

Interests in the Supranational: Interest Group Lobbying in Parliament Post-Lisbon

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Abstract

While the European Commission is the primary target of interest groups seeking to shift EU policy, since the Lisbon Treaty the European Parliament has become an increasingly viable lobbying venue. The presence of multiple access points pose a challenge for interest groups' strategies, for the two institutions are dramatically different in both their composition and informational needs. Not all interest groups would choose to spend resources and energy to lobby multiple places, and thus there are strategic motivations behind choice of venue. There are widespread theories concerning the behavior of organized interests in Europe, but to date there have been few large-scale, empirical analyses of lobbying patterns in the EU. This paper uses a unique database of 4,316 interest groups to test how a number of group characteristics – namely resources, type, representation, and policy interest – predict choice of lobbying venue. While an initial cut at broad patterns of lobbying, the findings suggest while there is some support for prior conceptions of venue-shopping, current theories of lobbying in Europe should be rethought.

1 Introduction

The European Union is an especially fruitful, albeit complex, context in which to study interest groups. While there is an extensive literature on lobbying in the United States, scholars have more recently begun to move beyond descriptive studies of organized interests in Europe to empirically test theories of group behavior. Over the past 50 years,

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European integration and the strengthening of EU institutions have led to a large expansion in the number and types of interest groups. Thousands of groups lobby the EU on a wide variety of policy areas that range from fisheries to broadband, education to pharmaceuticals, and human rights to trade.

I define interest groups broadly in this paper as any organized group of actors that pursue their political interests (policy preferences) through a wide range of interactions outside of formal, elected office (Beyers et. al. 2008). The types and characteristics of groups that lobby at the EU level vary widely – groups can be business or other economic interests, NGOs, think tanks, legal groups, lobbyists, or transnational organizations. Groups are large or small, well-endowed or resource-poor, represent different populations or countries, and advocate their preferences in all policy areas of the EU.

Interest groups must also select their lobbying strategies. This study focuses on groups that choose to lobby supranationally at the institutions of the EU, and analyzes the specific choice made by certain groups to lobby the European Commission, the European Parliament, or both. While the Commission is the primary target of interest groups seeking to shift EU policy, many highlight that the European Parliament has become an increasingly viable lobbying venue (Kerremans and Princen 2008, Coen 1997, Beyers and Kerremans 2007). Both places give interest groups access to the policymaking process, but the two institutions are dramatically different in both their composition and informational needs. As a result, interest groups must develop strategies to successfully navigate multiple access points in the EU. Not all interest groups would choose to spend resources and energies to lobby multiple venues, and thus there are strategic reasons to lobby one place over the other.

There are two widespread theories in the literature on organized interests in the EU, namely a theory of resources and a theory of access goods. Resource theory predicts that well-endowed groups are better able to lobby multiple places or their preferred venue, while the theory of access goods argues that resource dependency (in the case of the EU, relating to information asymmetries) provides the strategic rationale for lobbying. Until now, the majority of scholarship on this topic has examined small subsets of the interest group population, and which groups lobby where and why is a puzzle empirically unresolved by a large-N study. Furthermore, there is a good deal of variation that isn't adequately explained by existing theories.

Assembling data on the universe of EU interest groups is no easy task. As part of a larger project on interest group strategies, I initially constructed a database of interest groups using data taken from the Commission and Parliament Registers. While there are advantages and disadvantages to using public registers, the data that does exist can still provide a wealth of knowledge about broad patterns of interest group behavior. I argue that existing theories fail to take into account that different combinations of group-specific characteristics of interest groups could drive the strategic choice of lobbying venue. I use a novel dataset to explore how prior explanations of resources and type (to proxy for information), as well as representation and policy, affect ultimate choice of lobbying venue for 4,316 interest groups. In doing this, This is the first step of a larger research agenda, in which I hope to both test existing theories and extend the analysis to probe deeper into how more other group characteristics affect lobbying.

The opening up of additional access points has implications for how scholars and policymakers think about interest group lobbying in the European Union. Some groups may benefit by the opening up of new venues, in that they can contribute their policy information and preferences more easily. Especially considering the commonly argued pro-business bias of the Commission toward economic groups, the option of Parliament might be an attractive one for citizen groups or NGOs. On the other hand, the complex system may hinder certain types of groups in developing effective lobbying strategies (Dur 2008), or give twice as much access to the same powerful groups. Both the strategies of horizontal venue shopping in supranational settings and increased lobbying at the only EU institution that is directly elected have significant implications for understanding how to use democratic processes to balance the influence of organized interests.

My empirical results suggest mixed support for hypotheses regarding resources and type, but also show that there are other important predictors of interest group strategy. In the first section I outline the challenge of multiple access points in the EU and the contextual implications, and in the second section I discuss current theories, their weaknesses, and my proposed contribution to the analysis. In the third section I estimate a multinomial choice model describing the probability of lobbying as a function of group characteristics. In the fourth section I presents the results and broad patterns of lobbying, and the final section concludes.

2 The Choice Between Venues: Multiple Access Points in the EU

The hybrid political system of the EU and its expanding influence on member states' national policy has created a unique system of lobbying at the supranational level. Its complex structure means there are multiple institutional access points (or political opportunity structures that allow groups the means to influence policy (Princen and Kerremans, 2008)) for groups to target. The access points in the EU are the institutions with binding authority in the legislative process – the European Commission, the European Parliament and the Council of Ministers.¹ But how is the concept of multiple access points different in the EU than in other lobbying systems? In the United States, for example, there are also multiple institutions to lobby, namely those responsible for legislation – the Senate and the House of Representatives (and potentially the executive branch).

However, there are two features of the EU system that make lobbying multiple venues different – first, the lack of campaign finance alters the “currency” of lobbying, and second, EU institutions have very different mandates. Elrich (2007) argues that the more access points in a system, the cheaper lobbying will become as institutions compete for lobby benefits (and drive the price down). While this may be the case in the United States, there is no campaign finance in the EU, instead, groups compete to provide information. Information is currency, and overall lobbying success is dependent upon both the types of policy relevant information that groups can provide to the various institutions of the EU and the informational needs of the institutions themselves. Groups also have varying types of currency, for they each provide various types of information, making lobbying much more complex. In addition, the political system of Europe is different. In the United States, politicians are of roughly equal standing in terms of their mandate and types of representation (whether it be party or state), and both houses play a fairly equal role in legislation. EU institutions have very different mandates, with both bureaucrats and politicians representing national and supranational interests, and vie for power in policymaking. As a result, interest groups face a much more complex choice when strategically choosing the potential lobbying venue(s).

¹While the Council of Ministers (and also the ECJ) is an access point, it has a different relationship with lobby groups and is less likely to be lobbied directly (in fact, lobby groups target national institutions and groups first, leading the Council to be called the group of “lobbied lobbyists.” (Spence 1993) As this channel is much more noisy and less transparent, I don't address this access point here.

In general, since the modus operandi of the EU is consensus-based decision making, the EU is more likely than the US to come to some sort of policy conclusion and policy change is more likely (Mahoney 2008). The institutions of policy change I focus on in this paper are very distinct. The Commission is the legislative arm of the EU, drafting all policy and submitting proposals to the Parliament and Council of Ministers, and holds the right of legislative initiative in most policy areas (Hix 2008, Waratjen and Wonka 2004). European policymakers lack information on the costs/benefits of policies, as well as popular preference for policies, and develop networks to access this information (Beyers and Kerremans 2007, Pollack 1997). As a result, the Commission actively cultivates interest group activity in order to obtain technical information to legitimately draft policy (Bennett 1999, Bouwen 2004). Groups lobby the Commission at the draft stages of lawmaking to ensure their interests are protected or advanced. Because of this role, it has historically been the primary focal point of interest group lobbying.

However, the European Parliament is an increasingly salient access point. It can call for legislation to be drafted by the Commission, create amendments, and make final decisions on policy under the codecision procedure with the Council of Ministers (Hix 2008). It is the only directly elected body of the EU, composed of MEPs who are elected within their respective member states. Since MEPs' existence depends on national voters, they seek contact with groups that can provide them with information about broad support for policies. Beyers and Kerremans (2007) note that MEPs are power multipliers who need to attract groups that can support their policy initiatives, so they in turn can pressure bureaucrats. The Parliament relies less on expertise and technical information, and more on information about the European perspective on (and potential reception to) the detailed proposals drafted by the Commission (Waratjen and Wonka 2004).

Furthermore, the Parliament has steadily increased its formal powers and influence through the various treaties of integration over the past 20 years. In particular, the adoption of the Lisbon Treaty in 2009 extended the Parliament's influence by increasing the policy areas decided by codecision and giving it the power to approve or reject the EU budget in its entirety. Under the Lisbon Treaty it also gained the power to ask the Commission to enact new legislation. While serving a different function than the Commission, it is an active participant in the policy process and offers interest groups an alternative venue. Waratjen and Wonka (2004) also argue increased qualified majority voting has diminished the national veto, and Parliament is now an attractive alternative for groups

unable to achieve their domestic objectives – for example, an interest group from a small member state with less voting power in the Council may find success lobbying Parliament over its government if MEPs share similar policy preferences. In fact, the Parliament is even credited with the increased involvement of more diffuse interests (Beyers, 2002).

Overall, the political strengthening of the European Parliament has led to an additional and increasingly viable access point in the EU, and therefore the development of different strategies for different interest groups (Coen 1997). It is essential to consider how groups strategically choose where to lobby in this context. Should groups lobby every access point they can, or should groups spend all their time and resources on the venue at which they think they have the most leverage? Some argue that the specific nature of the EU dictates that interest groups *should* utilize multiple access points when lobbying — Mazey and Richardson (2001) write “promiscuity, rather than monogamy, is more rational interest group behavior.” Still others argue that while groups have multiple venues to lobby, they are unbalanced – Parliament is more limited in the actions it can take to affect legislation and is removed from the drafting of policy, and groups (especially with limited resources) may disregard the Parliament as a viable venue in favor of the Commission (Coen 2007). This question is currently unresolved in the literature, and motivates the analysis of this paper.

But taking a step back for a moment, why should we care about venue choice in EU lobbying? Ainsworth (1993) highlights that access points are essential for influence, and consequently the choice of lobbying arena is an important one for organized interests. The EU is significant because its complex level of codecision in policy provides interest groups with completely different lobbying options, the choice of which could determine ultimate influence.² Having multiple institutional access points could have significant implications for policymaking, but these mechanisms are underexplored. On the one hand, this could increase policy legitimacy and improve information transmission by providing new opportunities for different types of interest groups to be heard, thought to be especially relevant for citizen and public interest groups that represent civil society. Scholars have also argued multiple access points provide new opportunities for groups who are

²There is an important distinction to be made between access and influence – this paper does not try to measure influence, but looks at the choice of venue based on the rationale that while there can be access without influence, there would not be influence without access.

peripheral and weakly organized at the domestic level to use European venues to compensate for lack of influence domestically (Beyers Kerremans 2007), and that the involvement of a wide variety of actors is a way to govern in the absence of direct democracy (Woll 2006). Scharpf (1988) also argues that joint decision-making structures found in federalism are beneficial in that they can often shield political actors from interest group pressures. Yet on the other hand, increasing institutional access could have zero or negative consequences for policymaking. Many argue that groups must be organized and well-resourced domestically in order to lobby supranationally in the first place (Eising 2004), so it may be that the same interest groups have even more opportunity to lobby for their narrow preferences. In addition, multiple venues may diffuse and relieve overall pressure on single EU institutions.

Yet the state of lobbying is complex and difficult to properly track, leading to concerns regarding transparency and inefficiency in an already bureaucratic institution. In the case of the EU, these access points also expose different populations of actors within each venue to interest groups. The bureaucrats that staff the Commission are arguably more insulated, while the directly elected MEPs in Parliament could be naturally more accessible (and under more scrutiny). The topic of organized interests and how they affect democratic accountability is also an extremely salient one – very recently, no less than four MEPs have been accused of taking cash from undercover reporters posing as lobbyists in exchange for putting forth amendments for legislation on consumer protection (BBC News, March 2011). This scandal challenges the already debated conception of democratic accountability in the EU, and is driving a new round of discussions on lobbying reform. Mapping what characteristics of interest groups affect their strategies in navigating the venues of the EU is therefore increasingly important, for policymakers and interest groups alike.

3 Where to Lobby? Existing Theories and Current Puzzles

Thousands of interest groups lobby the European Union, but a lack of transparency makes it difficult to study broad patterns in group strategies and the extent of access to the various actors in EU policymaking. There are numerous case studies and conceptual papers on EU lobbying, but lack of systematic data on interest groups has made empirical work

challenging. Dur and De Bievre (2007), Mahoney (2007), Beyers and Kerremans (2007), and Bouwen (2004) in different studies chose to interview numbers (<150) of interest groups and officials, using self-reported measures of influence and case studies, to study coalition formation, access, and networking. The most notable large-N study was undertaken by Christine Mahoney (2005), who used an original dataset of 700 self-reported records of civil society groups from the now defunct CONECCS database.

While there is a lack of large-scale empirical work on group strategies, there are two established theories that are very prevalent in the literature on European lobbying. The first is the fairly intuitive and general resource theory of venue choice, that explains how monetary or other resources dictate group strategy, and the second is the theory of access goods, which is EU-specific in arguing that the various institutions have different informational needs and groups target accordingly. While these theories have promising and testable predictions, I argue there are two more important group characteristics that could predict lobby choice. I first outline the two theories, the empirical puzzle that indicates a new conception is needed, and the variables I add to the analysis.

3.1 Theory of Access Goods

Horizontal venue shopping is a rational choice made by interest groups as they target the EU institution(s) in which they have the highest probability of achieving their policy objectives, taking into account the various needs and demands of such institutions (Princen and Kerremans 2008, Mazey and Richardson 2001). The patterns of lobbying behavior that drive venue choice have been explained using the theories of resource exchange as it relates to the concept of access goods. Resource exchange assumes a level of interdependence between interest groups and those they target, and is based on informational needs and expertise, as well as credibility and reputation. Each actor offers something of value to the other – interest groups want access to information, agenda setting, and policymakers in order to achieve preferred policy outcomes of the constituents they represent (Broscheid and Coen 2007, Bouwen 2004, Mahoney 2007, Baumgartner and Mahoney 2008). In exchange for access, the EU institutions demand something in return.

According to Bouwen's concept of access goods, there are three categories needed by the respective EU institutions – expert knowledge for legislation (a priority for the

Commission), information about European encompassing interests (sought by the Parliament), and domestic encompassing interests (needed by the Council of Ministers). Lobby group success depends on politician demand for such resources (Dur 2008, Beyers Kerremans 2007), and these theories predict that groups will first target the institution for which they can provide the needed access good.

This theory argues interest groups must provide information to gain access to the policymaking process, and repeatedly in the literature scholars use group type as a rough proxy for the kind of information a group provides. Group type is often a dichotomy between business interests and citizen groups (NGOs), although in this paper I look at business groups, NGOs, and professional consultancies. Business groups and professional consultancies can provide technical and sectoral expertise from a set of narrow constituents. These groups are especially active in the policy drafting process (Dur de Bievre 2007), and the Commission is biased towards the kind of information such types can provide (Coen 1997). NGOs, on the other hand, provide information about broad topics that appeal to its diffuse supporters, and excel at putting issues on the agenda and mobilizing popular support – information that is useful to the directly elected and agenda-setting MEPs in Parliament (Dur and de Bievre 2007, Beyers 2008). As a result, many authors conclude that “weaker” (less economic) interest groups target the European Parliament because as an institution it wants access to issues that are highly relevant to public opinion. These groups are often represent civil society on topics such as the environment, social equality, or women’s issues (Kochler-Koch 1997). The access goods theory provides clear predictions about interest group strategy in venue choice. Thus the theory of access goods predicts that business groups’ optimal strategy is to target the Commission, and that on average NGOs are more likely to lobby Parliament.

3.2 Resource Theory

The second theory in the lobbying literature argues that resources (monetary or personnel) drive venue choice. Lobbying multiple venues requires resources, and the choice of multiple venues might depend on the endowment of the group. Lobbying activities involve staff members, travel, supplies, programs, and initiatives whose costs must be born by the lobby group. Groups draw on a number of sources for financial support, including its members, and many argue that resources directly impact lobbying (Dur 2008, Princen

and Kerremans 2008). As a result, well funded groups or groups that can rely on a large membership base could find it much easier to lobby at a second venue, and in general interest groups that are well-endowed can better develop multilevel strategies of interest representation (Eising 2004).

In addition, not all organized interests are created equal, and groups with more resources could be better able at securing access to the preferred lobbying venue. Groups composed of firms (opposed to individual members) are especially able to mobilize resources (Dur 2008), and traditionally the European Commission has been stereotyped as the forum for rich, business interests (Mazey Richardson 2001). A fitting example came during a recent dispute about copyright reform, in which Swedish MEP Christian Engstrom lamented "Welcome to the European Union, where the big business lobby organizations are calling most of the shots at the Commission, and where citizens are just seen as a nuisance to be ignored."³ As a result, we could expect to find groups who are well-endowed to either exclusively or in tandem target the primary focal point of lobbying that is the Commission.

Overall, these two theories feature prominently in the literature on European lobbying, and explain two important drivers of group behavior. But as Beyers (2008) notes, a number of studies rely too heavily on categorization to study interest groups – groups are NGOs or public/social movement organizations, business or economic interests, or trade associations or consultants – and assume many organizational and descriptive characteristics are common across types. This paper builds off a critique from Beyers, in that it is more useful to study generic features such as organizational format or interaction modes across groups.

3.3 The Puzzle

The dataset I compiled has over 4,000 groups, and includes information on a number of group characteristics. There is wide variation in the data, but dispersed fairly evenly across characteristics (it is not the case, for example, that all NGOs are systematically less well-resourced compared to their counterpart business interests). Approximately 43% of groups in my dataset are NGOs (and approximately 24% of those have a Brussels office),

³Wall Street Journal, 2011

while 48% are classified as business interests (and 38% of those have a Brussels office). Only 7.8% of groups are professional consultancies, but 42% of those have a Brussels office. With the exception of professional consultancies, who overwhelmingly represent mixed interests, groups represent European, national, or global interests to similar degrees across type.

The two theories highlighted are widespread in the literature on EU lobbying, and have a set of clear predictions. Yet if these theories are correct, we should see these broad patterns reflected in interest group behavior. Instead, a cursory glance at the data I collected shows that this is not the case. The data shows that, for example, approximately 70% of NGOs in the sample lobby *only* the European Commission while only 60% of business interests do. Also, groups that are well-endowed are more likely to lobby *only* the European Parliament, and only 15% of groups choose to lobby both. Furthermore, survey data outside my study also provides challenging evidence. In the 2006 Survey of Members of Parliament (Farrell et al 2006), for example, MEPs reported higher levels of contact from consumer and economic groups, opposed to environmental and women's groups. Figure 1 imagines a set of hypothetical data (what the two theories of resources and access goods might predict if true) and presents this next to actual data from my database, in order to visually demonstrate a disconnect between current theory and practice.

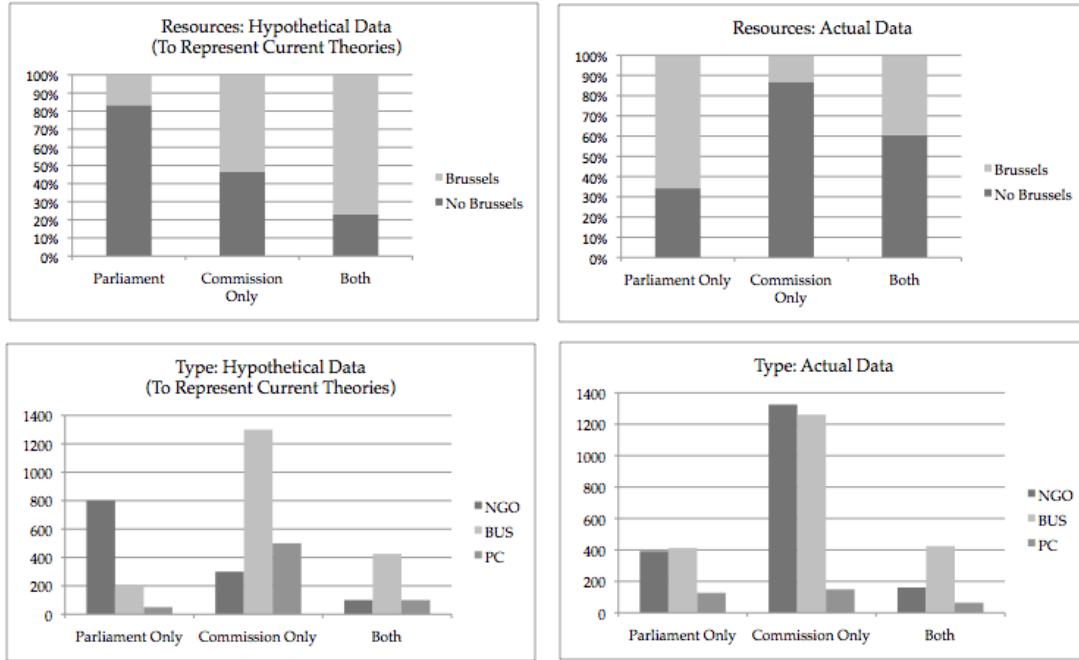


Figure 1: Failed Expectations

Overall, there is an immediate puzzle here – what explains this variation in lobbying strategy? It is clear that there is a divide between what scholars anticipate interest group behavior to be in Europe, and what group behavior actually is. There must be additional factors driving interest group choice of lobbying venue. While a number of studies have found evidence for these claims using case studies or small surveys, there has been no empirical analysis on a sample as large as the one in this paper, so many prior theories have yet to be widely tested. I argue that existing theories fail to take into account that different combinations of group-specific characteristics of interest groups could drive the strategic choice of lobbying venue. I use a novel dataset to explore how resources and type (to proxy for information), as well as representation and policy, affect ultimate choice of lobbying venue for 4,316 interest groups.

The explanatory variables of resource and type stem directly from the current literature, and I choose to add measures of representation and policy (two variables I believe drive interest group strategy) . As consensus drives the majority of EU policymaking, politicians and bureaucrats are highly sensitive to the issue of representation. However,

in the literature, the ultimate population a group represents (whether it be national interests, regional groups, European networks, etc.) is often collapsed into the "type" of interest group – all NGOs are assumed to have wider representation than more narrowly focused business groups. I argue that it is important to extract the concept of representation from type.

What type of predictions would we expect by including representation in the analysis? Empirically it's unverified in which direction the type of representation would affect lobby choice – Mahoney (2004) argues that the more actors an interest group represents, the more likely the Commission will listen, while Bouwen (2002) finds that European associations have greater access to the Parliament than national associations and individual firms/consultants. Meanwhile the Commission is supposed to represent "European" interests, while the Parliament consists of national representatives to the EU. Yet some argue groups that can claim to represent a broad range of member state interests are valuable to both the Commission and Parliament, both as an indicator of future policy success and a barometer for popular sentiment on policy issues (Princen and Kerremans 2008, Kohler-Koch 1997). Extrapolating, we would expect European interests to potentially lobby either, but for national interests to focus primarily on the Parliament (unless resources or issue area dictate otherwise). Including representation in the analysis will provide a finer and untested motivation of representation to group strategies.

The policy fields of interest to a group could also affect lobbying strategies. Stylized facts about the EU include that Commission caters to groups focused on economic or consumer affairs, while the Parliament listens to group concerns on social or environmental issues (Mazey Richardson 2001). Groups that represent various policy fields in the EU could systematically choose venues that are more likely to respond to their policy area. Yet the loci of policy changed significantly after the Lisbon Treaty, which extended the power of codecision and thereby the jurisdiction of the Parliament to 80 policy fields, covering everything from development to the environment. Issues of codecision used to receive the highest attention of interest groups (Kohler Koch, 1997). The effects of this on current strategies have yet to be theorized about, but one could imagine this reduces the need of groups to lobby one particular venue (and in fact, may increase the probability of lobbying both). There are few theories that address how policy shapes interactions, so including policy in the analysis should provide greater leverage as to whether this affects group strategy. By testing existing theories, and extending the analysis to other

group-specific factors, I hope to shed light on to what extent existing theories apply to the larger population of EU interest groups, and analyze which groups are taking advantage of multiple access points and why.

4 Data and Methodology

This paper uses a dataset compiled to measure how characteristics of European interest groups affect their propensity to lobby at the multiple venues of the EU, specifically the Commission, the Parliament, or both. Until recently, the scarcity of data on this topic focused scholarly attention to case studies, in-depth interviews, and surveys of various interest group populations (see review in Coen 2007). The advent of the European Transparency Initiative in 2005 and subsequent establishment of interest group registers for the European Commission and Parliament made publicly available current data on thousands of interest groups. The goal of these registers is to give the public access to information about which groups are influencing EU policymaking, their goals, and resources.⁴

Merging the wide range of sources on EU interest groups is difficult – registers and directories are created with different intentions, record different characteristics, and vary widely in the scope and number of groups recorded (Berkhout and Lowery 2008). I take a related approach to Wonka et al 2009 in my database creation. I chose to primarily use the European Commission’s Register of Interest Representatives and the European Parliament’s List of Accredited Lobbyists, supplemented by other sources.⁵ In addition, I took the Parliament List of Accredited Lobbyists and hand coded the main explanatory variables for each group, using the Commission data as a guide. This leaves me with a unique dataset that maps over 4,000 groups, a fairly significant sample of the interest group population.

I chose to rely on the EC database for a number of reasons. First, while registration is voluntary, it is low cost – groups have to complete a fairly simple online form, and agree to a standard Code of Conduct. While registration doesn’t guarantee or provide concrete access to the Commission, there is a slight benefit in that groups who register can

⁴See http://ec.europa.eu/transparency/docs/reg/FAQ_en.pdf.

⁵There has also been a proposal to create a common register incorporating both information from the EC and Parliament into one database (although it has yet to be approved).

receive email alerts when the EU is taking action on their interest area. Second, the EU has strongly encouraged participation as part of the wider transparency initiative – by filling out a profile in the register, the EC claims groups “have the opportunity to demonstrate their strong commitment to transparency and the full legitimacy of their activities.” Considering the active role the EU plays in cultivating activity, groups seeking access would most likely register with the Commission first. There are also external pressures related to transparency that affect this list (and potentially not private directories), for groups like Alter EU have publicly shamed groups they have discovered to be missing from the register.⁶ Finally, the EC register provides the most current data on interest group characteristics and includes the groups that are the target of this study (groups lobbying at both of the primary EU institutions).

The Commission Register includes information on group name, acronym, legal status, website, category of activities, head of organization, contact details and country, goals, fields of interest, networks, information on lobbying activities, members, and financial data. The entries primarily were logged in the years 2009 and 2010, and at the time of data collection there were over 3,000 entries. Data points on budget and total membership were reported differently by four group types⁷ – Professional Consultancies/Law Firms, In-House Lobbyists and Trade Associations, NGOs/Think Tanks, and Other Organizations.

The List of Lobbyists Accredited to the European Parliament is a list of lobbyists and organizations who have applied and been given access to Parliament for lobbying purposes. Any group wishing to enter Parliament to provide MEPs with information must be given a pass, either valid for one year or temporarily, after registering and agreeing to a code of conduct. I assume that being granted access effectively proxies for lobbying activity. This list outlines both the name of the groups/individuals who have been granted access for 2010 and the names of the staff members given access (there can be multiple per group). There were 1880 organizations registered to access the European Parliament at the time of data collection.

⁶See <http://www.alter-eu.org/documents/briefings-info-sheets/2010/03/11/blacklist-of-unregistered-lobbying-consultancies>.

⁷Professional Consultancies/Law Firms includes law firms, public affairs consultancies, and similar organizations, In-House Lobbyists and Trade Associations includes companies, professional associations, trade unions, and similar organizations, NGOs/Think Tanks includes NGOs, think tanks, and similar organizations, and Other Organizations includes academic and religious groups, associations of public authorities, and similar groups.

4.1 Methodology

I test how group characteristics predict that a group will lobby the various venues of the EU on a database of 4,316 interest groups.⁸ The data is cross-sectional, with the interest group as the basic unit of analysis during the single time period of 2010 (if these data sources continue in their current form, in the forthcoming years time series analysis will be possible). The dependent variable is nominal, and measures whether the interest group lobbied only the Commission, only the Parliament, or both. I run a multinomial logistic regression to measure the probability of each choice of venue, given my explanatory variables. The multinomial logit allows for multiple nonordered choices, but it operates under the assumption of the Independence of Irrelevant Alternatives. Both the Hausman and McFadden and the Small And Hsiao tests show that the assumption of IIA holds in this study, furthermore, running the model specification as a multinomial probit (which relaxes the assumption of IIA) results in very similar findings (Hausman and McFadden 1984, Chen and Long 1997).⁹ Using the multinomial logit model, I also produce predicted probabilities for representative cases. I explore cases of either NGO or business groups who are well-resourced (represented by having a Brussels office) or not, and representing national or European interests (compared to mixed). Summary statistics and details of the predicted probabilities can be found in the Appendix.

My explanatory variables of interest are resources, information, representation, and policy. Macro-level data on resources is difficult to obtain (Broscheid and Coen 2007), so I turn to Mahoney (2004) for inspiration and use the maintenance of a Brussels office to provide a proxy for well-endowed groups. *Brussels* measures whether the interest group has a main office in Brussels (0 or 1). To measure the access good of information, I draw on the conception of interest group category/type to serve as a rough proxy for types of information (in the vein of the access good theory detailed earlier). *Business* groups consist of lobbyists, firms, and trade unions, and would be (generally) expected to provide technical and policy specific information, as would *Professional Consultancies*. *NGO* is a group that consists of NGOs, think tanks, and other organizations, and would be expected to provide information about diffuse or widely salient issues of policy concern. In the spec-

⁸This number is based on data collected in December of 2010, and is after deleting duplicate and incomplete entries.

⁹Ideally, with further data collection this study could be performed using a nested logit to explore patterns of choice, but at the time of writing there were no variables that were alternative-specific.

ified regressions, business groups serves as the base case. I measure representation with a series of dichotomous variables that measure whether the interest group reported that it represents *European* interests only, *National* interests only, *Global* interests only, or any combination (*Mix*). Finally, I include a number of policy variables, to ensure that the results aren't driven by specific topics. There is no detailed data on policy in the Commission Register, but groups did list their main fields of interest across a number of policy areas, which I matched for the Parliament entries. I code groups for the following areas: Research and Technology, Competition, Environment, Economic Affairs, Enterprise, Education, Development, and Humanitarian Aid.

5 Results

If prior theories about interest group strategies are true – groups rely on the type of access good they provide and target accordingly and well-endowed groups are more active – then we should see this in the results. Columns 1 and 2 examines the main explanatory variables across using the Commission Only as the base choice category, and Column 2 features the results using "Lobby Both" as the base category. Both specifications are presented in order to analyze the choice of lobbying one institution or both, as well as the choice of just lobbying a single institution.

The results are mixed when it comes to testing the preexisting theories regarding resources and access goods. The positive coefficient on Brussels in Columns 1 and 2 indicates that having a Brussels office increases the probability of lobbying the Parliament only or both, compared to lobbying only the Commission, holding all else constant. This effect is also larger for lobbying solely the Parliament. In Columns 3 and 4, one can see the effect of resources on the choice to lobby one institution only – compared to lobbying both places, having a Brussels office has a negative effect on lobbying the Commission and a positive effect on only lobbying the Parliament. While this shows evidence for the idea that being well-resourced improves a group's propensity to lobby multiple venues, it also shows a clear resource bias towards the Parliament (not the Commission, as prior theories would otherwise predict).

Looking at the concept of type, as it proxies for access good, it seems certain types of groups follow stereotypic patterns. Holding all else constant, NGOs are more likely

Table 1: Determinants of Lobby Choice

	1	2	3	4
	Reference Case: Commission Only Parliament Only	Lobby Both	Reference Case: Lobby Both Commission Only	Parliament Only
Brussels	2.597*** (0.143)	1.317*** (0.112)	-1.317*** (0.112)	1.280*** (0.153)
European	-1.803*** (0.181)	0.723*** (0.178)	-0.723*** (0.178)	-2.526*** (0.225)
Mix	-2.701*** (0.212)	0.563** (0.174)	-0.563** (0.174)	-3.264*** (0.252)
Global	-0.473** (0.174)	1.063*** (0.187)	-1.063*** (0.187)	-1.536*** (0.225)
NGO	0.493*** (0.143)	-0.847*** (0.111)	0.847*** (0.111)	1.340*** (0.163)
PC	1.837*** (0.259)	0.188 (0.185)	-0.188 (0.185)	1.649*** (0.267)
Research	0.221 (0.143)	0.300** (0.111)	-0.300** (0.111)	-0.079 (0.156)
Competition	0.853*** (0.136)	0.384*** (0.100)	-0.384*** (0.100)	0.469** (0.150)
Economic	2.305*** (0.147)	-0.028 (0.103)	0.028 (0.103)	2.333*** (0.162)
Enterprise	1.986*** (0.141)	0.517*** (0.119)	-0.517*** (0.119)	1.469*** (0.159)
Environment	-0.418** (0.145)	-0.061 (0.113)	0.061 (0.113)	-0.357* (0.159)
Education	0.412** (0.153)	0.254* (0.125)	-0.254* (0.125)	0.158 (0.170)
Development	0.258 (0.144)	0.249* (0.103)	-0.249* (0.103)	0.009 (0.157)
Humanitarian	0.238 (0.146)	0.193 (0.104)	-0.193 (0.104)	0.045 (0.160)
_cons	-4.183*** (0.200)	-2.591*** (0.167)	2.591*** (0.167)	-1.591*** (0.241)
Pseudo R-Square	0.368		0.368	
Observations	4280		4280	

* $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Beta coefficients presented, SE in parentheses

than business groups to lobby only the Parliament and less likely to lobby only the Commission. However, I also find that NGOs are more likely to lobby one venue or the other (instead of both). While it seems NGOs do target the Parliament, being an NGO also increases the probability of only lobbying the Commission as well, indicating that this group type doesn't take advantage of multiple venues, and isn't solely attached to the European Parliament. Regarding professional consultancies, the results are similar. Meanwhile, business groups are more likely to lobby both places, holding all else constant. At least for now, it shows that business interests can more readily adapt to navigating multiple venues, while NGOs are more selective (but selective in lobbying either venue, not just the Parliament).

When considering representation, there are a number of interesting results. Being a group that represented European interests, compared to national interests, reduces the probability of lobbying only the Parliament over the Commission and increases the probability of targeting both (holding all else constant). There is a strong and significantly negative effect for lobbying only Parliament, and a positive effect for lobbying both. From this it seems that European groups target both institutions, and when targeting one are more likely to favor the Commission. Global and mixed interests follow a similar pattern. On the other hand, compared to representing European interests, national groups see a significant increase in the probability of lobbying Parliament, and a smaller but positive increase in the probability of lobbying only the Commission (and a corresponding negative change in the probability of lobbying both). As a result, it seems that being a national group over a European group means you are less likely to utilize multiple venues, and those who do are more likely to lobby Parliament.

In terms of policy, the economic fields of interest usually associated with the Commission aren't borne out in the results. Groups that focus on Research, Competition, Enterprise, and Economic Affairs all have positive and significant changes in the probability of lobbying Parliament only. These groups are more likely to lobby just the Parliament or both than only the Commission. Meanwhile, fields that were stereotypically associated with the Parliament – Environment, Education, Development, Humanitarian Aid – show opposite or no effects. Being a group with environmental interests decreases the probability of only lobbying the Parliament, compared to the Commission only or both. This could lend strength to the idea that groups are choosing venue based on factors not necessarily relating to policy, or perhaps current interest groups multitask to the extent that

they simultaneously focus on many fields, potentially making policy area a poor predictor.

It is also illustrative to consider the predicted probabilities associated with these two models – by fixing group characteristics and varying one variable, one can analyze the difference in the predicted probability of lobbying for that group based on the change in category. Table 3 in the Appendix presents the significant differences in predicted probabilities for a wide variety of cases. The difference for a group that has a Brussels office, compared to a similar group without one, is consistent across type and representation. For both NGOs and business groups, representing national or European interests, gaining an office in Brussels greatly increases the predicted probability of lobbying only the Parliament (ranging from 27.6 to 62%) and significantly decreases the probability of lobbying only the Commission (from 40% to 61%). Again, this refutes the hypothesis that well-resourced business groups dominate activity at the Commission, and shows that well-resourced national groups are less likely to utilize multiple venues (potentially implying that the choice of venue is based on information fit). In terms of lobbying both, having an office in Brussels has a different impact depending on representation: this increases the probability of lobbying multiple venues for national interests but has the opposite effect for European interests. Table 3 also shows that for well-resourced or less well-resourced NGOs, representing European interests means these groups are less likely to lobby the Parliament and more likely to lobby both places or the Commission only (though the difference in predicted probabilities is larger for business groups).

6 Conclusion

The goal of this paper was to explore how interest group characteristics inform the choice to lobby the various institutional venues of the EU, using a unique database that allows for the mapping of interest group strategies on a large scale not seen in prior empirical analyses. This is part of a larger research agenda, and in the future I hope to extend this work to collect new data to examine more micro-determinants of lobbying. Meanwhile, my empirical results suggest some support for hypotheses regarding resources and type, but also show that there are other important predictors of interest group strategy. I find that business groups are more likely to utilize multiple venues, while NGOs are more

targeted in only lobbying one institution. Resources affect the probability of lobbying both, but also shift lobbying in ways we might not expect, and it may be that representing national interests limits group strategies more than European interests. When considering policy, it seems that groups (and most likely the institutions themselves) are both active across all policy areas.

Furthermore, my study has important implications for democratic policymaking in an environment with very distinct access points. It is important to recognize that specific types of groups are utilizing multiple venues (and potentially achieving more influence), and it is especially salient to note that groups with more resources may be targeting the only democratically elected EU institution (a finding very relevant considering the recent lobbying scandal in Parliament). These results, while a first cut at the broad patterns of lobbying, indicate that it is most likely different combinations of factors that predict venue choice by interest groups.

The dearth of data is a problem in the study of this topic. In general, more detailed data needs to be gathered on interest group characteristics – number of staff, number and type of members, total budget, estimated costs spent lobbying, member state representation, group age, and legal status could provide a rich analysis on interest group strategies. It is also clear that the nature of the policy cycle matters, for groups could lobby different venues based on the location of the legislation in the drafting processes. While there is no time series data available for European interest groups, efforts should be made to begin tracking behavior so such an analysis could be done in the future. In the meantime, scholars should turn to in depth interviews to tease out the motivations and timing behind specific group strategies.

In addition, going forward there needs to be more theorizing about alternate considerations that could drive interest group strategy, which could explain some of the novel results of this paper. For example, Proksch and Slapin (2010) note that groups can seek a less influential venue like Parliament for reasons other than immediate influence on policy (for networking, or instigating public debate on their issues). Mazey and Richardson (2001) also posit that groups could lobby multiple venues in order to gain information about the policy process (given the sheer complexity of the EU system), in order to “minimize surprises” about upcoming issues or legislation in their fields of interest. More theoretical work needs to be done not only on the choice of access point in the EU, but

to extend the variety of motivations interest groups could have while lobbying. The initial empirical analysis in this paper is part of a larger project, and hopefully this study can help target future data collection by allowing researchers to hone in on specific subsamples of groups and theorize in new ways about specific patterns of behavior.

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7 Appendix

Table 2: Summary Statistics

Variable	Mean	Std. Dev.	N
Lobby Choice	1.517	0.742	4316
Brussels	0.282	0.45	4291
European	0.271	0.445	4316
Mix	0.332	0.471	4316
Global	0.158	0.365	4316
NGO	0.435	0.496	4316
PC	0.079	0.269	4316
Research	0.28	0.449	4313
Competition	0.427	0.495	4316
Economic	0.442	0.497	4316
Enterprise	0.32	0.466	4313
Environment	0.295	0.456	4313
Education	0.229	0.42	4315
Development	0.289	0.453	4316
Humanitarian	0.285	0.452	4314

Table 3: Predicted Probabilities

	Brussels 0-1
NGO, European	EP: .3091, Both: .0971, EC: -.4062
NGO, National	EP: .6218, Both: -.0087, EC: -.6131
Business, European	EP: .2760, Both: .1507, EC: -.4267
Business, National	EP: .5935, Both: -.0279, EC: -.5656
	National to European
NGO, Brussels	EP: -.5004, Both: .1593, EC: .3410
NGO, No Brussels	EP: -0.1877, Both: .0535, EC: .1342
Business, Brussels	EP: -.5342, Both: .3010, EC: .2332
Business, No Brussels	EP: -.2166, Both: .1224, EC: 0.0942
	Business to NGO
European, No Brussels	Both: -0.1136, EC: 0.1169
European, Brussels	Both: -.1672, EC: .1374
National, No Brussels	Both: -0.0448, EC: .0706
National, Brussels	Both: -.0256, EC: 0.0295

The predicted probabilities reported in each cell are the difference in changing from one category to the other listed at the top of the second column, given the group characteristics in the first column, for the European Commission (EC), European Parliament (EP) or Both. For example, the second row shows the difference in predicted probability of lobbying the EP, Both, or EC given that NGO=1 and European=1, changing the category of having a Brussels office. Only significant differences are reported, and are significant at 5 percent.