implementation of European environmental policy in Serbia have been the capacity of governmental administration. During multiple interviews, and highlighted as well in the annual progress reports in previous sections, the capacity of Serbian ministries has been mentioned. As stated previously, EU environmental directives are costly and technically difficult requiring a strong administration. Interviewee D highlights that experts and civil society should be engaged to help. He agrees that there is not enough governmental capacity

today, but that this stems from a lack of willingness politically to develop the capacity and to include civil society to a larger extent. Instead he explains that they have different priorities (interviewee D, author's translation). Here the lack of willingness from the state, and lack of capacity, diminishes the potential role of non-state actors in practical policy implementation.

The willingness from the government was further problematized during the interview with interviewee F. According to the interviewee there is not enough financial capacity of Serbia to implement all the environmental directives. Meaning that if there are not enough financial resources to implement these policies, it becomes more difficult for civil society to impact these developments. According to interviewee F, the financial capacity was therefore central in the difficulty, and delay of, implementing environmental directives in Serbia (Interviewee F). The need to intensify the funding of green projects and environmental protection has as well been reiterated in the European Commission's annual progress reports over the years, most recent in 2020 (COM, 2020b).

One further question is whether economic constraint is a sufficient reason for not implementing the directives. For interviewee D and RERI, this boiled down to lack of political will. The government does not prioritize environmental protection and therefore the funding goes to secure employment, economic growth, and to attract investors. This was further highlighted by interviewee C, who said that the government is blaming lack of capacity as main reason for the slow implementation when in reality it is a matter of political will. As an example, interviewee C point out that the lack of capacity for implementing the environmental directives is evident when seeing that Serbia is late with its work on implementing the areas highlighted in the post-screening document from 2011 for chapter 27. While it is transposing the laws, it is not implementing them to the same extent (interviewee C, author's translation).

During the interview with interviewee A, she highlighted that in order for Serbia to implement all the environmental directives, they will need until the year of 2042. This is haltered not solely by the lack of capacity in terms of not enough human capital, but also by the need to place qualified workforce on the right positions. Instead, a problem according to the interviewee is that individuals are hired based on politics rather than competence, indicating that corruption could be an aspect hindering the Europeanization process. The low competence could in turn also hinder the inclusion of non-state actors as the ministry might not operate as good as it

should (Interviewee A, author's translation). Throughout the progress report from 2019 by the European Commission regarding chapter 27, a reoccurring theme is that enforcement capacities are missing in Serbia. Thereby confirming the image of low, or not sufficient competence levels in the national administration (COM, 2019). This is making the point mentioned by interviewee A about corruption even more pressing.

Further, investing in environmental protection, is expensive and requires a lot of financing, while simultaneously being a long-term investment. It requires at least five to ten years, meaning that it is likely that the government that initiated the investment and paid for the costs, will not be the one to receive credit for that development (Interviewee E, author's translation).

Summarizing the results of the interviews relating to low capacity of domestic actors, there are mainly four aspects impacting the role of non-state actors in environmental policy implementation. Firstly, it regards to the financial capacity of the government. If the government does not have adequate finances it severely hinders the non-state actors and civil society to impact this area rather than raising awareness, demonstrating and highlighting eventual infringements by the government.

Secondly, it comes down to the political will of the current government, meaning that non-state actors can act as pressure points and attempting to mobilize the public to call for more investments related to environmental policy, and environmental protection. Here the role of non-state actors is to inform the public about these changes and what implementation of these environmental directives will mean for the society.

Thirdly, since the capacity of the government is low, non-state actors such as experts, formal and informal organizations and the public could be used to complement the lack of capacity from the governmental side. However, the lack of political will makes it difficult for this exchange, partly because the non-state actors usually wants to go further than the government in terms of environmental protection.

Fourth, it is not only about implementing the directives but about enforcing them as well. Here the lack of capacity manifests in the fact that Serbia does not have enough trained experts, which could be related to the low level of academic programmes dealing with environmental issues in Serbia.

## 4.6 Multiple veto points

Based on the interviews conducted it is possible to distinguish multiple veto points in the Europeanization process in Serbia. During the interview with interviewee D, she explained how Serbia today is dependent on coal for its energy production. Cutting emissions and transitioning towards renewable resources risks alienating voters and loss of economic productivity. From the governmental side, taking action on this topic becomes politically unpopular, resulting in a lack of political will (Interviewee D, author's translation). In this case then both voters, and government can be seen as veto points and hindering the Europeanization process.

Interviewee F further elaborated on this topic and based on implementation assessments, a closing of current power plants not fulfilling EU requirement would severely impact social standards as well. Unemployment would as an example increase in Lazarevac to 36,51%, in Obrenovac to 29.09% and in Belgrade region to 19.68% (Interviewee F).

Since these power plants need investments, the money will have to come from somewhere. Because the state does not have enough capacity to invest in all of it, it needs external investors. Looking however at the costs of these investments, and the profitability on some of the power plants, the likelihood of securing investments is uncertain. According to interviewee F, the role of the non-state actors and civil society in this case is to inform the public of the consequences of implementation of EU directives.

Another veto point in the implementation of environmental protection directives are the private companies. Environmental protection is costly for the companies as well, leading to them oftentimes trying to undermine the implementation process. Even though they might not block the directives officially, they can act in a way to undermine it and exercise pressure on the government, by simply moving their company to another country. According to interviewee C, it is more important for the Serbian government to bring in investors, to have a functioning economy and employment, rather than to invest in the environment because the immediate return is not as clear (Interviewee C, author's translation). Coupled with this is the low penalties and fees for companies breaking the regulations, which makes it economically viable to continue breaking the law, rather than to actually implement the required regulations.

Reoccurring in the interviews is the political will from the government. This development has, according to interviewee A, deteriorated in the last few years. Wherein the current government have been more critical of the EU, and overall halted the EU accession process. Making it more difficult to invest in this sector.

Applying then the rational institutionalism perspective, these multiple veto points are severely hindering the Europeanization process. Furthermore, this also impacts the possibility for non-state actors and civil society to attain an extended role. The current role for civil society instead is to raise awareness, and work to combat and counter the veto points from the government, the companies, and the voters.

According to the rational institutionalism, based on the governments cost and benefit analysis of practically implementing environmental protection policies, it becomes costly for them from several perspectives. According to the interviewees the two most expensive areas for Serbian authorities relates to economical cost and political cost. Economically it would cost Serbia 10 billion euros to implement all the environmental acquis. This coupled with the financial capacity already being low, severely hinders the Serbian government. Further, politically implementing these directives would mean closing several power plants, due to their emissions. Meaning that it would risk people losing their jobs and in the long run risk of them losing voters and power.

As previously discussed, the political and economic costs in turn affects the political will of the government, which sees that it would cost more than it would benefit them, hence making them a veto point. From the non-state actors, it is a bit different depending on if they would benefit or lose on implementing environmental policies. Those non-state actors that also would benefit from not implementing environmental policies could support the government, or act in ways to undermine the implementation process. This could for example be companies investing in, or wanting to invest in, less environmentally friendly power plants, who simply see the increased costs that higher environmental standards would imply. The public that are set to lose their jobs if these power plants close, could also potentially act as veto points.

When it comes to those non-state actors that sees opportunities with the Europeanization process, such as affecting and impacting the domestic policies, could be expected to push for

the implementation of these policies. This could for example be formal NGO's working with these questions, or concerned citizens directly affected if the environment is not protected. According to the interviewees there had been several examples of this in Serbia, with individuals gathering to protest over the development of small hydro plants, or the worsened air quality. Therefore, the existence of veto points is directly dependent on these actors' cost/benefit analysis of what these changes would implement.

#### 4.7 Cooperation with supportive formal institutions

But just as there exists multiple veto points hindering this process, supportive formal institutions aiding and helping the Europeanization process exists as well. In Serbia, these formal institutions relate mainly to the European Commission, World Bank, EIB, but also countries like Sweden that is actively assisting and supporting the development and the EU-integration in Serbia.

According to interviewee C, NGOs in Serbia are in contact with the European Commission and several of the Directorate Generals (DG), such as DG Environment. As an example, NGOs are consulted and in dialogue with the European Commission when they are conducting the yearly progress reports for Serbia. This input is valuable according to both interviewees from the Serbian NGO's and the interviewee from the European Commission. Primarily, as it means that the European Commission gets a direct input from the civil society that they then can present and discuss with the government. Normally the European Commission have yearly subcommittee meetings with state representatives. Before the subcommittee meetings they consult NGOs, and in this dialogue, they discuss the issues that might have appeared during the year. This information the European Commission then can take forward to the Serbian government (Interviewee B).

Besides the European Commission, there are other international actors supporting Serbia in their transition towards alignment with EU environmental policy. Sweden has through the Swedish Environmental Protection Agency (EPA), since 2012 assisted Serbia in this work.



One example of the support the Swedish EPA has given, has been to highlight the importance of prioritizing environmental protection policies. As an example, the minister of environment in Serbia tried to set up a meeting with the Serbian finance minister to discuss environmental protection. After having no success in getting a response, Sweden brought this up with the EC, who organized a meeting in Belgrade where the two ministers met. After that, the finance minister realised the issue.

It is an interesting aspect that the environmental chapter is ignored when it is in fact one of the sectors you should start with first (Interviewee A, author's translation).

Furthermore, Sweden assists in preparations for the negotiating position that was submitted in January of 2020, and in helping the Serbian authorities to understand the complicated and complex EU rules and regulations (Interviewee A, author's translation).

Another important aspect of the external assistance of Sweden and the EC, have been to highlight and promote the inclusion of non-state actors. Through the cooperation project, Sweden invites local municipalities and NGOs, to give everyone a chance to raise their voices. Interviewee A explained that oftentimes it is a sharp dialogue, where NGOs and municipalities are perceived by the government as only complaining, and that it is exhausting to listen to them. And in the end, that the government does not believe that the non-state actors can add that much. Instead interviewee A from the Swedish EPA explains that:

We try to get over that hump, and promote a dialogue instead, so that both sides understand that the other side have knowledge. Speaking from the governmental side, we want them to come to the realisation that “we do not have all this knowledge within the government, and that actually it is quite fruitful if we talk with each other” (Interviewee A, author's translation).

Financing and support from the EU is as well focused on inclusion of the civil society. This is for example specified in the Instrument for Pre-Accession Assistance (IPA), which is one of the financing instrument from the EU (European Commission, 2017).

The European Commission is also a present actor in Serbia. According to interviewee B, the cooperation between the European Commission and Serbian state and non-state actors' manifests in different ways. One of these is through regional cooperation projects, where they try to strengthen the administrative capacities of the countries on solving transboundary issues, as well as increasing the cooperation between them. Here they try to bring the countries together, to find solutions and develop the capacities to manage these environmental projects. In general, a central part of the European Commission's support is capacity building. This is done through the EU Environment Partnership Programme for Accession (EPPA). They do trainings, both at national level and through the Technical Assistance and Information Exchange Instrument (TAIEX). An example is having expert missions from EU countries working with the countries from everything from five to ten days, to two to three years. Other than this they have technical meetings to explain legislation and explain what other member states are doing. Interviewee B underlines that,

the European Commission only can explain the legislation, how we interpret a certain directive, but when it comes to how this is implemented, on certain directives we always advise the country to go to a member state (Interviewee B).

The interviewee from the European Commission further elaborates how previously, the Serbian NGOs used to write to the European Commission on everything that was wrong in the country,

[...] but the commission does not have the power to go to a third country and stop it, we are not the police we cannot go to which city or village and see what they are doing with their waste there (Interviewee B).

In recent years, the NGOs have become better on submitting complaints on issues that the EC have the authority to comment on, such as transboundary issues. Part of the work is also pointing out other instances that they can raise their concerns to, such as the Bern convention that Serbia has ratified.

One question is if this support from external formal institutions is enough. According to interviewee D, this cooperation has not yet created the sufficient impact and pressure on Serbia, as he believes that the critique coming from external actors have not been sharp enough. He explained that this is something that the EU already is battling within itself, and that it therefore becomes more difficult to talk about Serbia. Further he said that the diplomatic language and lack of sufficient critique sends the wrong signal to the Serbian public and to everyone working for environmental protection, slowing down the EU process (Interviewee D, author's translation).

Another central issue is that Serbia will not be able to reach the amount of financing needed to implement the directives needed. This is the case even with financial support from the EU-institutions.

With EU money alone you cannot reach the 10 billion needed, so the country needs to look into loans and other financial institutions, making them relevant players as well. Mainly because they can decide what to finance and what not. The European Investment Bank, as an example declare itself to be a climate bank, meaning that they will not invest money in coal projects (Interviewee B).

But other than these, there are also private investors from other countries with other agendas and interests. Their influential power rises as well with the high cost of implementing the environmental directives as mentioned previously. Just by implementing the three largest sectors, water, industrial pollution, and waste, would cost approximately 7.8 billion euros (Pregovaracka grupa 27, 2015).

According to interviewee E, support from external institutions and actors ties directly in with the capacity problem.

The ENVAP3 project I would say, is crucial for chapter 27 and that financial and technical assistance from Sweden. Maybe some people would say that it could have gone better [...] but if it were not for that support, the whole burden of

chapter 27 would have been on one person from the ministry of environment". (Interviewee E, author's translation).

The capacity problem, with not enough people working with questions such as environmental protection makes it even more important with cooperation with supportive formal institutions, such as the Environment Accession Project 3 (ENVAP3) demonstrates.

As pointed out in the Europeanization process, the ability of the domestic actors to capitalize on the opportunities and constraints created by the misfit between European policies and domestic ones, is heavily impacted the capacity of the domestic actors. As have been pointed out in this section, the interviewees showcase how the support from external actors have been instrumental. This has most clearly been seen in the cooperation with the Swedish EPA, and the ENVAP3 project, but also in the dialogue with the EC and their inclusion in the annual progress reports.

One important aspect that has been evident in the process of data gathering have been the reflection if this support has been enough, and determining how much actually is enough. Previous research relating to rationalist institutionalism does not reflect upon the sufficient level on support. However, as has been raised during some of the interviews, this support could be questioned as not being sharp enough, and therefore slowing down the adaptation pressures and in turn the Europeanization process. Other aspects were that the lack of capacity makes Serbia more impactful by external supportive actors, making their influence more felt.

Like previous research have shown, there exists possibilities for non-state actors to circumvent the state, if it deems them to be wrong. As shown by Andromeda and Tutu (2014), the domestic actors, can in cooperation with the European Commission put pressure "from above" and in that case, influence the government. Even though the actors does not have those opportunities domestically. This is positive for Serbian civil society, as the government have bene cracking down on them more and more in last years. But this can be difficult because Serbia is not an EU member state. Could this be argued to have the same effect in a third country? Based on EU conditionality EU does have an asymmetrical power relationship with candidate countries. However, as seen in the interviews, NGO's are sceptical of their impact, because they believe

that external actors have not put sufficient pressure on Serbian authorities. Resulting in it being more difficult for European Commission to and NGOs to circumvent the governments, but at the same time not impossible to influence them as EU conditionality and EU membership strengthens the civil society and the European Commission's possibility to impact the government.

But, interviewee B stated that, the European Commission does not have the right or possibility to go in and tell countries what to do and what not to do, or as she put it "we are not the police" (interviewee B). Making it understandable why the civil society receives such an important role from the EU.

To summarize, the non-state actors are according to the interviewees the most important actor opposing the government, and that it needs to be active. The European Commission cannot go in and tell the domestic state- and non-state actors what to do. Instead, the role given to non-state actors is highly dependent on the national government and if they allow them to have a bigger role or not. Today in Serbia, non-state actors have an important role in raising awareness of environmental issues, but their role could also be to implement and to be consulted as experts. This is not always the case today, where instead non-state actors are only formally included, and instead taking up the role of raising awareness, protest, and to put it on the political agenda. Formal institutions can support the non-state actors working to achieve these changes and help put pressure on the government. However, as the results show, according to some this is not enough. Primarily based on the diplomatic language from the external actors, as they do not want to push away Serbian authorities with risk of Serbia instead increasing its ties with Russia and China. The European Commission, point out that they are not the police but that the first instance to aid non-state actors should be the national courts as the European Commission mainly only can aid and assist in transboundary issues.

#### 4.8 Collective understandings

According to sociological institutionalism, new norms, ideas and collective understandings can additionally put adaptation pressures on governments in the Europeanization process. This could be manifested through formal institutions, civil society, individuals or non-state actors in

general. In Serbia, this could be seen in recent times by increased protests in bigger cities in Serbia. Recent developments show that more environmental collective understandings are spreading in Serbia as well, exemplified by the quote below where both the public and media helps spread these collective understandings.

The public is more and more informed, and secondly the independent media that do not have the same coverage as mainstream media, have started engaging more with these topics, and regularly write about them (Interviewee D, author's translation).

So far, the response from the government have been targeted and not genuine according to some of the interviewees.

They have seen that this topic is important to the people, and that they have an interest in it. So now they are going to put forward how they are doing something on that topic. If the reports say that air quality is the most important topic of the day, they will take a picture of how they are planting trees, or that they have opened the public debate on the strategy for better air quality in Belgrade and so on. This approval is the only thing motivating them (Interviewee D, author's translation).

To have collective understandings is also a way of ensuring lasting changes, where behaviour changes are needed to be able to put adaptation pressure on the government in the long-term. Illustrated by the first quote below, is an example of what happens if there is not a behaviour change, meaning that actors will continue to pollute the environment.

For example, we have 900 found illegal landfills where people throw waste. Then someone comes and cleans up 750 of these, but next year 700 of these returns. You need to teach the behaviour of all actors. Additionally, the biggest problem are the low fines, simply because the political will is not there (Interviewee C, author's translation).

I think that you have a lot of protests in Serbia, more and more in recent times. People are upset with the development of small hydro plants and the bad air quality. I believe that this local activism is very important, in cities where these changes take place (Interviewee C, author's translation).

The second quote above paints an image of an increase of public interest for environmental protection. This viewpoint is shared across all interviewees in this thesis, both Serbian non-state actors, the European Commission and Swedish EPA. Several times the recent public protests regarding the worsened air quality in the cities, or the rapid development of small hydro plants, are mentioned as examples of new emerging collective understandings in the interviews. Non-state actors here come to the forefront as important counter measures to the lack of environmental policy implementation in Serbia. By actively protesting and raising awareness, as well as putting political pressure at the government, they are impacting/forcing change.

This is not only an important signal to the government, but to the rest of the society as well. As the quote below demonstrates, if people see that nobody else raises these questions, then nobody will do it.

Everyone likes to live in a clean and safe environment. But if people see that nobody else does it, then they ask themselves why they should do it. But people still cooperate, and the information is shared across them through internet and social media (Interviewee C, author's translation).

The spread of examples through internet and social media becomes even more important in Serbia due to the situation of the press in the country, limiting the possibilities of non-state actors to demonstrate their opinion.

The media is quite regulated in Serbia, and have had some issues with freedom of press in last years. The NGOs therefore have limited possibilities of expressing their opinions (Interviewee A, author's translation).

These emerging new collective understandings in Serbia have so far however not translated to having a significant impact on collective actions of the government, and in their relationship with formal NGOs.

In the last few years there has been some examples of good cooperation, but it always almost stops at advocacy. That the ministry acknowledges the problem but it does not go any further. When it comes to the inclusion of NGO's, Serbia still has not reached the level where we truly can have an open dialogue (Interviewee E, author's translation).

#### 4.9 Norm entrepreneurs

The norm entrepreneurs in Serbia are the non-state actors. Both related to the public and to formal NGOs.

As an example, when the development of small hydro plants in the city of Rakit, the inhabitants organized themselves. There were protests, even physical altercation between them and the investors. Then the same scenario happened 20 km from there, in a city with similar development. And then it kept spreading to cities that were in the same situation (Interviewee D, author's translation).

Several interviewees highlight the role of the public, and local participation as important norm entrepreneurs, in the sense that they put pressure on the government to change. When it comes to the formal non-state actors, interviewee C explained that their organization, CEKOR have been part of the national convention of EU integration in Serbia, which monitors the development of the EU-accession. Their role has been to follow the developments of chapter 27 on national level. Here they act as norm entrepreneurs, since they are usually pushing the government to go further in environmental protection than they normally do. They act as a good counter balance to the state and provide new perspectives and solutions.

You have the role to be part of the formulation of the politics and the strategies that are put forward, to put pressure on the relevant authorities that they have to



fulfil what they say they are going to do, to fix what they are doing wrong. And I think that this pressure from the civil society is the most important, as sort of a “watchdog” role (Interviewee C, author’s translation).

Further,

The NGOs role is to alert the publics, to publish relevant new information, to share their knowledge, investigations, and assessments of what is going on in the country, to present solutions to the problems and how to move forward. That is the role of NGOs (Interviewee C, author’s translation).

This image is shared from interviewee B, as she explain that

It is actually not us that much but the civil society in the countries to be very vocal about that, to try to put the environment protection and the negotiation of this chapter high on the political agenda (Interviewee B).

According to interviewee B, the NGOs are very active in the region, and their work pays off because the governments in the region have started to realise that it is important to address environmental protection. Further she explains that the government in Serbia is currently starting to consider investing in this area, before the formal negotiation of chapter 27 even have opened. How much of this can be credited to the non-state actors is according to the interviewee difficult to assess. (Interviewee B).

Another non-state actor that can act as important norm entrepreneur is businesses.

Businesses are also very important in environmental protection. Because they can help but they can also destroy a lot. You have companies in the country that are discharging polluted water in the rivers without treatment and we have received complaints about it [...] and to address it is a public issue, so they can be influencers of the policy (Interviewee B).

Further interviewee B elaborates that these companies are impactful because they are big investors, meaning that they influence policy making quite high according to her.

But on the other hand, you have people wanting to invest in recycling and then they would push the country to have implementation of recycling. This is also generating money, and that is also the positive part of it (Interviewee B).

It is important therefore to remember that businesses do not automatically mean harm to the environment, but that they have the potential of being important norm entrepreneurs, as their actions undoubtedly affects the government since they employ a lot of citizens and bring about investments.

The more active these norm entrepreneurs are, and the more they can make EU policies resonate with domestic norms, the higher are the chances of bringing about domestic change. Part of the process of making EU policies resonate with domestic norms is also to raise awareness of environmental protection, and how important that is to Serbia nationally as well.

#### 4.10 Cooperation with informal institutions

Transnational networks serve as informal institutions which can both strengthen and support local and national non-state actors domestically. Both RERI and CEKOR cooperate with international actors with similar aims and goals. In CEKOR's case, they are part of the CEE Bankwatch network, which they have conducted monitoring projects of implementation of environmental protection and their impact on social issues.

Furthermore, both RERI and CEKOR are part of regional cooperation with other NGOs in the region.

These countries share the same language, and the problems in each country is quite similar, and the political system operates in similar ways (Interviewee C, author's translation).

It is mentioned that each of the countries have reached different levels when it comes to EU integration, where Croatia have come the furthest, meaning that actors in Serbia have been able

to learn from their mistakes and their experience in this EU-accession process. From the NGOs they highlight the potential of regional cooperation even though politically there have been less cooperation.

This image is shared by interviewee A, who points out that international cooperation among Serbian NGOs, and international NGOs such as WWF, exists in regional cooperation networks. Furthermore, she explains that the European Environmental Agency (EEA) is also present in the region, gathering non-state actors from Serbia, and neighbouring countries. Once again, their aim is to raise awareness of environmental protection in this area, but also to strengthen cooperation among these actors on transboundary issues. It is also on transboundary issues that the European Commission can operate, as it is difficult for them to interfere in domestic issues.

Interestingly, the domestic Serbian non-state actors are not as optimistic as external actors, when they describe their involvement in Serbia's environmental policy implementation. Rather they question the government's ambition and willingness to listen to the civil sector and to be consistent on the issues of environmental protection, as this is an ongoing process.

## 5. Conclusion

Non-state actors have mainly received a consultation role in the practical implementation process in Serbia. Their role has been to raise awareness, to organize public debate and to explain the impact of implementing environmental protection policies to the public. The roles of non-state actors in European policy implementation, has therefore mainly been consulting, monitoring and advocating for practical policy implementation. Through campaigns and interactions with the public sector, they aim to align the collective understandings of Serbia closer to the EU. Furthermore, the results point to increased collective understandings of the public sector, which is similar to the EU understandings and demands of environmental protection.

Looking at the state actors lack of capacity, one could see the potential of including non-state actors to serve as a complement, to fill the ‘capacity gap’. Their role is however hampered by the low political will, and the low economic capacity of the government, and are not included to the extent that they could have been. The results points towards that non-state actors potential role as capacity strengthening actors have not yet been fully utilized in Serbia, meaning that there is potential to grow.

From this study we have learned empirically that the role of non-state actors in policy implementation in Serbia has been to mainly raise awareness about environmental issues. They have not received a complementary role, as could have been expected from the EU.

To answer the first sub question *How do non-state actors in Serbia participate in the implementation process related to environmental policies?*

Non-state actors in Serbia participate either by voicing their opinion through the EU, by demonstration or by being consulted on few occasions. They have formally been included in some consultation processes, but it remains unclear if this have had any implication in practice.

To answer the second sub question *Have non-state actors in Serbia received any formal decision-making authority in the environmental policy implementation process?*

Non-state actors have not received any formal decision-making authority in the environmental policy implementation process, but they have been consulted on some occasions.

Theoretically the results from this thesis suggest that the Europeanization process does not automatically mean that non-state actors receive a greater role in the policy implementation, and that in some countries, rather their role is to monitor the development of the implementation process and to raise awareness.

## 6. Discussion and further research

Based on rational institutionalism one would expect state actors to include non-state actors due to their own weak capacities to implement environmental policies, but the results in this thesis point at this not happening in practice. Due to low financial capacity and political will, coupled with a high economic and political cost for the government, the non-state actors are not included as it is not in the interest of the state to effectively implement these directives. Implementing the EU environmental directives would cost the government several billion euros, and coupled with the financial capacity already being low severely hinders the Serbian government. Politically, implementing these directives could mean closing several power plants due to their emissions, meaning that it would risk people losing their jobs and in turn not voting for the government. This in turn makes the government a veto point, as they see it in their interest to slow down the Europeanization process. In theory, and if the political will is there, non-state actors could have the role of filling the ‘capacity gap’ of the government, as experts and partners. As has been seen in other countries. This has however not occurred to the same extent in Serbia. Rather non-state actors that are promoting environmental protection have mainly been used to raise awareness, protests and putting environmental issues on the agenda.

In itself, raising awareness and putting environmental issues on the agenda, is not a small role. It is however, not the full use of the potential of non-state actors, when looking at the EUs ambitions and using the rationalist institutionalist perspective of Europeanization. And furthermore, a role that might would have been expected in other contexts. As non-state actors that are supporting the environmental protection directives in general want to go further than the government, they are not included to the same extent that they potentially could, simply because they are more ambitious in this area.

The excuse of financial capacity and administrative capacity is however, not enough as the potential to include non-state actors are there to strengthen these capacities. If the government would have been serious in their practical policy implementation, it could be argued that they would have included non-state actors more, for example as experts. Although, the results in this thesis points at the government consulting the non-state actors in some cases, they do not listen to them as well as they potentially could. Instead, they are slowing this process down as their

economic and political costs are too high, according to the Europeanization process and rational institutionalism.

Looking at the non-state actors it is a bit different. Those non-state actors that are set to benefit by not implementing these policies could also be argued to be veto points. This could for example be companies investing in these plants, or wanting to invest, who simply see the increased costs that these directives would mean. The public that are set to lose their jobs by increased environmental protection, could also be seen as veto points.

When it comes to those non-state actors that are seeing an opportunity to benefit from the Europeanization process, and impact the domestic policies, will most likely push for these. In this thesis, examples of these are non-state actors that are promoting environmental protection, and public directly affected by worsening environmental standards. Therefore, the existence of veto points is directly dependent on these actors' cost and benefit analysis of what these changes would mean.

Summarizing the rational institutionalist perspective then, it can be said that non-state actors has a role, but this role could be more impactful and more included. On the other side, not being included means that the non-state actors can be in opposition, which might make it easier for them to criticize the government and to fully act as this watchdog role, as was described in the interviews.

Based on the sociological institutionalist perspective, differing collective understandings between Serbia and the EU will also place adaptation pressures on Serbia. This will be directed by norm entrepreneurs, which in this case is formal NGO's and interested public that are promoting environmental protection. They exert pressure on the government through scientific evidence, by organizing protests, and by cooperating with transnational networks. In Serbia NGO's have been seen to organizing protests and raising environmental issues on the political agenda. Furthermore, the public have been increasingly vocal about environmental issues which could be seen in the protests due to worsened air quality and the development of small hydro plants. Effectively, through sociological institutionalism it can be argued that behavioural

changes are occurring in Serbia, as the collective understandings are becoming more similar with the EU.

Furthermore, these norm entrepreneurs are crucial in exercising adaptation pressures on the government according to sociological institutionalism. The more active these norm entrepreneurs that are promoting environmental protection are, and the better they are at aligning EU environmental policies with the domestic policies, the higher are the chances of putting adaptation pressures on the government. Through campaigns and interactions with the public sector, these actors aim to align the collective understandings of Serbia closer to the EU.

Informal institutions such as transnational networks could also aid norm entrepreneurs in Serbia, as non-state actors in other countries can share their experience and their resources with Serbian non-state actors. Serbian non-state actors especially cooperate with neighbouring countries non-state actors. Although each of the countries have reached different levels when it comes to EU integration, actors in Serbia have been able to learn from their mistakes and their experience in the EU-accession process. Further strengthening non-state actors in Serbia.

Summarizing sociological institutionalism then, it can be said that non-state actors that are promoting environmental protection policies and concerned public, are acting as norm entrepreneurs that are aiming to align the collective understandings of Serbian actors, with the EU's. The collective understandings in Serbia are increasingly becoming more similar to the EU's, which could be exemplified by the increased numbers of protests and concerns over environmental issues in Serbia. Lastly, transnational networks, especially in the neighbouring countries aids non-state actors in Serbia, further strengthening their capacity.

Whether the non-state actors can exert enough adaptation pressures on the national government to fully implement EU environmental policies is yet to be seen, but evident is that a combination of the rational and sociological institutionalist perspectives is beneficial when attempting to explain the process of Europeanization. Choosing one over the other, eliminates potential explanation factors in the process.



The exclusive focus on Serbia in this thesis, has limited the thesis ability to generalize its findings. By not including other countries, the opportunity to do cross-country comparisons became hindered. However, this is something that would be possible for other MA theses or doctoral studies as further research. In this thesis, in-depth quality in one country was favoured over generality in several countries.

Europeanization in Serbia, and its accession negotiations with the EU is an ongoing process, meaning that it is dynamic process that is constantly affected by ongoing developments. One such key development has been the introduction of the new accession methodology, which have been introduced to new candidate countries. If, and how Serbia will take part in this new methodology is still unclear. Either way, it poses direct questions of how this change will affect the role of non-state actors, as fundamental values such as rule of law have been argued to be more underlined. Future researchers might then scrutinize if this new methodology will give non-state actors a larger or smaller role, or whether their involvement will be the same going forward.

## References

- Andonova L, Tutu, I. (2014), Transnational Networks and Paths to EU Environmental Compliance: Evidence from New Member States. *Journal of Common Market Studies*.
- Bache I, Andreou, G, Atanasova, G, & Tomsic, D. (2011), Europeanization and multi-level governance in south-east Europe: the domestic impact of EU cohesion policy and pre-accession aid, *Journal of European Public Policy*, 18:1, 122-141.
- Brinkmann, S., Kvale, S., (2015), *InterViews, Learning the Craft of Qualitative Research Interviewing*. 3 ed. London: SAGE Publications Inc.
- Börzel T, & Buzogány A, (2019), Compliance with EU environmental law. The iceberg is melting. *Environmental Politics*, Volume 28, 2019 - Issue 2: The Future of European Union Environmental Politics and Policy.
- Börzel, T. & Fagan, A. (2015), Environmental governance in South East Europe/Western Balkans: reassessing the transformative power of Europe, *Environment and Planning C: Government and Policy* 2015, volume 33, 885 – 900.
- Börzel, T. A., (2011), When Europeanization Hits Limited Statehood: The Western Balkans as a Test Case for the Transformative Power of Europe. (KFG Working Paper Series, 30). Berlin: Freie Universität Berlin.
- Börzel T.A. (2009), New Modes of Governance and Accession: The Paradox of Double Weakness. In: Börzel T.A. (eds) *Coping with Accession to the European Union*. Palgrave Studies in European Union Politics. Palgrave Macmillan, London.
- Börzel, T. A., (2003), How the European Union Interacts with its Member States. *IHS Political Science Series: 2003*, No. 93. [Working Paper].
- Börzel, T.A., & Risse, T., (2000), When Europe Hits Home: Europeanization and Domestic Change. *European Integration online Papers (EIoP)*, Vol. 4, No. 15.
- Börzel, T A, Risse, T., (2003), Conceptualising the domestic impact of Europe. In: Featherstone, K, Radaelli, C (eds) *The Politics of Europeanisation*, Oxford: Oxford University Press, 57–80.
- COM, (2020a), Enhancing the accession process - A credible EU perspective for the Western Balkans, *European Commission*, Available online: [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/enlargement-methodology\\_en.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/enlargement-methodology_en.pdf)
- COM, (2020b), Serbia 2020 Report, *European Commission*, Available online: [https://ec.europa.eu/neighbourhood-enlargement/sites/default/files/serbia\\_report\\_2020.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/default/files/serbia_report_2020.pdf)

COM, (2020c), General Union Environment Action Programme to 2030, *European Commission*, available online: <https://ec.europa.eu/environment/pdf/8EAP/2020/10/8EAP-draft.pdf>

COM, (2019), Serbia 2019 Report, *European Commission*, available online: <https://ec.europa.eu/neighbourhood-enlargement/sites/default/files/20190529-serbia-report.pdf>

Cortazzi, M., Pilcher, N., & Jin, L., (2011), Language Choices and 'blind shadows': investigating interviews with Chinese participants, *SAGE Journals*, Volume: 11 issue: 5, 505-535.

Döringer Stefanie (2021), 'The problem-centred expert interview'. Combining qualitative interviewing approaches for investigating implicit expert knowledge, *International Journal of Social Research Methodology*, 24:3, 265-278.

Elbasani, A. (ed.) (2013), *European Integration and Transformation in the Western Balkans Europeanization or Business as Usual?*, Routledge, London.

Eliantonio, M., (2018), The role of NGOs in environmental implementation conflicts: 'stuck in the middle' between infringement proceedings and preliminary rulings?, *Journal of European Integration*, 40:6, 753-767.

Epstein, A.R., & Sedelmeier, U., (2008), Beyond conditionality: international institutions in postcommunist Europe after enlargement, *Journal of European Public Policy*, 15:6, 795-805.

Esaiasson, P., Gilljam, M., Oscarsson, H., Towns, A.E. & Wängnerud, L. (2017), *Metodpraktikan: konsten att studera samhälle, individ och marknad*. (Femte upplagan). Stockholm: Wolters Kluwer.

European Commission, (n.d.), "The Aarhus Convention", *European Commission*, Available online: <https://ec.europa.eu/environment/aarhus/>

European Commission, (2014), Screening report Serbia, chapter 27 – Environment, *European Commission*, available online: [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/screening\\_report\\_serbia\\_-\\_chapter\\_27\\_-\\_environment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/screening_report_serbia_-_chapter_27_-_environment.pdf)

European Commission, (2017), EU Support to the Environment Sector, *European Commission*, available online: [https://ec.europa.eu/neighbourhood-enlargement/sites/default/files/2017-040499.05-eu\\_support\\_to\\_the\\_environment\\_sector.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/default/files/2017-040499.05-eu_support_to_the_environment_sector.pdf)

European Commission, (2021), European Neighbourhood Policy and Enlargement Negotiations, *European Commission*, available online: [https://ec.europa.eu/neighbourhood-enlargement/policy/conditions-membership/chapters-of-the-acquis\\_en](https://ec.europa.eu/neighbourhood-enlargement/policy/conditions-membership/chapters-of-the-acquis_en)

Fagan A, Sircar, F (2015), *Europeanization of the Western Balkans: Environmental Governance in Bosnia and Hercegovina and Serbia*, Palgrave Macmillan, London.

Grabbe, H, (2003), Europeanization Goes East: Power and Uncertainty in the EU Accession Process in (ed.) Featherston K, & Radaelli C. M., *The Politics of Europeanization*, Oxford Scholarship.

Héritier, A, Kerwer, D, Knill, C, Lehmkuhl, D, Teutsch, M, Douillet, A C (2001), *Differential Europe*, Lanham: Rowman and Littlefield.

Kumar, K. (1986), *Conducting Key Informant Interviews in Developing Countries*, AID Program Design and Evaluation Methodology, Report No. 13. A.I.D., Washington D.C.

Pregovaracka grupa 27, (2017), Transposition and implementation of environmental and climate acquis – chapter 27: status and plans, *Pregovaracka grupa 27*, available online: [http://www.pregovarackagrupa27.gov.rs/?wpfb\\_dl=71](http://www.pregovarackagrupa27.gov.rs/?wpfb_dl=71)

Sedelmeier, U., (2013), Europeanization, in (ed) Jones, E., Menon, A., Weatherill, S., *The Oxford Handbook of the European Union*.

Sedelmeier, U., (2012), Is Europeanisation through Conditionality Sustainable? Lock-in of Institutional Change after EU Accession, *West European Politics*, 35:1, 20-38.

Schimmelfennig, F. & Sedelmeier, U. (2019), The Europeanization of Eastern Europe: the external incentives model revisited, *Journal of European Public Policy*, 27:6, 814-833.

Schimmelfennig F., Sedelmeier U. (2008). Candidate Countries and Conditionality. In: Graziano P., Vink M.P. (eds) *Europeanization*. Palgrave Macmillan, London.

Schimmelfennig, F & Sedelmeier, U. (2004), Governance by conditionality: EU rule transfer to the candidate countries of Central and Eastern Europe, *Journal of European Public Policy*, 11:4, 661-679.

Sotirov, M., Lovric, M., Winkel, G., (2015), Symbolic transformation of environmental governance: implementation of EU biodiversity policy in Bulgaria and Croatia between Europeanization and domestic politics, *Environment and Planning C: Government and Policy*, Volume: 33 issue: 5, 986-1004.

Van Nes, F., Abma, Tineke., Jonsson, H., Deeg, D., (2010), Language differences in qualitative research: is meaning lost in translation? *European Journal of Ageing*, 7(4): 313–316.

Versluis, E. (2007), Even rules, uneven practices: Opening the ‘black box’ of EU law in action, *West European Politics*, 30:1, 50-67.

Wunsch, N. (2015), Beyond instrumentalisation: NGO monitoring coalitions in Croatia, Montenegro, and Serbia, *East European Politics*, 31:4, 452-467.

Yin, K. R., (2014), *Case Study Research: Design and Methods*, SAGE Publications Inc.

Zhelyazkova, A. & Thomann, E. (2021), 'I did it my way': customisation and practical compliance with EU policies, *Journal of European Public Policy*.

# Appendix

## Appendix 1 – The coding frame for the interviews

	Attributes	How to detect/Identify it?
	<b>Rational institutionalism</b>	
	Misfit providing new opportunities and constraints	What types of opportunities and constraints does Europeanization bring to the domestic policies? Is there any gap between EU policy and national policy? This could be exemplified by mentions of gap analysis, of differing goals and rules between Serbia and the EU.
	Decision-making authority	Any changes in decision-making authority between state, and non-state, actors? Have non-state actors received any decision-making authority in Serbia? How are they consulted in formulating new rules and strategies? This could be exemplified by mentions of changes in the decision-making process, locally and nationally.
	Legal enforcement	Any changes in legal enforcement possibilities for non-state actors? Have non-state actors received any legal enforcement powers in Serbia? This could be exemplified by mentions of legal enforcement powers in Serbia for non-state actors.
	Multiple veto points in a country's institutional structure	Which are these veto points? Organisations, private actors? Which actors act as veto points in developing and implementing EU environmental policy? This could be exemplified by mentioning some actors as hindering the process of implementation of EU policy.
	Existence, and cooperation with supportive formal institutions	What type of interaction does the NGOs have with formal institutions such as the EC or the EBRD? This could be exemplified by mentions of certain projects or programmes. Or if these institutions have invested or supported Serbia on specific occasions.
	Capacity of domestic actors, both state, and non-state actors	Does the actors have the possibility to part take in the implementation? This could be exemplified by mentions of capacity constraints, or by examining the capacity of Serbia, and national actors ability to part take in the implementation process.
	<b>Social institutionalism</b>	
	New norms, ideas and collective understandings	Have there been a rise in environmental protests/agenda in Serbia in recent years? This could be exemplified by mentions of new norms and ideas

		starting to become more and more common in Serbia. Are there an increase in the interest and public debate on environmental protection?
	Norm entrepreneurs	Use scientific knowledge, media, campaigns etc to present their perspective. This could be exemplified by mentions of certain actors being driving in the promotion of environmental protection. Other examples could be if some actors are actively trying to influence the public debate and authorities.
	Cooperative informal institutions	Does national NGOs cooperate with transnational networks/NGOs? This could be exemplified by mentions of cooperation between Serbian non-state actors with transnational networks, or regional non-state actors.

Europeanization only leads to a redistribution of resources and differential empowerment at the domestic level if (1) there is significant misfit providing domestic actors with additional opportunities and constraints (necessary condition), and (2) domestic actors have the capacities to exploit such new opportunities and avoid constraints, respectively (sufficient condition)

## Appendix 2 – Questionnaire in English

### State:

1. According to you, how have Serbia planned for and implemented the goals of chapter 27 over the years?
2. In your view, how does Serbia's current environmental policies correspond to the EU's environmental policies?
3. In your opinion, what are the main obstacles to environmental policy implementation, and chapter 27, in Serbia?
4. From your experiences, how would you say that Serbian authorities cooperate with external donors/formal institutions?
5. In your view, does Serbia have sufficient institutional or other capacity to efficiently implement developed policies and measures?

### NGO:

1. How would you assess the role of environmental NGOs today, in Serbia's implementation of EU environmental policies?
2. What is your view, have NGOs received any sort of decision-making authority, as relates to the adoption of EU environmental policies in Serbia?
3. If NGOs are not content with how they are part of environmental policy implementation, , what opportunities do they have to voice their opinions?
4. In your opinion, does the enlargement process empower, or constrain environmental NGOs in Serbia?
5. Does NGOs have any direct relations with EU institutions?
6. To your knowledge, does the Serbian NGOs cooperate with international NGOs? And if so, how?

### Public:

1. In your opinion, how does the public view environmental policies in Serbia?
2. Have environmental issues gotten higher up the political agenda in Serbia in recent years?



## Appendix 3 – Questionnaire in Swedish

### Staten:

1. Enligt dig, hur har Serbien planerat för, och implementerat målen för kapitel 27 genom åren?
2. I din åsikt, hur väl överensstämmer Serbiens nuvarande miljöpolicies med EUs miljöpolicies?
3. Baserat på dina erfarenheter, vilka tycker du är de största hindren för implementeringen av EUs miljöpolicies och kapitel 27 I Serbien?
4. Baserat på dina erfarenheter, hur skulle du beskriva Serbiens samarbete med externa givare och formella institutioner? Som exempelvis Naturvårdsverket.
5. I din mening, har Serbien tillräcklig administrativ och institutionell kapacitet för att kunna implementera EUs miljöpolicies och direktiv?

### NGO:

1. Hur skulle du beskriva rollen som icke-statliga organisation i Serbien har idag, vad gäller implementeringen av EUs miljöpolicies?
2. Enligt dig, har icke-statliga organisationer fått någon sorts beslutsfattande makt, vad gäller implementeringen av EUs miljöpolicies i Serbien?
3. Om icke-statliga organisationer inte är nöjda med deras roll i implementeringen av miljöpolicies, vilka möjligheter har de då att uttrycka sina åsikter?
4. I din mening, skulle du säga att utvidgningsprocessen stärker, eller hindrar icke-statliga organisationer i Serbien?
5. Har icke-statliga organisationer någon direkt kontakt med EU-institutioner eller externa aktörer?
6. Till din vetskap, samarbetar serbiska icke-statliga organisationer med internationella icke-statliga organisationer? Och i så fall, hur då?

### Allmänheten:

1. Enligt dig, hur ser Serbiens befolkning på miljöpolicies I Serbien?
2. Tycker du att miljöfrågor har hamnat högre upp på den politiska debatten I Serbien på senare år?

## Appendix 4 – Questionnaire in Serbian

### **Vlada:**

1. Po vama, kako je Srbija tokom godina planirala i primenila ciljeve iz poglavlja 27?
2. Po vašem mišljenju, kako trenutne politike zaštite životne sredine u Srbiji odgovaraju politikama zaštite životne sredine EU?
3. Šta su, po vašem mišljenju, glavne prepreke za sprovođenje politike zaštite životne sredine i poglavlja 27 u Srbiji?
4. Kako biste vi opisali saradnju između Srpske vlade i partneri iz inostranstva, kao na primer EU Komisija?
5. Po vama, jel ima Srbija dovoljan kapacitet sto se tiče administracije, da bi bili u mogućnosti da primene ekološke direktive EU?

### **NVO:**

1. Kako biste ocenili ulogu ekoloških nevladinih organizacija danas u primeni ekoloških politika EU u Srbiji?
2. Kakvo je vaše mišljenje o tome da li su nevladine organizacije dobile bilo kakvu nadležnost za donošenje odluka, u vezi sa usvajanjem ekoloških politika EU u Srbiji?
3. Ako se NVO ne zadovoljavaju time u kojoj meri cine deo sprovođenja politike zaštite životne sredine, kakve mogućnosti imaju da iznesu svoje mišljenje?
4. Po vašem mišljenju, da li proces proširenja osnažuje ili ograničava ekološke NVO u Srbiji?
5. Jel imaju nevladine organizacije direktan kontakt, ili saradnju, sa institucije EU ili drugim internacionalni partnera?
6. Po vaše znanje, jel saradjuju nevladine organizacije iz Srbije sa internacionalne NVO ili NVO iz druge države?

### **Javnost:**

1. Po vama, kakvo je mišljenje državljanima Srbije o ekološke politike?
2. Jel bi rekli da je ekološka politika postala bitnija u Srbije u zadnje godine?

## Appendix 5 – Letter request for interviews

Dear Mr/Mrs,

Since the beginning of the 21st century, the EU has progressively become more ambitious on policies related to the environment and climate change. During that same time span, it has continued its EU enlargement, in 2004, 2007 and 2013. In addition, five countries have ongoing EU accession negotiations.

Adhering to the environmental *acquis communautaire* has been one of the most difficult and technical *acquis* new member states have had to comply to. Subsequently, it has also been one of the areas with most infringement cases. At the same time, the Central Eastern European (CEE) countries joining the EU have been characterised with weak state, and non-state actors. The same could be said of the South East European (SEE) countries, but while the CEE countries, and formal implementation have been extensively researched, the SEE countries and practical implementation have not.

Taking this into consideration, I have decided to pursue this as the topic of my master's thesis in the field of European Studies at the University of Gothenburg. The research aim of the thesis is to analyse what roles non-state actors and transnational networks play in practical environmental policy implementation in SEE countries. By analysing this, the paper will also contribute to the discussion on how Europeanization contributes to the greening of domestic policies. Below you find name, title, and contact details to my supervisor.

Bearing this in mind, I have concluded that in the capacity of your position, you have expert experience on the issues of practical environmental policy implementation in the SEE-countries. With your expert experience in this area and familiarity of working with state and non-state actors, I am convinced that your views could contribute to my thesis, and within this research field. I would require no more than 45 minutes of your precious time for an interview, and I am very flexible regarding the timing of an interview and the method of communication, we could talk via phone, Teams, Skype, Zoom or any other video conference platform. I understand that you have a very busy schedule but I would be grateful if we could conduct the interview during the month of March if that is possible.

In case you are interested in contributing to my study, please answer this email and let me know.

I would be extremely grateful for your interest in my study and I appreciate your consideration.

Sincerely,  
Marko Stankovic