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Twenty Years of Malta's EU Membership: The Impact
on Maltese Environmental NGOs

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The first part of the document discusses the importance of maintaining accurate records in a business setting. It highlights how proper record-keeping can help in identifying trends, making informed decisions, and ensuring compliance with legal requirements. The text emphasizes that records should be organized, up-to-date, and easily accessible to relevant personnel.

Next, the document addresses the challenges associated with data management. It notes that as businesses grow, the volume of data increases significantly, making it difficult to store, manage, and analyze. The text suggests implementing robust data management systems and protocols to address these challenges effectively.

The third section focuses on the role of technology in modern business operations. It discusses how various software solutions, such as CRM, ERP, and data analytics tools, can streamline processes, improve efficiency, and provide valuable insights into business performance. The text encourages businesses to embrace technology and invest in training for their employees to maximize the benefits of these tools.

Finally, the document concludes by emphasizing the importance of continuous learning and adaptation in a rapidly changing business environment. It suggests that businesses should regularly evaluate their strategies, processes, and technologies to stay competitive and successful in the long run.

Twenty Years of Malta's EU Membership: The Impact on Maltese Environmental NGOs

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Abstract

In this study, the researcher analyses the impact of EU accession on Maltese Environmental Non-Governmental Organisations (ENGOs), twenty years after Malta, the smallest EU-member state, joined the Union in 2004. In the run-up to EU accession, the environment was often seen as an area which would benefit from Malta's EU membership, especially since Malta had a lack of environmental legislation and enforcement. Not surprisingly, Environmental NGOs (ENGOS) supported Malta's EU accession. ENGOS are major protagonists in environmental politics in Malta. Their activism covers different areas, though some issues - most notably land development, and hunting of birds - are more visible and contentious in the public sphere. Environmental protest is also one of the most common types of protest in Malta. In this paper, the researcher investigates the impacts of Malta's European Union (EU) accession on Environmental NGOs (ENGOS) through a sociological perspective, following two decades of Malta's accession. For this purpose, the activism of ENGOS in relation to Malta's EU accession was analysed, through political process theory and a social constructionist approach which engaged with the interpretations of the same ENGOS on the issue under analysis. For this purpose, primary data was collected through elite interviews with representatives from Malta's major ENGOS. The main research question of this study is "how do ENGOS interpret the impacts of the EU, 20 years after Malta's accession?" The study is a follow-up of a similar study by the same author following ten years of Malta's EU membership.

Keywords:

Europeanisation, Environmental Movement, Political Opportunity Structure, Environmental NGOs, Social Movement Impacts

Introduction

In this study, the researcher analyses the impact of European Union (EU) accession on Maltese Environmental Non-Governmental Organisations (ENGOS), twenty years after Malta, the smallest EU-member state, joined the Union in 2004.

In the run-up to EU accession, the environment was often seen as an area which would benefit from Malta's EU membership, especially since Malta had a lack of environmental legislation and enforcement. Not surprisingly, Environmental NGOs (ENGOS) supported Malta's EU accession.

ENGOS are major protagonists in environmental politics in Malta. Their activism covers different areas, though some issues, most notably land development and hunting of birds, are more visible and contentious in the public sphere. Environmental protest is also one of the most common types of protest in Malta (Briguglio, 2022).

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Some environmental issues which concern ENGOs have a dimension which are at once international and European; the hunting of birds is a case in point. It is covered by comprehensive European legislation, particularly the Birds and Habitats directives, but is also very much influenced by antagonisms in Malta's polity, which also included a referendum in 2015.

Some other environmental issues involving Maltese ENGOs are characterised by contention which is more visible at an EU level, such as climate change, which, though gaining increased visibility in Maltese society, has, until recently, not been a prominent issue at national level.

On the other hand, environmental issues related to the development of land are highly visible in Malta's public sphere, because of Malta's small geographic land area, and high population density, and are mostly debated in the arena of national politics.

There are also other issues which, though important from an environmental perspective and also covered by EU legislation, are less characterised by contention by the environmental movement. These include waste and water management.

In this paper, the researcher investigates the impacts of Malta's EU accession on Environmental NGOs (ENGOs) through a sociological perspective, following two decades of Maltese accession.

For this purpose, the activism of ENGOs in relation to Malta's EU accession was analysed, through political process theory (Edwards 2014; Johnston 2014), and a social constructionist approach (Braun and Clarke 2022; Hannigan 2014), which engaged with the interpretations of the same ENGOs on the issue under analysis. This research involved the use of primary data which was collected through elite interviews with representatives from Malta's major ENGOs.

The main research question of this study is *"how do ENGOs interpret the impacts of the EU, 20 years after Malta's accession?"*

The study is a follow-up of a similar study by the same author following ten years of Malta's EU membership (Briguglio 2015). This study had concluded that:

"EU accession has generally enhanced the empowerment of Maltese ENGOs, but this process was uneven. It was also combined with other over-determining factors and depended on different issues and on different types of ENGO. ENGOs had greater access to opportunities that were unavailable prior to Malta's EU accession. The construction or otherwise of hegemonic formations linked to the empowerment of ENGOs was related to sensitizing, procedural, structural and substantive impacts. Empowerment through hegemonic formations was not common, but ENGOs were successful in constructing nodal points and in benefitting from different types of impacts, especially procedural and sensitizing ones. As Malta enters its second decade of EU membership, sensitizing impacts are increasing in prominence" (p.18).

The next section of this article reviews relevant sociological literature. This is followed by the research design, findings, and discussion respectively.

Literature Review

Political Opportunity Structure

Political Process Theory, an influential perspective in the study of social movements, focuses on political opportunity structure (POS), which can be defined as "features of regimes and institutions that facilitate or inhibit a political actor's collective action and to changes in those features" (Tarrow and Tilly 2009, cited in Edwards 2014 p.83).

In sum, POS tries to explain how the mobilization and impacts of social movements are influenced

by structural factors, for example, whether they are active in a democratic or authoritarian polity. This approach has also been used specifically in the analysis of environmental movements (de Moor and Wahlström 2022).

Other perspectives on social movements explain their mobilization and impacts on factors such as resource mobilization, and framing. This, in turn, influenced POS theorists to adopt a more flexible theoretical approach which also gives due space to factors such as cultural factors and agency, in what is sometimes referred to as 'contentious politics' (Tilly and Tarrow 2015). At the same time, both POS and contentious politics have been criticised for being 'catch-all' theories with a lack of empirical precision (Opp, 2009). With regards to this paper, this criticism is taken into account both methodologically, by giving considerable importance to the actual evidence collected during the research process, and also theoretically, by giving due importance to structure, agency, and their respective interaction.

In this study, the Political Opportunity Structure related to Malta's EU membership is being considered. ENGOs are considered to be social movement organisations.

Europeanisation of Environmental Politics

The process of Europeanisation (Börzel and Risse 2000) can be seen as an influential factor within the EU political opportunity structure. In the 2015 paper, the researcher had theorized the relationship between ENGOs and Europeanisation as follows:

"ENGOs within the EU attempt to influence both EU institutions, national governments and the public. National governments tend to be bypassed when the EU is seen as a better gateway to achieve environmental demands. In turn, the EU can enhance the empowerment of ENGOs through the creation of hegemonic formations involving nodal points related to ENGO discursive constructions" (Briguglio 2015, p.7).

This same study had also referred to dominant discourses within the EU, as well as to the process of institutionalisation, which can help especially moderate ENGOs to achieve their goals, though it can also help transform the same organisations.

Often, Europeanisation is seen as a top-down process characterised by policy changes in line with EU legislation, such as the adoption of European directives, as well as the spreading of values and norms within the bloc. This has been analysed in relation to environmental policy (Börzel 2008), and some have referred to the "European environmental conscience" (Hoerber and Weber, 2022 p.1).

Europeanisation can also be a bottom-up process, where, for example nation states and social movements influence policy-making at an EU level. This can take different forms, such as the adoption of new policies or the avoiding of policies in place due to what are deemed as justified exceptional characteristics.

Europeanisation can also be seen as a horizontal process, for example through 'soft power' techniques such as policy transfer in terms of the Open Method of Coordination. In turn, these three directions (top-down, bottom-up, horizontal) can co-exist, they do not necessarily take place at the exclusion of each other.

The environment is an area covered extensively by EU policymaking. Examples include climate change, air quality, waste management, and energy policies. There may be a difference, though, in terms of implementation of such policies within different nation states.

Empowerment of ENGOS

If conceptualised within the theory of Political Opportunity Structure, Europeanisation could be seen as a potential influence on the empowerment of ENGOS, where, as explained above, it can potentially act as a gateway for access to legislation, support, resources and sanctioning as per the goals of the ENGOS in question. In this regard, ENGOS can resort to action at a European level particularly when this is covered by EU legislation and is not effective at a national level. ENGOS can also ride on the EU's top-down approach of policy-making, and thus lobby for member states' adoption or implementation of EU legislation.

ENGOS can also be empowered through a range of impacts, as per social movement literature (Giugni 1995; Van der Heijden 1999; Rootes 2007; Carter 2018). In the book on environmental politics, Carter (2018, p.171) articulates these impacts, of environmental pressure groups, as follows:

Type of Impact	Explanation
Impact on Identity (internal)	"Politicisation of membership/supporters of group"
Sensitization (external)	"Changes in the political agenda and public attitudes"
Procedural (external)	"Access to decision-making bodies"
Structural (external)	"Changes in institutional or alliance structures, such as the creation of an environment agency or shift in attitude of parties"
Substantive (external)	"Material results: closure of a nuclear plant or new pollution legislation"

Table 1: Types of impact of environmental pressure groups

In relation to Political Opportunity Structure, these impacts might be influenced by Europeanisation, but they may also be influenced by other factors, such as national societal and political characteristics. Indeed, in any Europeanisation study, it cannot be assumed in advance that social change is automatically EU-related.

Environmental Politics in Malta

Environmental politics in Malta has been influenced by EU accession, but it is characterised by national political processes such as the influence of lobbies in matters such as construction (Briguglio 2012), and hunting of birds (Briguglio 2015), as well as the dominant two-party system (Harwood 2022; Fenech 2022), and the dynamics of hyperpersonal politics in a small-island state (Corbett & Veenendaal 2018). On the other hand, governance is multi-levelled (Baldacchino 2015), resulting in opportunities beyond the nation state for ENGOS.

Hence, ENGO activism is conceptualized as taking place at both national and European levels, depending on the issue and organisations involved, and the respective policy-frameworks. Subsequently, this study verifies how ENGOS interpret the impact of EU accession.

Research Design

By means of a qualitative framework, this researcher was interested in analysing how ENGOS interpret the impact of the EU on their activism. This hermeneutic approach has been adopted elsewhere with respect to European environmental politics (Kuenzer 2022).

Unlike in the 2015 study, in this study the author did not adopt a case-study approach, nor were hegemonic formations, as informed by discourse theory, the focus of the research. This time around, the methodological framework was informed by reflexive thematic analysis (Braun and Clarke 2022), wherein the researcher tried to see which issues, ideas and processes are socially constructed by the ENGOS themselves, through the phenomenological understanding of their activism.

Consequently, this research project made use of elite interviews (Burnham et al. 2004). The elites in question were from Malta's seven major Environmental NGOs, which, despite their differences (Briguglio 2015), are currently and consistently identifying themselves together as Malta's environmental NGOs for example through joint proposals of policies and joint campaigns, a recent one being the opposition towards redevelopment in Comino, a mostly unbuilt island in the Maltese archipelago (The Malta Independent, 2023). One of these organisations, Moviment Graffiti, is not purely an ENGO, as it is involved in other matters such as gender equality and workers' rights. However, it is a major player in ENGO activism as per its participation, and often leading role, in various ENGO campaigns. It is also organisationally more in synch with grassroots activism, rather than a more professionalised approach.

All these ENGOS featured prominently in the 2015 research project about the empowerment of ENGOS ten years after EU accession. However, some ENGOS which featured in that respective exercise did not feature in this one, either because they are no longer active, or because they are not clearly associated with the bloc of seven ENGOS in question. Besides, for practical purposes, not all NGOs involved in environmental issues could be included in this research – the author's experience and research in the field determined the choice of organisations which have been consistently active and publicly visible over the past two decades.

Each ENGO was asked to nominate a representative who would respond on its behalf, and all were given the option to remain anonymous. All respondents opted to use their real personal and organisational names. The ethics process was duly approved by the University of Malta research ethics set-up. All ENGOS accepted to be interviewed face-to-face, bar one ENGO which sent its replies in writing. All ENGOS nominated prominent figures to represent their case in these interviews, as can be seen in the following table:

ENGO	Representative
Birdlife Malta	Mark Sultana
Din l-Art Ħelwa	Simone Mizzi
Flimkien Għall-Ambjent Aħjar (FAA)	Astrid Vella
Friends of the Earth Malta	Martin Galea Degiovanni
Moviment Graffiti	Andre Callus
Nature Trust	Vince Attard
Ramblers Association Malta	Ingram Bondin

Table 2: ENGO representatives interviewed in this study

The interviews were carried out between December 2022 and February 2023. Data was coded and organised in themes, in line with the previous argument on the methodological approach of this study. Five themes were developed, based on the author’s reflexive interpretation of the responses of the seven ENGOs in relation to the research question. The findings were driven by these themes, and in turn, this was interpreted through a theoretical and conceptual lens as presented in the literature review.

Findings

A number of codes emerged from the interviews with ENGOs. These are the following:

Codes
Disillusionment with EU
ENGO differences
ENGO Impacts
EU as ‘big brother’
EU Empowerment
EU Impact
EU Impacts on Activists
EU institutionalisation
Legislation vs Implementation
Multilevel Governance
National-only activism
New Higher Expectations
Small State characteristics
Small State networks

Table 3: Codes which emerged from interviews

In line with the practice of thematic analysis, these codes were organised and synthesized into themes. Thus, five major themes were reflexively constructed through the data, in relation to the research question.

Themes
EU Impacts
Organisational Impacts
ENGO Impacts
Governance Impacts
Small State Impacts

Table 4: Themes

Each theme is elaborated upon below. At this stage it is important to clarify that it was not always so easy to clearly distinguish between themes. For example, the sharing of ideas and practices sometimes overlap, though they do not mean the same thing.

Theme 1: EU Impacts

EU impacts referred to by ENGOS include changes in legislation and policy, as well as the sharing of ideas. At the same time, ENGOS expressed that Malta could do better and some believed that Europeanisation could go further. Some ENGOS actually consider the EU to be a benevolent 'big brother', with Nature Trust and Birdlife Malta actually pronouncing this terminology.

In the words of Din l-Art Ħelwa, through EU accession, "networking and communication has become much easier. There are structures that assist NGOs, ensure they get training, give them opportunities to travel to other NGOs and conventions, and ... there is the ability to have a constant flow of thought, even though sometimes it is still slow to get answers."

According to FAA, "EU accession has strengthened our arm, given power to our elbow," even if this may have had very little effect on the ground. Malta's EU membership opened up various opportunities for ENGOS, and even to activists, such as access to funds, networks, affiliations, volunteers, tools, and best practices. Nature Trust observed that certain projects and improvements would have not taken place without Malta's EU accession, and along the same lines, Birdlife Malta observed that as regards the environment, "definitely, without the EU, and all countries do as they please, the situation would be worse".

Moviment Graffiti was less sure in this regard. Even though it acknowledged the direct change in environmental legislation, it added that it is difficult to say if certain social changes would still have taken place without EU accession, or whether they were actually determined by the accession process.

ENGOS also engaged critically with the concept of EU impacts. For example, the EU is seen as being technocratic, as favouring one-size-fits-all policies, and at times, even as being detrimental to Malta's environment, for example through the funding of road-building, as highlighted by Moviment Graffiti, and the liberalisation of plastic bottles, the latter referred to as a "huge step backwards" by Friends of the Earth.

Some ENGOS are less influenced than others by the EU, with some (Ramblers Association Malta, FAA, Moviment Graffiti) avoiding the EU set-up altogether. Indeed, FAA and Moviment Graffiti expressed that Malta's EU accession did not have much impact on their respective organisations, and that Europeanisation was not felt on the ground, despite certain common factors.

ENGOS such as Ramblers Association Malta also opined that the EU has also been impactful in terms of the raising of environmental expectations in Malta. Paradoxically, this means that on the one hand there is more pressure for the government to implement EU standards, but on the other hand there is also disillusionment by some ENGOS with Malta's failure to reach expectations. Notwithstanding this, none of the ENGOS has been impacted negatively by the EU, and most felt a general sense of empowerment, even if at times this is being perceived as not being felt in everyday life or within specific organisational structures. Nature Trust and Birdlife Malta queried why certain ENGOS do not seek the benefits of EU membership, when there are equal opportunities for all.

Theme 2: Organisational Impacts

These impacts are very much in line with the concepts of internal impacts and structural impacts referred to in the literature review. They are related to Malta's EU accession in terms of the founding of ENGOs themselves, two of which were actually founded following Malta's EU accession, the professionalization of certain ENGOs as well as the opportunities, networking and sharing of practices of ENGO activists. The EU often played a major role with respect to professionalization and opportunities.

ENGOs differ in organisational aspects. For example, some are professionalised through the employment of staff and the management of nature sites, whilst others are more activist-oriented. Malta also experienced the birth of new ENGOs following EU accession, with Ramblers Association Malta actually identifying itself as part of the "new wave" of ENGOs.

As observed above, different ENGOs have taken different approaches to opportunities offered by the EU, considering it as "a blessing for us" (Nature Trust) on the whole, and as a bureaucratic burden that subjects you to its priorities, as Moviment Graffiti put it, for others, to be avoided not "in principle" but "for practical purposes".

Din l-Art Helwa, Nature Trust, Birdlife Malta, and Friends of the Earth have all opted for applying and receiving EU funds, apart from other funds which they receive, which vary from state grants to membership fees. Some of these ENGOs expressed a greater sense of confidence and proximity to EU institutions and ENGOs. Some ENGOs actually employ staff, with Birdlife Malta being the biggest employer and considering itself to be a net contributor to Malta's economy. Some ENGOs also provide scientific expertise to the authorities, and they are also "careful on how to come across" (Birdlife Malta).

At the same time, it was emphasised that the funding received from the EU pales in comparison with that of lobbyists. As Friends of the Earth put it, "considering the budget that lobbyists have in Brussels compared to the budget that all NGOs put together, it's scary, although I'm sure that there is some – I mean, they do listen to what Friends of the Earth and the other big NGOs are saying".

On the other hand, FAA, Ramblers Association Malta and Moviment Graffiti are more reliant on membership fees and donations. They are also more likely to be engaged exclusively in national activism. Still, this does not mean that they have no links with EU politics. Examples in this regard include activists travelling, informal networks and speaking up on certain issues.

Theme 3: ENGO impacts

ENGOs were asked about their effectiveness. Their replies were interpreted through the external impacts framework referred to in the literature review (sensitizing, procedural, structural, substantive).

Sensitizing impacts include educational programmes (e.g. Nature Trust's eko-skola), awareness raising (e.g. the referendum on hunting, recognition of built heritage as well as awareness on various development issues), as well as helping make the public aware that they have a voice. With regards to the latter, the engagement with communities and other organisations are deemed as being of significant impact, particularly by Moviment Graffiti.

Procedural impacts include access to information, participation in public consultation, lobbying, forming coalitions, as well as resorting to legal action. Some cases actually lead to substantive

impacts. Some ENGOs also give expert advice to national and EU institutions.

Structural impacts include influencing the formation of other ENGOs, government entities and planning structures, management of various sites, as well as broadening the remit of the latter, for example in marine areas. In the words of Friends of the Earth, as regards environmental policy in Malta, “probably, they can do much worse if they knew we weren't around, probably”.

In this regard, Moviment Graffiti referred to the influence of the “people” – rather than to the process of Europeanization, when they organise themselves and have an impact on environmental politics in Malta.

Substantive impacts include the impacts of site management, the protection of habitats, the restoration of historic sites, as well as specific victories which blocked specific development projects. ENGOs have also won the right to juridical interest as well as the introduction of legislation such as the climate change bill.

The agency of ENGOs plays an important role in their respective impacts, and, in turn, not all of these are necessarily related to Malta's EU accession. For example, the environmental politics of land development are mostly carried out within national and local levels.

Theme 4: Governance Impacts

Governance, which refers to how decisions are taken and implemented, and at what levels, featured prominently in the interviews. In this regard, EU accession provided a new layer of governance in Maltese politics. On a rather optimistic tone, Nature Trust stated that through EU accession:

“we started seeing, also, comparing how the EU works, we got experience from other EU NGOs as well, through our channels, so we could see the potential of how we could do. It also helped us because, in a way, we had someone to refer to. Before, it was just, you know, NGOs and government, now we could compare, also, to EU legislation, we could get support.”

At the same time, ENGOs acknowledged the importance of multi-level governance and Europeanisation in Maltese environmental politics, but they also emphasized the influence of, for example the construction lobby, the economic structure, and as FAA put it, “politician cronies”.

Hence the EU level of governance, though often being top-down, did not necessarily determine governance in Malta, particularly in areas such as land development and in terms of implementation, for example on the hunting of birds.

Besides, in the words of Ramblers Association Malta:

“in the EU you always have these three different institutions which are playing together, right? You have the national states, Parliament and the Commission, right? Very often I get the impression that the Commission, given that it is a bit more technocratic and more disconnected from the democratic process, which tries to push towards a certain direction, and Parliament, which is very often ineffective – but not ineffective because it is not effective, but because it is mobilized by anti-environmental movements, right?”

FAA also referred to instances where even in:

“areas where the EU does have a remit – which is, for instance, air pollution, our complaints are submitted, the EU sends them back to the responsible authority, and unfortunately, it is *fobbed* off by patently false claims by the competent authority, like – I will quote specifically when we highlighted the fact of Malta's pollution count going well over the maximum rate.”

The EU bureaucratic process was also detrimental to ENGO activism and sometimes seen as a waste of time. A sense of disillusionment with Malta's EU accession in relation to the environment was expressed by Ramblers Association Malta, especially when compared to initial enthusiasm during Malta's accession process. FAA expressed the "extremely disappointing" results of their lobbying against Malta's land rationalisation process. At the same time, the high expectations brought through EU accession also helped put the Government on edge vis-à-vis legislation and implementation.

On the other hand, in some interviews it was argued that sometimes ENGOs did not always appreciate or understand the EU policy process, for example with regard to the remit and competency of certain policies.

Theme 5: Small State Impacts

Malta's small size often featured in replies by ENGOs. It is interpreted primarily as increased access of social networks within a society – in synch with Corbett and Veenendahl's (2018) definition of hyperpersonal politics.

In this regard, Malta's status as a small island state means that ENGOs have considerable access both to the general public, for example in relation to campaigning and educational initiatives, but also with respect to national and European elites, including Maltese elites such as Ministers and others who occupy top positions. For example, reference was made to a Maltese European commissioner who was accessible informally during Maltese village feasts. In relation to Maltese Ministers, one respondent said that "I went to Cabinet, and half of them were with me at school".

Thus, smallness enables contact between social actors, making it easier for ENGOs to access domestic political actors who sit in EU institutions and national governments. Whilst this can enable ENGOs to influence such actors, the opposite can also happen, for example if political actors exert pressure on ENGOs and activists.

Malta's smallness was also articulated by respondents in terms of congestion and overdevelopment, but paradoxically it influenced a lack of implementation of environmental policy. This is because the island could act below the European radar of policy implementation. Still, the latter could be risky particularly if lobbyists from bigger countries refer to Malta's exceptions, such as the hunting of birds in Spring, to justify their own practices. Malta's population density was also related to various environmental problems.

Discussion

The main research question of this study was "how do ENGOs interpret the impacts of the EU, 20 years after Malta's accession?"

Themes were reflexively constructed through the interviews with Malta's seven main ENGOs, namely, EU Impacts, Organisational Impacts, ENGO Impacts, Governance Impacts and Small State Impacts. These themes show how the impact of the EU is mediated and constructed together with other impacts in which ENGOs are situated.

It was seen how the European Union adds another layer of governance, which provides opportunities for ENGOs. This has enhanced the empowerment of the environmental movement, but at the same time Malta has various realities, often related to its small-island state status, that are exploited both by Government and ENGOs in different ways in relation to opportunities and

threats to their respective claims. These include networking in a context of 'hyperpersonal' politics, where politicians are easily accessible, and exploiting Malta's small size to avoid implementation as much as possible given that it has a minor impact on the EU on a macro-level.

Some NGOs are highly dependent on EU resources, which, in turn, have helped the respective organisations become professionalised. Nature Trust, Birdlife Malta, Friends of the Earth, and Din l-Art Ħelwa are making most use of EU opportunities. The first three NGOs mentioned here remarked that other NGOs are not taking up EU opportunities, referring to the availability of funds, resources, programmes, and other opportunities

On the other hand, other NGOs such as Moviment Graffiti and FAA have adopted routes which are much less related to Malta's EU membership, and at times focus more on their grassroots relationships. Moviment Graffiti, though acknowledging the contribution of EU opportunities on certain NGOs, remarked that EU opportunities can actually be counterproductive if, in practical terms, they hinder the strategy of the organisation. Ramblers Association Malta referred to disillusionment vis-à-vis the high environmental expectations brought about through Malta's EU membership. This sense of disillusionment is also creeping into other NGOs.

In this study, Europeanisation featured quite prominently as a top-down process influenced by Malta's EU membership, which, in turn can be interpreted as a political opportunity structure. At the same time, it is uneven, and there is a sense of agency amongst NGOs, some of which pragmatically opt not to make use of EU opportunities.

The Political Opportunity Structure of Malta's EU membership is very important to understand the strategies, repertoires, discourses and resources of NGOs, but it cannot explain everything, especially in relation to issues which are more overdetermined by national political opportunity structures, such as land development.

This study also confirmed that different environmental issues are impacted differently by EU accession. Climate change, the Common Agricultural Policy, and Access to Information feature prominently in the political process at an EU level, and this has quite an impact on policy-making in Malta. Similarly, the hunting of birds is covered by EU legislation, but is very much subjected to politics in the national arena, where the respective environmentalist and hunting lobbies jockey for influence with respect to the major political parties, whilst also relying on their European allies for support. On the other hand, the development of land, is mostly played out a national level.

European politics were often seen as being influenced by big lobbies, and Malta often used its 'small state' status to try and avoid certain policy changes. Nevertheless, Maltese legislation was often seen as being sufficient on paper, but insufficient in terms of implementation, with some EU policy, for example on Environment Impact Assessment being singled out for not really being effective.

From an ideational perspective, the development of a European conscience can be seen to be in place, for although not all NGOs have been Europeanised to the same extent, critique of environmental politics in Malta is often articulated through an EU yardstick, where expectations of European standards are not obtained.

Hence, this study shows that two decades after Malta's EU accession, the impacts on NGOs were very similar to those analysed a decade earlier. It can also be noted, however, that despite the enhancement of empowerment of NGOs through EU accession, disillusionment about the same process is also creeping into certain NGOs, particularly those which are active exclusively at a national level.

Another important conclusion of this study is that despite its analytical influence, Europeanization cannot explain all social and political changes. The agency of ENGOs, as well as social changes such as influence of social media for campaigning, need to be taken into account. At the same time, it is often difficult to distinguish between what is Europeanized and what is not, though some changes, such as access to EU funds, are clearly more identifiable than others.

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