Change and persistence in EU business lobbying

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Draft

Abstract
Conventional wisdom has it that business lobbying is most effective when it is based on close collaboration with desk officers in charge of writing the detailed policy proposal. This view has been most pronounced among business associations operating in cooperative systems such as the German one but also has been prominent among EU business associations. This preference is well documented in our survey study which we did twelve years ago. When we started our new project, the first explorative interviews in the German business world indicated a change. The perception of our interview partners was that policy-making both at the national and at the EU level has become more and more politicized and, consequently, calls for an adjustment in lobbying strategies.

On the basis of a large data set the paper will test if this is just a minority view and if over the last decade there really has been a change in lobby strategies and in the perception of the importance of different kinds of decision-makers. In view of all the changes that happened during that time it sound reasonable to expect that the business world has altered its approach.

Research strategy
We present here first findings of a large-N research project that is comprehensive in terms of policy sectors and issue areas and covers national and EU level business associations and big companies. Whereas we addressed the total population of business associations, we only included a representative sample of large companies in our survey. The study is unique in the sense that it is a replication of a survey we did twelve years ago so that our data allow for a comparison across countries and time. In the former survey we included national business associations and companies in the three large EU member states France, Germany, and the
United Kingdom. We now expanded the survey to the new member states. We decided to include Poland because it represents a different and young associational tradition as it prevails in most new member states and in terms of political weight and economic importance most closely resembles the other countries in our sample. In addition, we expanded the survey to non-governmental organisations (NGOs) at the EU-level. Surveying EU-level NGOs will allow us to test the hypothesis that business associations and NGOs differ both with regard to their organisational characteristics (structure, resources, demography) and behaviour (role of expert knowledge, insider versus outsider strategies, public relations).\footnote{This aspect, however, is not covered by my paper; see the paper presented by Christine Quittkat.}

Because of time constraints, so far we have complimented the survey data only by a few interviews with representatives of German interest associations and firms.

The replication of a survey has the clear advantage that it will produce exact data concerning alterations in structure and strategies today as compared to ten years ago. However, we have to consider that not the same people will respond and that meanings may have changed over time so that for example, respondents may be more ready to classify a relationship with national or EU institutions as ‘conflictual’ than before. Another problem is that change over time may not become visible because, for instance, already ten years ago the importance of contacts to the working level of the Commission received the highest rank possible.

Generally speaking, diachronic survey research is not without problems. The survey has to consider changes in context conditions while - for methodological reasons – we tried to modify the questionnaire as little as possible. This is a severe constraining factor as rephrasing some questions or introducing additional questions would have been helpful to get the information needed to identify cause-effect relationships.

**The joy and anguish of empirical research**

We started the research to know more about business interest representation in the EU and to find out how the business world responded to changes in their lobbying environment. In our view conditions have changed considerably. EU market regulation has progressed, institutional reforms affected power relations, a new governance approach altered some rules of the game, and with enlargement new actors have appeared on the scene. A whole range of reasons for changes in the ways and means of interest representation.
When we looked for additional factors relating to the choice of lobbying strategies we came up with four further assumptions: We, first, projected that the politisation of EU politics which comes with the expansion of EU policy domains touching on major societal cleavages and value conflicts might have an impact. Another hypothesis is that BIAs which invest the major part of their resources on interest representation may have a different approach. Furthermore, it seems logical to expect that the size of associations and their presence in Brussels makes a difference.

We'll leak the result before you read on: Change in the past twelve years has not been dramatic and we will have to go into detail to disclose change and continuity. This will be done in the second part of the paper. In the first part I address the question whether or not politisation, emphasise on interest representation, size and an office in Brussels make a difference.

**Variables that matter – or don’t**

The limited impact of politisation
The overwhelming majority of our respondents agree that the conditions for EU interest representation changed since the 1990s and say that now political rather than technical considerations have become prominent among EU-institutions. But when we systematically checked whether it makes a difference whether respondents see an increase in the politisation of the EU or not, the analysis of our data produced an ambivalent result. With respect to our second hypothesis we can put it bluntly: The statistical analysis proved us wrong. BIAs allocating more resources to the representation of interests than on the provision of services and market coordination did not show a deviant behaviour. The concentration on interest representation just has no significant effect on patterns of contact, on the assessment of the importance of actors, on the timing of interventions, on the choice of instruments or on cooperation partners.\(^2\) Only the size of an association and whether or not it is located or has an office in Brussels has a significant impact on lobbying strategies. The perception that the EU has become more political only produced a few consistent answers.\(^3\) Respondents who agree with the statement believe far more often than their counterparts that national and EU NGOs are important actors at the EU level and that

\(^2\) When the regression confirmed high levels of significance, the deviations were negligible.

\(^3\) Regression analysis with mostly high levels of significance.
cooperation with NGOs is useful. Furthermore, they consistently have a higher appreciation of the EP. They attribute the EP a greater influence in detailed technical questions and even more so in questions of general public interest and are - more than any other institution - of the opinion that the importance of the EP increased. In this respect they deviate from the average opinion of national and EU associations. Another characteristic of this group is that they rate the increase in the importance of the Council higher than anybody else. But when it comes to assess the importance of contacts to the individual EU institutions, they are very much in line with the EU level associations and deviations are far more pronounced among national BIAs. It is truly remarkable that taking the view of an increased politisation does not have any significant effect on contact patterns at the EU level. And it is even more surprising that it does not influence the manifest cooperative relationship with EU institutions. When the question concerns the information political institutions ask for, the issue of politisation makes no difference and answers even do not depart from the mainstream when they concern the assessment of political effects. In one particular point the data confirmed our expectation. Also those who think that the EU decides more on political terms do not select their contact partners according to party membership. The politisation of the EU is just not to be confused with a trend towards party politics. Just on the contrary, they definitely prefer contact partners with administrative responsibilities to avoid political considerations. The choice of instruments shows some difference as those who see a certain trend in politisation are more inclined than the rest to participate in committees and in policy forums and to rely on the mobilisation of the public and the media. However, they also advocate more strongly to present scientific expertise. With respect to the timing they pay significantly closer attention to the early phase of decision making, especially on the time when the Commission formulates its proposal.

The importance of size and location
It was less frustrating to check whether the size of an association – measured in terms of employees\(^4\) – and the location of the office or rather a representation in Brussels\(^5\) make a difference. Whenever size and being present in Brussels had a significant influence on the responses, it conveyed the impression that it is a matter of capacity and low transaction costs. Both characteristics often had similar effects which is trivial when it concerns lobbying contacts. It is to be expected that the respective associations have significantly more contacts

\(^4\) We differentiated between associations with up to five employees and the rest. For the distribution of size see page 12.
\(^5\) This group includes EU level BIAs and NGOs and national BIAs with an office in Brussels.
to all EU institutions. It is more telling that they deviate less in their contacts to the working than to the top level of the Commission. They have far more frequent contacts to the political decision makers and their supporting institutions. This holds true for their contacts to the top level of the Commission, to the European Council and to the Council of Ministers, including COREPER and the Council secretariat. And they enjoy far closer relationships with the EP than any national BIA which does not have an office in Brussels. The intensity of contacts with the EP is very high both to the committees and rapporteurs and to the individual members of the EP and less intensive but still very frequent with the secretariat of the EP. Size is also an advantage for close contacts with the national level but only when compared to EU level associations. When associations are asked how they assess the importance of institutions or the character of the relationship, large association deviate partly from associations located in Brussels. Size correlates with the appreciation of the political actors that is with the top level of the Commission, the institutions of the Council, and the committees of the EP. Those with an office in Brussels are comparatively less impressed by the institutions of the Council. The assessment of the importance of national institutions is also affected by size and the availability of a Brussels office though in different ways. Large associations attribute greater importance to national governments (especially to the top level) and those operating from Brussels rank the party groups in national parliaments high. Being present in Brussels obviously supports smooth relations to the EP but otherwise does not bring any change and size has no effect whatsoever. When it comes to the choice of instruments large associations are comparatively keener on targeted contacts and definitely believe in the usefulness of mobilising the public and the media. An office in Brussels apparently makes it attractive to use the whole range of instruments. An office at the ground and larger staffs also provide the capacity for early intervention that is when the political agenda is set and the Commission formulates its proposal. And both resources facilitate representing interests during the debates in the EP and in the Council. It goes without saying that size is also an advantage for good timing at the national level whereas the office in Brussels does not help. One interesting point is that associations present in Brussels think that companies are more important at the EU level than all other associations.
**Adjustment to change – general remarks**

So far I have drawn a rather static picture based on our recent survey. What can we learn when we compare this year’s survey with the survey data from 1999? Bearing in mind the ever larger transfer of competences to the EU level and the recent institutional reforms we might expect quite a change. After all, the salience of EU policies has increased and access opportunities have improved. Consequently, it is reasonable to expect that interest groups will turn to the EU and adapt to the changes in the target structure.

This hypothesis is supported both by a constructivist and a rationalist approach. The socialisation effect should be most visible in the case of BIAs in the old member states and less in the case of Polish BIAs which only had a few years to adapt to the rules of the game. In a rationalist perspective the reasons for a change of behaviour are different. External events are of importance because they may significantly alter the cost-benefit relations. The current financial crisis is the main news and it goes without saying that it has most severely affected the financial sector. For some banking sectors such as cooperative banks and saving banks, which mainly do business with small and medium-sized enterprises at regional level, the world has changed dramatically compared to the 1990s and only in the past few years Europeanization really hit home (Interview 3). But other major developments both in market conditions and in the institutional setting have occurred that have considerably changed context conditions for all interest groups in the last decade.

Even though all business actors face these new context conditions, we should not expect convergence in the way they adapt. The reason is that national BIAs are still firmly tight to the domestic system of interest intermediation. National associations have, over many years, found equilibrium in adjusting their structures and strategies to meet the demands of their members and to have a rewarding exchange relation with government. The readiness and capacity to adapt to the logic of the EU system is constrained by the fact that the national system of interest intermediation may deviate considerably from the EU system. This divergence may put the associations under great stress and may impede an optimal adjustment to EU conditions. An additional constraining factor for the Europeanization of associations is that they have to be equally active in EU lobbying and in domestic politics and that EU politics takes place in a system of multi-level governance. Even a shift of decision making competence to the EU does not strip national public actors of all their political power. Accordingly, the appreciation of national institutions as contact partners is high and not much lower than EU institutions.
How important are your contacts with the national institutions with regard to EU-law making?

In addition, interest representation is not the only task of national BIAs. Many BIAs provide services of different kinds to their members which, again, ties them to their home base. On average national BIAs spend a considerable amount of their resources on the provision of services. When asked to estimate the proportion of resources they spent on services, the answers document great disparities in between countries that range from 27.62% in the case of Poland to 40.35% in the case of France.

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6 Tough we can notice a declining tendency in most categories with the exception of the furthering education and qualification of members and of the issuance of licenses and certificates.
On top of that, national BIAs have to be well adapted to the national system of interest representation because they want to have the support of national decision-makers to influence policy-making in the EU. This explains why - on average - contacts to national institutions concerning the EU are still strong (see p. 15).

**Dimensions of change**
Four main developments in the last decade are most likely to have affected interest group behaviour: EU market integration has deepened and thus increased the relevance of EU policies; the reform of the institutional system of the EU has shifted competence and, in particular, upgraded the EP; enlargement has brought new actors to the game; the EU support to NGOs has established new competitors. All four developments are likely to have changed the logic of influence.

**Growing importance of EU market integration**
Deepening EU market integration comes with an increase in EU regulatory interference in markets and new provisions for enterprises which directly affect business. As the impact is felt differently in individual countries depending on national competitiveness, prior national regulations and the different national capabilities to adapt, companies might turn to national-level associations to represent their interests in Brussels.
An increase in the resources of national BIAs might indicate the willingness of members to allocate more funds to their association. Despite methodological difficulties to explore this further (companies are members in a variety of associations and some association have additional incomes) interviews make it clear that associations made efforts to improve their performance by streamlining and modernization just because they could not expect a sizeable increase in their resources and, on the contrary, had to face the formation of new associations. Members did not leave but decided to establish new, more specialised associations with a profile matching their special needs (Interviews 1, 2).

An alternative strategy is to cooperate with EU business associations, to form alliances with other interest groups including NGOs, to turn to professional consultants or to take action themselves (see the paper by Christine Quittkat).

From our interviews with big (German) companies, which see the global markets as their main playing-field, we gained the impression that they de-emphasise the importance of both the national and EU level BIAs. They maintain their membership but mostly rely on their own representations for information and lobbying. In addition, scouting is not just used for product and technological trends but also for political developments concerning market interference in the EU and in other important countries (Interview 6).

**What EU institutions are looking for**

There are good reasons why EU institutions, and above all the Commission, are looking for external expert advice. Compared to the (large) member states the EU has only a rudimentary expert system and the Commission and the European Parliament have only comparatively small administrative resources. The demand for expert knowledge goes into different directions. One dimension is the technical or even scientific knowledge of the substance matter, another one the economic and social effects of regulation, and still another one the fit with the existing legal system and regulatory environment and, last, but not least, the assessment of political effects.

In our on-going study national BIAs more or less confirm their experience of a decade ago: EU institutions are mainly interested in technical expert knowledge (54.9% with a slight increase over the years) and less in economic expert knowledge (43.6%) and in information on political effects (36.9 %.). BIAs are clearly less often asked (20.1%), and even with a slight declining tendency, to provide legal expert knowledge. The answers of EU level BIAs confirm these priorities. In contrast, NGOs register a high interest in their political assessment
and also in their technical expertise but hardly in their economic and not at all in their legal expert knowledge. Though we can see distinct differences among national BIAs, the priority list again looks the same. In all categories German BIAs have the perception that they are asked quite often and significantly more often than their counterparts from other countries with regard to legal and economic information.

*Which kind of political information do political institutions ask from you? (2012)*

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**Adapting organisations to change**

How can we tell if BIAs have responded to increased demands? Here we are confronted with a methodological difficulty. When detailed expert knowledge is the door opener then the number of permanent staffs or the size of the budget is not a reliable indicator for the association’s capacity to perform. Associations often have to get back to their members to provide the expertise that fits the demands of the EU. Either individual firms or an ad hoc consortium of firms have to step in or the membership has to provide extra money to pay for external experts. The association’s role is then mainly to act as “knowledge manager”.

The research focus on exchange-goods overshadows the importance of the daily business of interest representation. The watchdog function of associations is also of great value. BIAs demonstrate presence, provide general information to members and to institutions, keep
contacts and monitor the policy process. This task is essentially a matter for the permanent staffs of the association and their performance depends on budget, manpower, and management abilities. Another important asset is being present in Brussels. An office in Brussels staffed with a team of people who are well versed in the functioning of the EU system and who have insider knowledge and contacts is definitely an advantage. A representation in Brussels reduces transaction costs and increases a BIA’s capacity to establish personal contacts in an informal way. But it is an expensive investment and it is to be expected that small national BIAs will be hesitant and rather rely on their branch or sector association to step in.

**Being present in Brussels**

Accordingly we expected mixed results, e.g. more business representations established by large firms and associations and stagnation in the case of others. From our German perspective, the growth in firm representations in Brussels is impressive. But the differences between countries are glaring.7 Germany stands out with 75% of the companies saying that they have a representation in Brussels. When we only look at the German representations, the growth in the recent past is striking. Whereas in the 1990s only a limited number of economic interest groups were present in Brussels, now the register of the representation of German interests has 93 pages and lists 92 firm representations8. You think of a big German company, irrespective of operating in industry, in the services, in trade, in the banking or in the insurance sector, and you will find a representation in Brussels.

Also more and more German BIAs have an office in Brussels; The register mentioned above lists over 70 offices of German BIAs.9. This trend, however, is not at all representative for the other big member states.

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7 These data have to be taken with a grain of salt for two reasons: We only included the very large companies in our survey and the respondent rates are very low.
8 Without counting law firms and consultants.
9 The register is compiled by the office of the Permanent German Representative to the EU and lists 101 German representations of Business associations and Chambers of Commerce. Among those are ten chambers, five organisations we classified as NGOs, four employers representations, three business enterprises, eight state-sponsored institutions, and one representative of a coalition of Länder. Ständige Vertretung der Bundesrepublik Deutschland 2012: 29-40.
Does your association have, or did it have, a liaison office or branch in Brussels?

<table>
<thead>
<tr>
<th>country</th>
<th>Germany</th>
<th>France</th>
<th>Great Britain</th>
<th>Poland</th>
<th>Total</th>
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<td>28,9%</td>
<td>32,4%</td>
<td>15,5%</td>
<td>-</td>
<td>25.5%</td>
</tr>
<tr>
<td>2012</td>
<td>41,6%</td>
<td>25,3%</td>
<td>10,4%</td>
<td>3,3%</td>
<td>25.6%</td>
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</table>

Size of associations

Even when business decides to intervene directly in EU policy making, we expected that they will not neglect representing their interests within and through the EU associations. Looking at past experience, we assumed that investments may still be small and not dramatically change the capacities of EU-level organisations. From the very beginning the overwhelming majority of EU business associations have been federations of associations. When compared to their member organisations at the national level their staff and budget has always been small. When the EU started with deep cutting regulatory activities in the 1980s powerful national member associations and above all big players among business were ready to give more support to their EU federation. However, at that time the added resources did not bring the EU BIAs to the same level of staffs and budget.

The resource endowment in terms of employees is still limited today when compared to national BIAs. The majority of EU BIAs are small (54.2% have staffs up to 5 persons) whereas only 38.4% of national BIAs that small. Nevertheless, EU associations have grown over the years (65.4% EU BIAs had only up to 5 employees in 1999). Despite limited resources, national business groups rate the importance of EU trade associations higher than of any other interest organisation at EU level and also consider them to be the most useful cooperation partner.
**How many employees does your association have? (2012)**

**Association Size by Type of Association**

[Bar chart showing distribution of association sizes by type: National BIA, EU BIA, EU NGO.

Timing of representing interests**

Although BIAs acknowledge that lobbying should start as early as possible, the majority of national BIAs do not at all or only occasionally intervene when the political agenda is set and this has only very slightly improved over the years. They rather take action in the later phase of the policy cycle and compared to EU level interest groups (both EU level BIAs and NGOs) most national BIAs are latecomers. At the national level the domestic BIAs intervene far earlier but with marked differences among countries. To what extend these differences correspond to the specific national cultures in interest intermediation will be explored in a future paper.
Political observers often emphasize that the right timing of representing interests is very important. When do you represent your interests vis-à-vis ...

Institutional reforms

The impact of institutions
Research on Europeanization has provided ample evidence that EU integration has a deep effect on national policies and actor behaviour. Different schools of thought support this view even though their theoretical explanation differs. The constructivists argue that when transnational collaboration becomes more frequent, regular, and enduring it will go hand in hand with the socialization of actors into EU norms of appropriate behaviour and the dissemination of best practices. In a rationalist perspective opportunity structures make all the difference and it is common knowledge that institutions\textsuperscript{10} have a decisive influence on setting constrains or creating opportunities. This general assumption has been confirmed by European interest group research. The core argument is that the specific institutional setting of the EU defines the conditions for successful lobbying.

It is the basic rule for successful lobbying that you have to be where the action is. In other words, the distribution of competence between the EU and member states and within the EU regulates the access strategies of interest groups. The expansion of decision making by majority in the Council and the upgrading of the EP in the now called “ordinary legislative

\textsuperscript{10}We conceive an institution as defined by Johan P. Olsen (2010: 36) “as a relatively enduring collection of prescribed behavioural rules and organized practices derived from collective identities and affiliations embedded in structures of meaning and resources.”
procedure” through the Treaty Reforms of Nice (2001) and Lisbon (2009) evidently have changed the decision making process. It has to be kept in mind, however, that business associations are less affected by these changes than other interest groups. First, internal market issues have been subject to majority rule since early on and, secondly, business lobbying traditionally relies more on insider strategies addressing the Commission and national ministries than on outsider strategies that aim at engaging the public and to which parliaments generally are more receptive than other institutions (Eising 2009: 186). Nevertheless, because of the EP’s overall gain in political importance and visibility we expected that also business associations will attribute more importance to the EP and that the key players in the EP will be targeted more frequently than a decade ago.

**Importance of institutions**

When national business associations are asked directly whether they believe that the importance of EU institutions has increased over the years, they agree without significant differences between countries. They attribute both the Commission and the EP a noticeable increase followed by the standardisation authorities and the EU agencies. Only the European Council and the Council are seen to have remained at about the same level. A comparison of the data from 1999 and 2012 tell another story. When asked “how important are contacts with the EU institutions” national BIAs attribute a significantly higher importance to the EP, hardly any increase in the case of the Commission and decreasing importance to the other institution – with the exception of France. Also nowadays French BIAs give significantly higher importance to the intergovernmental institutions of the EU, e. g. the European Council and the Council of Ministers.

We asked national BIAs how important contacts to individual EU institutions are when they want to represent their interests. Their answers are largely predictable: The working level of the Commission ranks first in importance and members of the EP come second. This ranking not only reflects differences in importance but also differences in the accessibility of institutions. Already in the past the Commission and the EP were more accessible than the Council and even more so than the European Council. Recent reforms have further increased access opportunities to the Commission and the EP but not to the other two institutions (8b). It is worth mentioning that the secretariats of the Council and of the EP are considered to be of lesser importance. It sounds plausible that BIAs want to address decision makers directly. But in our last survey their importance ranked slightly higher (mean value 3.62 in 1999 compared to 3.53 in 2012 with respect to the Council secretariat and 3.7 in 1999 compared to
In 2012 with respect to the EP secretariat). Without going into the matter any further at this point, I just want to mention that the mean values conceal substantial differences between member states.

*In order to represent your association’s interests, how important are contacts with the EU institutions? (2012)*

Apart from the variance between institutions we were interested in changes over the last decade and these are quite telling.

**Contacts to institutions**

How do national patterns of contact compare with the assessment of the importance of institutions? The regression analysis highlights that national BIAs always have more contacts to the institutions they consider to be important and this holds true across all types of institutions. Accordingly, BIAs have frequent contacts, in terms of having monthly or weekly contacts, to the working level of the Commission (director-general and desk officers), and to the individual members of the EP and their assistants and still high though a bit less frequent to the EP’s committees and rapporteurs. It is noteworthy that the majority of BIAs confirm that they have no contact neither to the European Council nor to the Council.
Contacts to national institutions also follow the assessment of importance. Again, BIAs have the most frequent contacts to the working level of government (from the permanent secretary down to the desk officer) and less frequent but still rather continuous contacts with individual members of Parliament. It goes without saying that variations between countries are more far pronounced as with regard to contacts to EU institutions.

Do you maintain contacts with national institutions concerning EU law making? If yes: How often do you maintain such contacts?
Changes regarding importance and contacts

We compared the level of importance attributed to the EU institutions in 1999 and 2012 and found our hypothesis mostly confirmed: The importance of the Commission remained constant and the importance of the EP increased with the exception of the secretariat. EU regulatory and standardisation authorities now definitely rank lower in the assessment of associations. The ratings of the Council are mixed among national BIAs and unambiguously lower than before among EU associations. It is remarkable that EU associations de-emphasise the importance not just of the Council of Ministers but also of COREPER and of the Council secretariat.

In order to represent your association’s interests, how important are contacts with the EU institutions? (1999 – 2012)

![Change in Importance of EU Institutions](image)

However, these figures could be misleading if we do not take into consideration, that the increase in appreciation is relative. In other words, the importance attributed to the Commission (top level and working level) used to be higher in the past than the importance of the EP (committees/rapporteurs and individual membersassistants) and despite the increased appreciation of the EP it still has not reached the level of the Commission’s directorates-general. Irrespective of some variations this applies to all national BIAs.
Contrary to their appreciation of EU institutions national BIAs believe that the importance of national institutions has remained the same, especially the importance of the national government, or even slightly declined.\textsuperscript{11} When asked how they evaluate the importance of contacting specific national institution– twelve years ago and today - we get the same answers. EU level BIAs stand out with a pronounced unfavourable assessment of the importance of national institutions.

\textsuperscript{11} With the exception of French BIAs which attribute a slightly higher importance to national institutions than their counterparts in other EU countries especially with regard to national standard authorities.
How important are your contacts with the national institutions?

![Change in Importance of National Level Institutions](image)

**Changed patterns of contact**

As already mentioned above, the patterns of contacts correspond to the evaluation of institutions. The picture is however blurred because, on the one hand, it is manifest that the overall number of contacts declined whereas the intensity of relations of those who have contacts increased. When comparing the development of contacts at national and EU level, it is apparent that contacts to national institutions have a stronger declining tendency. Only parliaments and above all parliamentary groups are not affected by this downward trend. Nevertheless, national BIAs engaged in EU lobbying still contact national institutions more often than they contact EU institutions. In our current survey 80.2% of respondents claimed to have contacts with national institutions as compared to 86.6% twelve years ago. The per cent of contacts with EU institutions are 70.0% in 1012 and 73.3% in 1999.

If we just look at the frequency of contacts (not considering those who have no contacts at all) and concentrate on those who have weekly or monthly contacts, the change in the intensity of contacts is obvious both with regard to the working level and to the top level of the Commission and the Council. Not surprisingly the increase in contacts to the EP, to committees and rapporteurs and even more so to individual members of the EP and their assistants is striking.
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<th>To the Commission</th>
<th>To the Council</th>
<th>To the EP</th>
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<td>14,2</td>
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Again it holds true that despite the remarkable increase in contacts to the EP the relationship with the working level of the Commission still outranks any other EU institution.
**Changes in new modes of governance and the impact of enlargement**

The turn to new modes of governance highlighted by the White Paper on European Governance (Commission 2001) went together with a commitment to strengthen ‘public-private partnerships’ and enhanced the status of interest groups. In the past decade the Commission has made several qualitative changes in the EU consultation regime. Consultations have become more open, transparent and participatory. The Commission introduced new consultation instruments (e.g., online consultations, policy forums and platforms), which promised to lower the threshold of access. Efforts in more transparency and the new consultation instruments were meant to improve access to the Commission.

The Commission has not just intensified cooperation with associations in general but made efforts to especially strengthen the rights and value based NGO sector. Last, but not least, by providing financial support to EU-level NGOs and NGO networks. Whether or not the improved consultation regime and the support for NGOs has provoked a qualitative change in the competitive environment of business interests and has changed their strategic repertoire will be investigated in Christine Quittkat’s paper.

We also expected that EU enlargement would change lobbying conditions because most likely it would bring an increase in competitors seeking ear-time with EU institutions. This is in line with our data: 70.8% of national BIA respondents claim that the competition between interest organisations has increased. In addition, we assumed an indirect effect namely that EU institutions, for the sake of reducing transaction costs, might be more open to deal with EU associations hoping that they present an aggregate view. This corresponds with the assessment of EU-level actors who say more often than BIAs from the old member states that access opportunities to the European Commission have improved. A more detailed analysis is presented in Christine Quittkat’s paper.

**Conclusion**

Considering that this is only a first attempt to make sense of our data, I will be very careful with conclusions. The data convey the message that national and EU level associations have increased their lobbying efforts though in varying degrees across Member States. When it comes to assessing the importance of institutions and contact patterns it is quite apparent that business interests prefer the direct contact with those who are in charge of shaping the
contents of a policy. In other words, the working level of the Commission is still the main target even though members of the EP are enjoying more and more attention from interest associations. We were surprised that despite the associations’ assessment of considerable changes in context conditions their lobbying strategies, even concerning the timing of interventions, only changed incrementally. It might be that when we investigate our data in more detail and look at national variations we can draw other conclusions.

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