



Working Paper



New and Not-So-New Trends in the Representation of Economic Interests in the EU

EUROLOB II Report 2016

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Arbeitspapiere – Working Papers

Nr. 165, 2016

Mannheimer Zentrum für Europäische Sozialforschung

Kohler-Koch, Beate:

New and Not-So-New Trends in the Representation of Economic Interests in the EU: EUROLOB II Report 2016 / Beate Kohler-Koch; Christine Quittkat. – Mannheim: 2016
(Arbeitspapiere - Mannheimer Zentrum für Europäische Sozialforschung; 165)
ISSN 1437-8574

Not available in book shops.

Token fee: € 3,00

Purchase: Mannheimer Zentrum für Europäische Sozialforschung (MZES)

D – 68131 Mannheim

www.mzes.uni-mannheim.de

Editorial Note:

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Abstract

This paper presents results of a comprehensive survey of business interest associations (BIAs) in France, Germany, Poland, the United Kingdom, and at the European level. Comparing the 2015 EUROLOB II data with our survey data of 1999 (EUROLOB I), we investigate whether or not national and European interest representatives modified their strategies of interest intermediation in order to respond to the new competitive situation caused by enlargement, institutional reform, and the Commission's turn to new modes of governance.

Our data convey a clear message: Advocacy in the context of EU law-making ranks high on the agenda of BIAs. In Brussels, EU associations are the most active BIAs, but national associations are hard on their heels. The strong presence of national associations in European policy-making is a manifestation of the multi-level character of EU advocacy. When national BIAs want to have an impact on EU law-making, they mostly turn to the national government (working level) and they directly reach out to Brussels. They experience EU institutions to be very willing to provide information and the EP to be more cooperative than their home parliament. EU-level BIAs also engage in multi-level venue shopping but are less active in lobbying national institutions.

Regarding the modification of interest intermediation strategies between 1999 and 2015, we find that institutional reforms have had a strong impact: The European Parliament now attracts considerably more attention than before. The national parliaments profited from this upward trend, although at a far lower level. In addition, the business world has intensified its contacts to the political actors, namely to the top level of national governments and of the Commission.

Generally, business associations widely agree that conditions of interest intermediation have changed since the turn of the century (national BIAs: 84.07%, EU level BIAs: 96.23%). Some changes are bothersome, such as the increase in competition between interest groups, and some are delicate, such as the growing relevance of political considerations in the decision-making of EU institutions. Other changes are welcome; above all, access opportunities to the Commission and the EP have improved. Yet, the EU's turn to participatory governance had a limited effect. The new consultation instruments, such as online consultations, policy forums, platforms, hearings, and conferences, have little attraction. Business actors stick to the proven mix of personal, targeted, and regular contacts or submit position papers. Brussels-based business interest associations are obviously best placed to profit from the participation in committees and expert groups. As in the past, the mobilization of the public and the media is only of secondary importance for business groups.

Other aspects of EU interest representation also remained stable. Like in 1999, activities continue to correlate significantly with a BIA's budget. To have a delegate on site is even more important. EU-level associations as well as national business associations with an office in Brussels maintain significantly more contacts both to the working level and to the top level of EU institutions than their competitors. In addition, the domestic background is decisive for national business associations. German, French and British BIAs are financially well-off, whereas Polish associations have strikingly low resources. The latter are also more embedded in their domestic environment, taking personal relationship and party membership in high consideration when selecting contact partners. The distinct profiles of national associations which we noticed in our first survey in 1999 are still visible today, and they are most likely to persist – just as the multi-level system of interest representation with a strong presence of national associations.

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1 Introduction

1.1 What we did

We here present the findings of the EUROLOB II project, a large-N survey that addressed all national business interest associations (BIAs) in France, Germany, Poland, and the United Kingdom as well as all BIAs at the level of the European Union (EU). In two waves (2012 and 2015) we have asked the associations' top executives about their activities and experience: Which contacts do they consider important and which institutions at national and EU level do they contact frequently? Which strategies and instruments do they prefer? Who are favoured partners? Apart from country origin, we also asked for organizational properties and membership characteristics that are most likely to make a difference. The written survey was addressed to 1964 BIAs with a response rate of 28.82 percent; in total we received 566 answers.

We are most grateful to all associations which took the time to answer our long questionnaire and provide additional information in interviews. Our communications confirmed that business people attribute growing importance for the companies' competitiveness to the EU, both at home and abroad. Consequently, business seeks to voice its interests and finds different ways to do so. Companies, endowed with sufficient resources, often decide to go it alone or to pay for the service of a lobby consultant. But with a few exceptions, the big global players are also interested in having their demands and expectations represented collectively. They join forces with other companies in specific focused sectors or more encompassing branch associations so that business interest associations are the recognized and highly active actors in EU advocacy. BIAs signalling their interest in EU affairs outnumber companies by far¹, and they rightly claim to represent an immense number of enterprises in all parts of Europe. This gives us a good reason to focus our research on business interest associations.

We conducted a total population survey, and our questionnaire was sent to all business associations irrespective of whether they claim to have a stake in EU affairs or not. We included the large umbrella associations and the peak associations of all the different economy sectors as well as the highly specialized associations representing only a small field of economic activities. Accordingly, our respondents represent the much differentiated universe of business associations. Apart from national origin, they vary in size, financial means, representativity, and task profile.

Table 1: Rate of returns EUROLOB II

	Germany	France	Poland	UK	EU	Total
N	553	394	132	436	449	1964
participation N	205	92	50	100	119	566
participation %	37.07	23.35	37.88	22.94	26.50	28.82

¹ The entries in the European Transparency Register are not reliable, but the only source-providing comparable data. On March 10, 2016, the register included 1894 BIAs with national and European level interests located in one of the 28 member states and 958 companies respectively.

1.2 What is special about EUROLOB II?

The study is unique in the sense that it is a replication of a survey we conducted in 1999 (EUROLOB I). Consequently, we can compare changes over time and investigate how the substantial developments and challenges of the last fifteen years, such as the deep-cutting reforms in the EU's decision-making system, the enlargement from 15 to 28 member countries, and the financial and economic turmoil, have affected business associations in their assessment of EU interest intermediation and in their choice of strategies.

1.3 What is the message of EUROLOB II?

Our research findings fully confirm the EU's importance in business' advocacy and highlights new and not-so-new trends in EU lobbying. The results of the survey can be summarised in four key messages:

1. The EU is an arena for intensive lobbying, but institutions are targeted to varying degrees.
2. EU advocacy is a multi-level affair not only for national associations reaching out to Brussels but also for EU associations addressing national institutions.
3. The deepening of integration and changing context conditions had a limited, though diverse effect on lobbying activities.
4. Business associations share common experiences but differ significantly in their lobbying strategies.

2 The EU as an arena for intensive lobbying

2.1 Importance and frequency of contacts

The overwhelming majority of BIAs participating in our survey consider their contacts to EU institutions to be very important, which is expressed by a mean value of around 5 on a scale from 1 (not important at all) to 6 (very important) for the Commission and the European Parliament (EP) (see Table 2).

Table 2: Significance attributed to contacts with EU institutions (mean; 1= not important at all, 6 = very important)

	European Commission: top level	European Commission: working level	EU regulatory bodies	Council: level of ministers	Council: COREPER	EP: committees	EP: individual members
mean	4.63	5.26	4.34	4.16	4.45	4.96	4.84

The attribution of importance goes hand in hand with a high presence of business associations in EU lobbying² and a considerable intensity of contacts (see Table 3).³ Even a conservative calculation of the frequency of contacts on the basis of our data results in impressive numbers (see Table 4).⁴

Table 3: Contact to EU institutions (mean; 1 = no contact to this institution, 2 = yearly, 3= half-yearly, 4= quarterly, 5 = monthly, 6 = weekly)

	European Commission: top level	European Commission: working level	EU regulatory bodies	Council: level of ministers	Council: COREPER	EP: committees	EP: individual members
UK	2.08	3.30	3.13	1.64	2.14	3.50	3.13
Poland	2.03	3.06	2.91	1.90	2.88	3.58	3.22
Germany	2.42	3.82	3.20	1.94	2.35	4.02	3.72
France	2.29	3.46	2.87	1.94	2.19	3.19	3.27
EU	2.80	4.63	3.41	1.84	2.92	4.67	4.10

Table 4: Contacts of EU BIAs and national BIAs from France, Germany, Poland, and the United Kingdom with EU institutions (EUROLOB II)

	Commission	EU regulatory bodies ⁵	Council	EP
Contacts per year	5670	3015	2037	6905
Average contacts per business day	22.68	12.06	8.15	27.62

Contacts calculated on the basis 1 = yearly, 2 = half-yearly, 4 = quarterly, 12 = monthly, 50 = weekly; 250 business days; 566 BIAs

However, we have to be cautious to use these numbers for a projection of lobbying density in the EU. Real figures are bound to be much higher since the calculation only comprises the respondents of our survey. We also would have to include the full range of business interest groups and add all the other actors of the large lobbying community active in Brussels and then take an educated guess as to the number of relevant access points. The institutions' staff numbers are not a reliable indicator because only a small group of the roughly 33 thousand people working for the Commission⁶ are worth targeting.

2 Among the EUROLOB II participants, 73.15% of the national BIAs and 95.80% of the EU BIAs have contacts to EU institutions.

3 For a more differentiated analysis see section 5.3.

4 The contacts are surely underestimated, as some BIAs informed us that they have daily contact with the Commission and/or the EP.

5 The term "regulatory bodies" refers to all kinds of agencies, regulatory authorities, and standard organisations.

6 As of January 1st, 2016, the Commission has had a staff of 32,966 people; see http://ec.europa.eu/civil_service/about/figures/index_en.htm; (29.2.2016).

2.2 Is registration in the European Transparency Register (TR) conclusive?

The summary assessment and the focus on contacts to EU institutions conceal wide disparities, which will be dealt with later. However, it should already be pointed out here that the conventional distinction between associations listed in the TR which are supposed to be the “European activists” and the supposedly more “homebound” associations which are not registered does not hold. As to national BIAs, the majority of our respondents (77.85%) were not registered at the time of the survey, revealing the TR registration to be not really widespread among national BIAs. Furthermore, the expectation that this is a coherent group with below-average EU activities proved to be wrong: About 60 percent of the non-registered national BIAs have frequent contact also with EU institutions. Among EU BIAs, we have a reversed situation with three quarters (72.27%) of registered associations and high strategic convergence (see Table 5).

Table 5: TR registration (as of 15.07.2015) and contact patterns

	National BIAs (447)		EU BIAs (119)	
	BIAs with TR registration	BIAs without TR registration	BIAs with TR registration	BIAs without TR registration
	99	348	86	33
Multi-level strategy	87 (87.88%)	208 (59.77%)	45 (52.33%)	21 (63.64%)
Exclusively EU institutions	5 (5.05%)	27 (7.76%)	41 (47.67%)	7 (21.21%)
Exclusively national institutions	5 (5.05%)	92 (26.44%)	--	1 (3.03%)
Neither contacts to national nor to EU institutions	2 (2.02%)	21 (6.03%)	--	4 (12.12%)

3 EU lobbying – a multi-level affair

The strong presence of national associations in European policy-making is a manifestation of the multi-level character of EU interest intermediation. From early on, national associations have set up European federations, and collective interest representation through EU associations is important until today. It is, however, not the number-one choice. When national associations want to have an impact on EU law-making, they turn to the national government and also reach out to Brussels directly. Equally, EU BIAs engage in multi-level venue shopping although they are still quite hesitant to lobby national institutions. When exploring differences in the contacts to institutions, we see great variation between institutions according to their position in the policy-making process, but far less difference between the national and the EU institutions. This is particularly noticeable in the case of the executive, where the difference between the top and the working level is as pronounced in contacts to national governments as in contacts to the top and the working level of the Commission.

When we look at the other institutions, national BIAs turn out to be the most proficient multi-level players. Also the location of agencies or regulatory and standardization authorities is not that decisive for national BIAs (see Figure 1 and Figure 2). In contrast, EU BIAs have the tendency to stick more to institutions at

the European level, which is most visible in the gap between contacts to the EP and to national parliaments.

Figure 1: National BIAs: Frequency of contacts at national and EU level (boxplots)

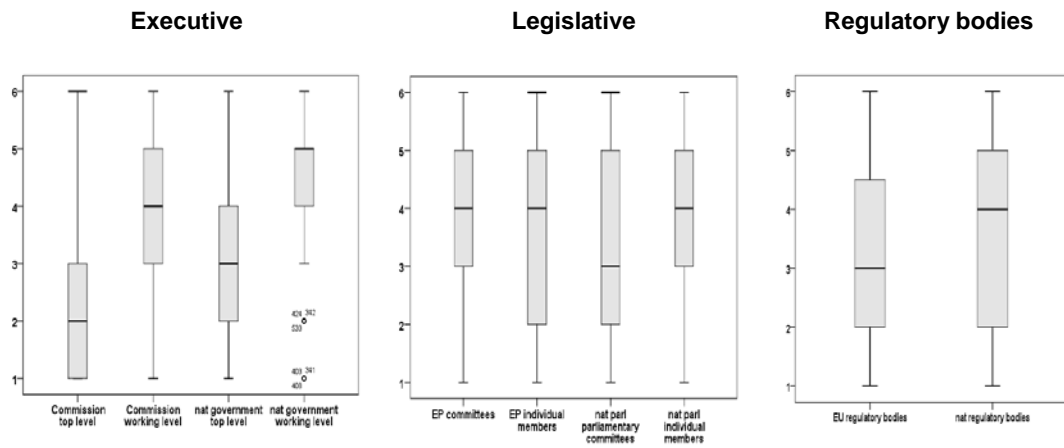
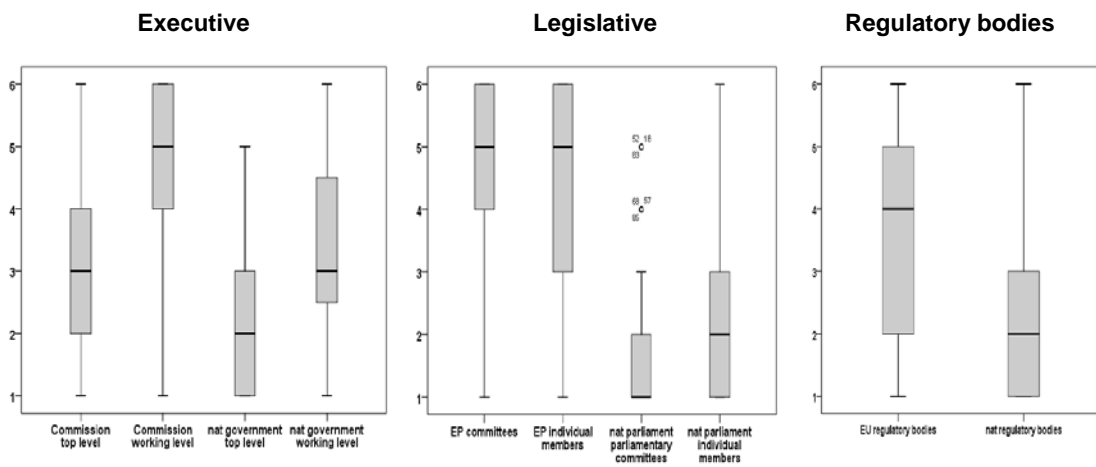


Figure 2: EU BIAs: Frequency of contacts at national and EU level (boxplots)



4 Did the deepening of integration spill over to business lobbying?

The effect of European integration on EU lobbying has many different facets. In the following, we first present how the change is perceived by BIAs. In a second step, we analyse whether and, if so, how business associations have responded to change.

4.1 Change as business associations see it

From the perspective of BIAs, not only the relevance of EU institutions has increased in recent years, but also context conditions have changed considerably.

4.1.1 Change in the importance of EU institutions

The vast majority of national and EU BIAs is of the opinion that the importance of EU institutions, especially the importance of the European Parliament, has increased since the turn of the century (see Table 6).

Table 6: Change of importance of national and EU institutions for BIA activities

EU institutions								
	European Commission		EU regulatory bodies		Council		EP	
	nat BIA	EU BIA	nat BIA	EU BIA	nat BIA	EU BIA	nat BIA	EU BIA
decrease	1.43%	9.57%	0.79%	0.00%	4.72%	6.67%	3.02%	4.35%
the same	31.03%	36.52%	33.68%	40.91%	57.22%	60.00%	28.39%	9.57%
increased	67.54%	53.91%	65.53%	59.09%	38.06%	33.33%	68.59%	86.09%

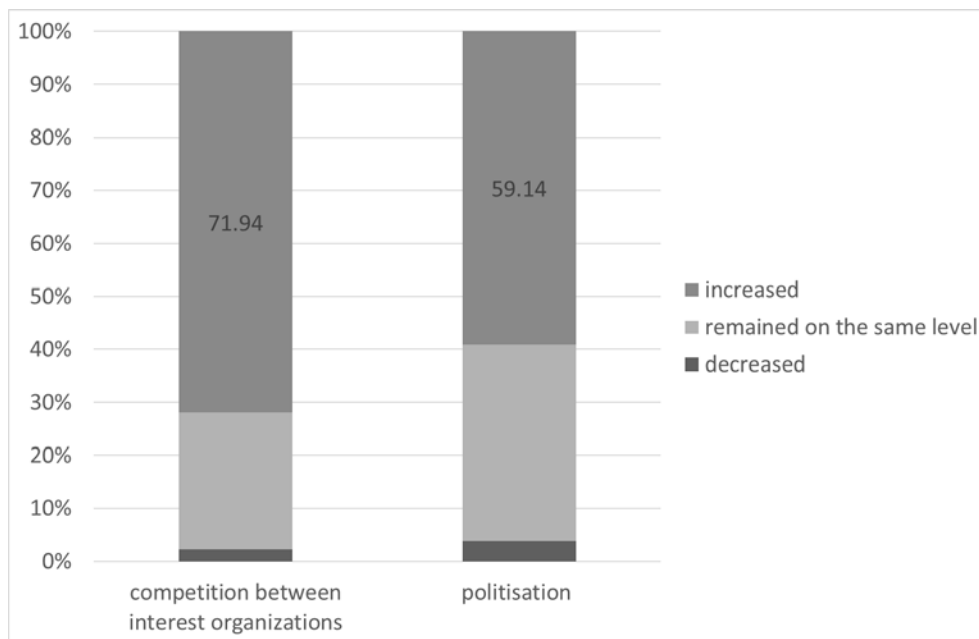
national institutions								
	national government		national regulatory bodies		national parliament		regional governments	
	nat BIA	EU BIA	nat BIA	EU BIA	nat BIA	EU BIA	nat BIA	EU BIA
decrease	15.84%	26.21%	14.36%	23.91%	20.77%	27.17%	24.11%	26.39%
the same	60.64%	53.40%	60.71%	64.13%	62.56%	65.22%	56.44%	56.94%
increased	23.51%	20.39%	24.94%	11.96%	16.67%	7.61%	19.45%	16.67%

Only the importance of the Council is considered to be more or less the same as in the past. The majority of EU and national BIAs also attributes stability to the national institutions. Yet, the views are not uniform: First, on average around a fifth of the BIAs claims the importance of national institutions to have decreased, while only five percent observe a decrease in the importance of EU institutions. Secondly, national and EU BIAs differ in their assessment of national institutions: Whereas national BIAs disagree on whether governments, parliaments and regulatory bodies gained or lost importance, EU BIAs consistently see more loss than gains.

4.1.2 Changes in the conditions for EU interest intermediation

When asked to assess changes in the conditions of interest intermediation, the overwhelming majority (86.81%) expressed the opinion that considerable changes have occurred since the 1990s. More than two thirds of the respondents notice an increase in the competition between interest groups and close to 60 per cent a growing relevance of political considerations in EU policy-making (see Figure 3). About half of the respondents see access opportunities to the European Parliament and close to 40 per cent access opportunities to the European Commission to have improved, while access to the Council is not considered to have changed in recent years.

Figure 3: Observed change of context conditions for interest representation in the EU by national and EU BIAs (%)



4.2 Did business associations respond to change?

On the basis of the 1999 survey data, we explored whether and to what extent business associations have adjusted to changing context conditions. It needs to be emphasized that the comparison does not include Polish BIAs, because Poland was not a member of the EU at the time and, accordingly, not a participant in our first survey.

4.2.1 Living up to shifting competence

Among academia it is widespread consensus that EU institutions have gained importance. We expected business associations to have taken a fresh view on their lobbying strategies and to have adjusted contact behaviour accordingly. The data prove us wrong in regard to the appreciations of having contacts, where we find only minor changes (see Figure 4).

Figure 4: Appreciation of having contacts in 2015 as compared to 1999 (mean; 1 = not significant at all; 6 = very significant)

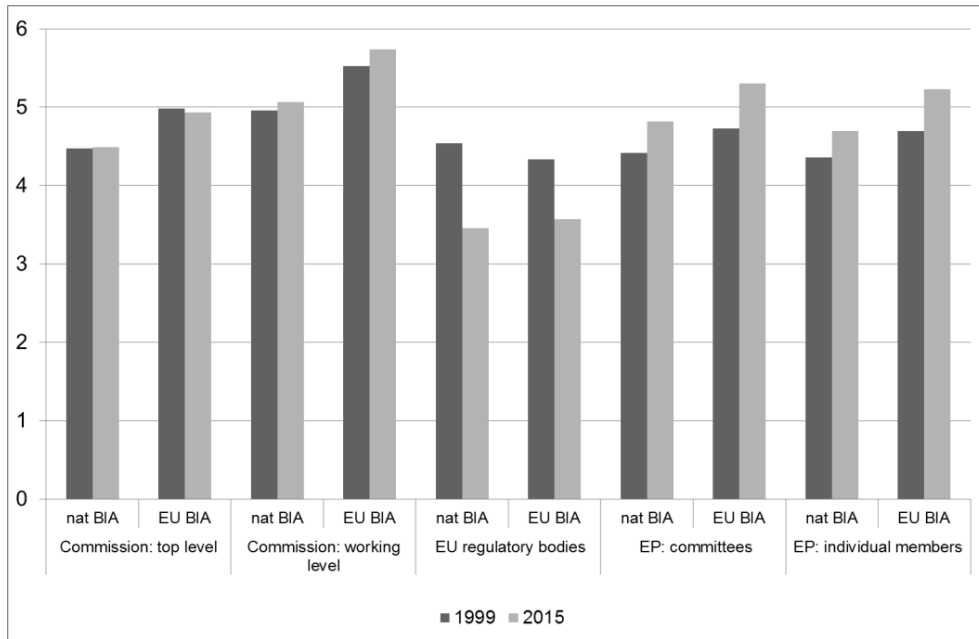
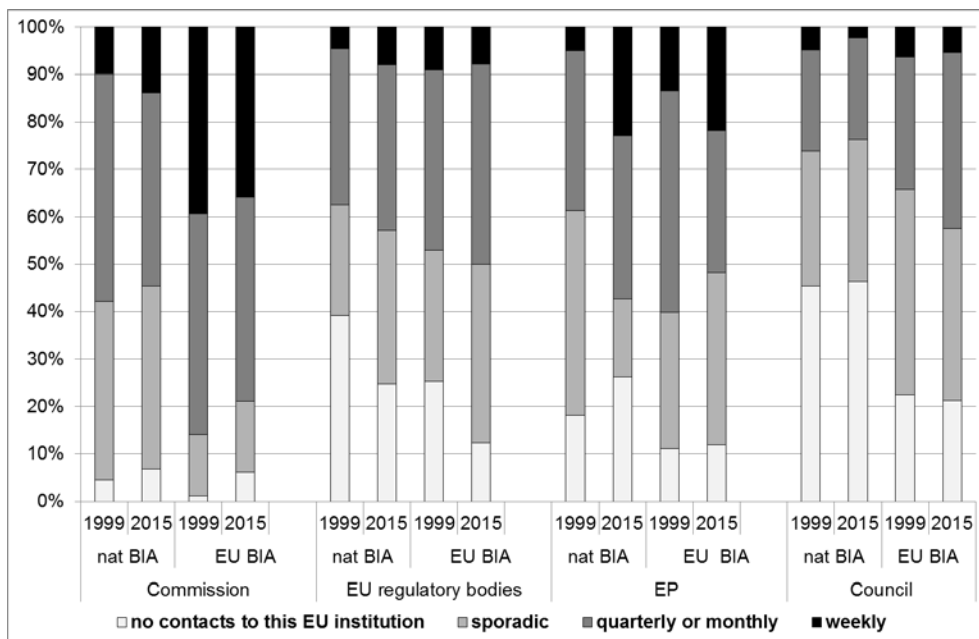


Figure 5: Frequency of contacts of national and EU BIAs at EU level in 1999 and 2015

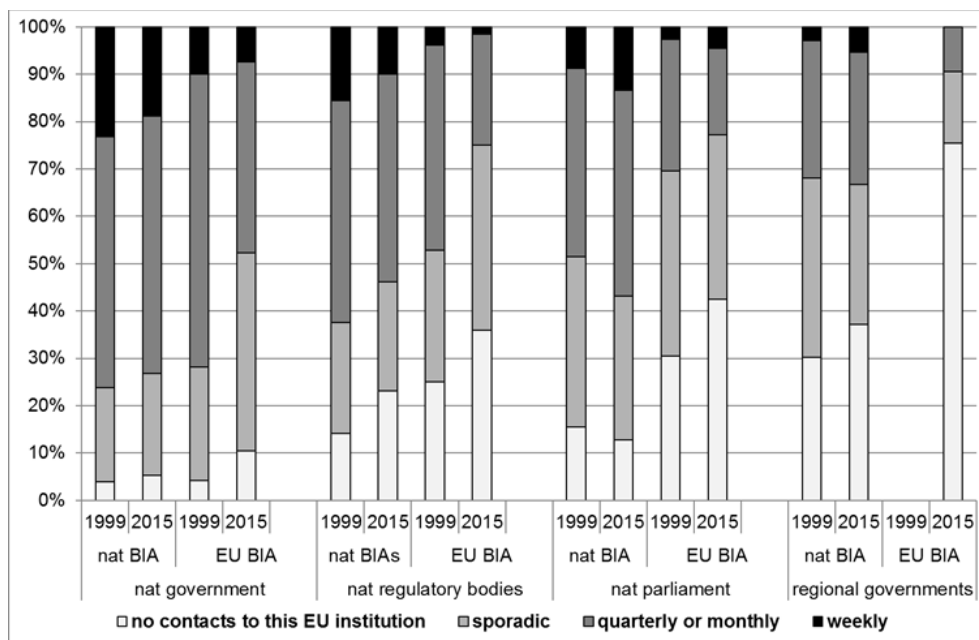


At first sight, the data convey the impression that participation in EU lobbying has hardly been affected either. The percentage of national BIAs from France, Germany, and the United Kingdom having contact to national and EU institutions is about the same as before, and this also holds true for the contacts of EU BIAs to EU institutions. Only in relation to national institutions, EU associations have scaled back their

activities (no contact with national institutions 1999: 33.15%; 2015: 43.70%). Furthermore, a first look at the change of contacts to EU institutions between 1999 and 2015 conveys the impression that the frequency of contacts did not adjust to the shift in importance and improved access opportunities (Figure 5).

Only EU agencies and standard setting authorities attracted more attention across the board, whereas the growing attractiveness of the EP is not that uniform. EU associations, just as national associations, have increased weekly contacts, but more EU associations than before only have sporadic contacts. In addition, change has not been uniform also at national level, but it can generally be said that EU associations have reduced their activities in member countries (Figure 6).

Figure 6: Frequency of contacts of national and EU BIAs at national level in 1999 and 2015⁷



However, when we more closely compare the lobbying behaviour towards parliaments of EU BIAs and national BIAs between 1999 and today, we get a more differentiated picture: EU associations have reduced their contacts to parliaments, while national BIAs have increased their contacts to parliaments, with the effect that both groups are now on an equal footing in relation to the EP, whereas the discrepancies in contacts to member state parliaments have increased (Figure 7).

As to the executive, the change in contact frequency moved in the same direction, though at different speed and with a different effect: EU associations are still ahead of national associations in their relation to the Commission but well behind in contacts to member state governments (see Figure 8).

⁷ In 1999 data on contacts of EU BIAs with regional governments were not collected.

Figure 7: Frequency of contacts with the EP and national parliaments 1999 and 2015⁸

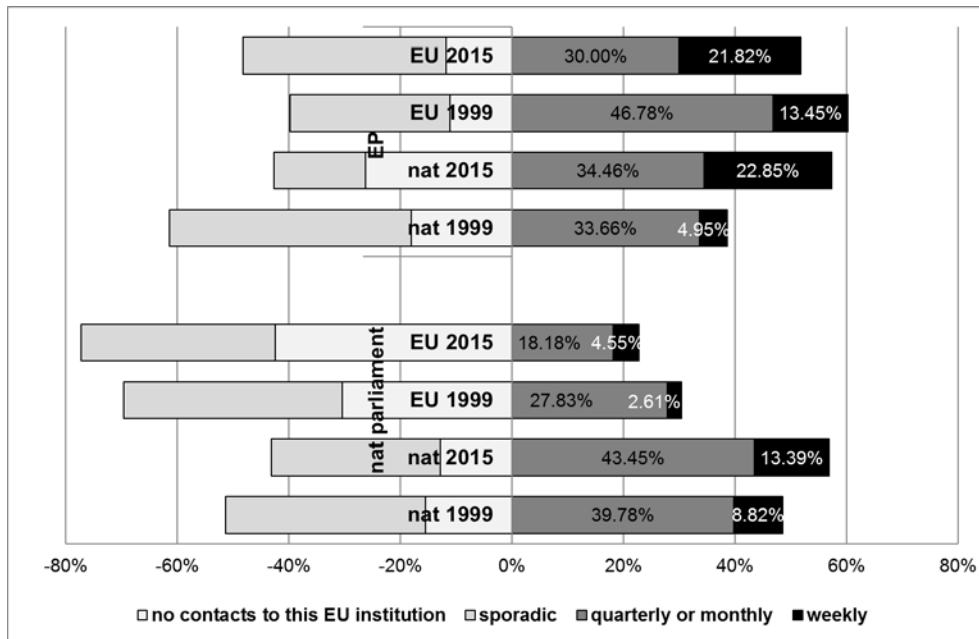
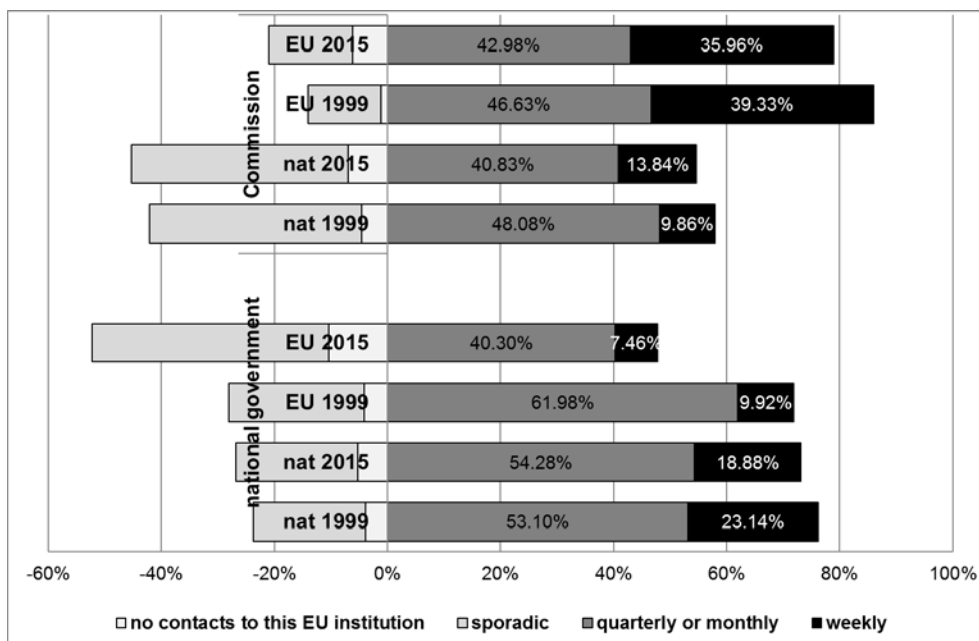


Figure 8: Frequency of contacts with the Commission and national government 1999 and 2015⁹



8 In this figure, we differentiate between highly active BIAs which have lobbying contacts at least four times a year (positive values) and BIAs with no or only sporadic lobbying contacts (negative values).

9 In this figure we differentiate between highly active BIAs which have lobbying contacts at least four times a year (positive values), and BIAs with non or only sporadic lobbying contacts (negative values).

4.2.2 Strong opinions on politicization without noticeable effects

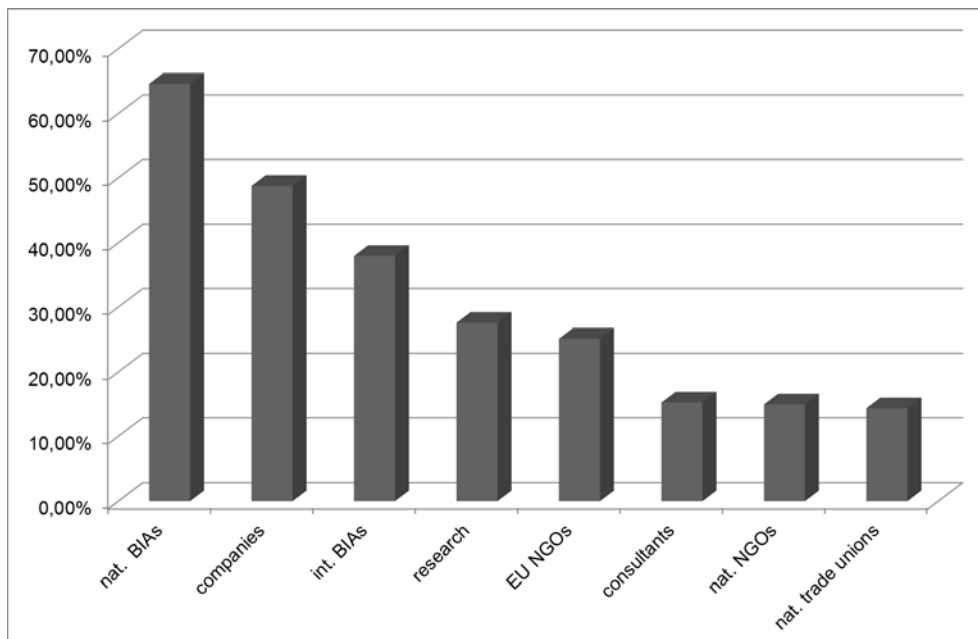
As the majority of BIAs believes that political rather than technical considerations are of increased importance among EU decision-makers (see Figure 3 above), we expected associations to have intensified contacts to political leaders. However, the data do not support this conclusion. We do not find a significant correlation, although the share of associations supporting the view of increased politicization is highest among those entertaining the most frequent contacts to the top level of the Commission and the Council.

4.3 Change in governance: Did the “participatory turn” in EU governance have an effect?

Since the turn of the century, the EU has opted for a more participatory mode of governance. Apart from the respective provisions of the Lisbon Treaty, the Commission (White Paper on EU Governance, 2001) introduced new norms, rules, and consultation procedures to make policymaking more accessible and to give voice to stakeholders.

4.3.1 Coalition preferences

Figure 9: Percentage of national and EU BIAs considering the cooperation with other organizations in the context of EU interest intermediation as “(very) useful”¹⁰



To avoid overburdening of the consultation process, the Commission asks for representativeness and thus provides a new incentive for alliance building. Already at the turn of the century, business associations considered cooperation to be important. The demands of the Commission and the challenges of an increasingly competitive environment (see above Figure 3) reinforced the BIAs’ view but, on average, did not

¹⁰ In this figure we add up the answer options 5 and 6 selected on the 6-point scale from "not useful at all (1)" to "very useful (6)" in order to obtain a clear picture.

spur a strong increase in the appreciation of cooperation. According to our data, the prioritization of cooperation partners has not changed. Business associations had and still have a strong preference for cooperating with other business actors (see Figure 9).

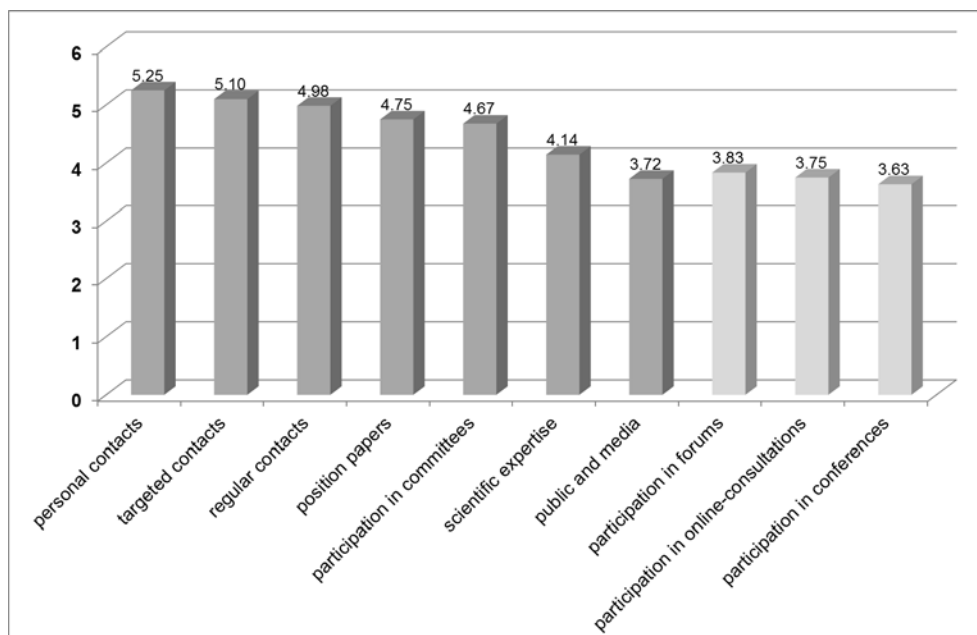
The number-one choice is a national BIA, second comes a company, third an international BIA. When BIAs cross the social structural (cleavage) line, BIAs rather opt for an NGO than for a trade union (Figure 9). There is one exception in this picture of overall continuity: EU NGOs are now in high demand as cooperation partners. This is well in line with our own previous research showing that the EU's commitment to "inclusive consultations" has turned European NGOs to a privileged stakeholder in interest intermeditation.¹¹

4.3.2 Choice of instruments

With the new governance approach, the European Commission also introduced new consultation instruments. Online consultations, policy forums, platforms and hearings as well as conferences have become widely used by most Directorates General. In the view of BIAs, these consultation instruments are less useful than classical instruments of interest representation, and they are clearly considered to be only of secondary rank when compared to personal, targeted, and regular contacts and the submission of position papers (see Figure 10).

Business associations without any great difference do not attribute high value to conferences and forums, and also not to online-consultations, which have been praised for providing easy access and allowing for openness, inclusiveness and transparency. They are about as reluctant when it comes to the mobilization of the public and the media.

Figure 10: Usefulness of traditional and new lobbying instruments (mean; 1 = not useful at all; 6 = very useful)



¹¹ Especially EU business associations now find cooperation with European NGOs almost as useful as with companies, and they also believe it to be more common than before.

5 Common features and differences in EU lobbying

5.1 Common views and experiences

In general, business associations paint a bright picture: They have easy access to information and relations with policymaking institutions both at EU and national level are cooperative (mean value mostly well above 4 on a 1-to-6 scale; see Table 7). EU BIAs find it more difficult to obtain information from the Council and from national governments than from any other institution, but this does not strain their good relations. Only national parliaments do not fit the picture of unbroken harmony. In contrast to the very cooperative relations with the EP, EU BIAs (mean value 2.64%) and also national BIAs (mean value 3.03%) regard relations with the national parliaments to be conflict-prone. We are still looking for an explanation why business associations give the national parliaments such a poor rating concerning the quality of relations.

Table 7: Relationship and access to information (mean)

		EU institutions				National institutions		
		European Commission	EU regulatory bodies	Council	EP	national government	nat. regulatory bodies	national parliament
Access to information (1 = very difficult, 6 = not difficult at all)	EU BIAs	4.85	4.60	3.41	4.74	3.90	4.36	4.19
	Nat. BIAs	4.33	4.54	3.90	4.43	4.16	4.68	4.22
Relationship (1 = conflictual, 6 = cooperative)	EU BIAs	5.23	5.21	4.91	4.99	5.25	5.33	2.64
	Nat. BIAs	4.70	4.67	4.72	4.75	4.58	4.80	3.03

5.2 Variation in behaviour across associations

In contrast to the more or less concurrent views of business, actual behaviour is far from uniform. The data show disparities in the intensity of lobbying as well as in the choice of venues and instruments. We find substantial differences in interest representation between national associations on the one hand and EU associations on the other and even more so among the national associations.

5.2.1 The intensity of lobbying

If we compare the associations' activities and look at the preferred target institutions at EU as well as at national level (see Figure 11 and Figure 12), we see that all move in the same direction although with

noticeable differences in the frequency of contacts. In relation to EU institutions, the working level of the Commission is the first choice; the EP, namely EP committees, and individual MEPs come second. EU associations are the most active ones, quite closely followed by German and French BIAs, whereas the British are closer to Poland's associations in EU lobbying.

Figure 11: Contacts to EU institutions (mean; 1: no contact to the institution, 2: yearly, 3: half-yearly, 4: quarterly, 5: monthly, 6: weekly)

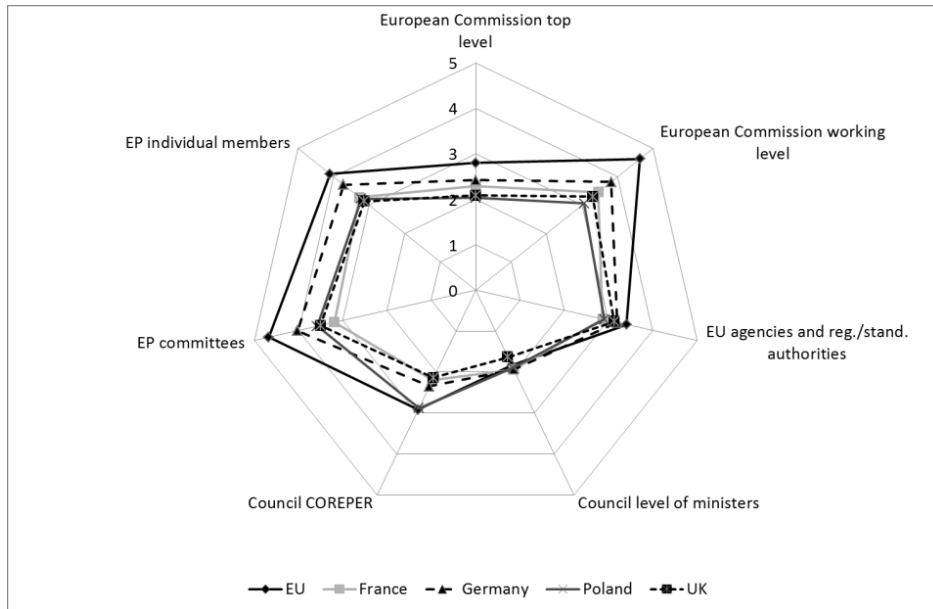
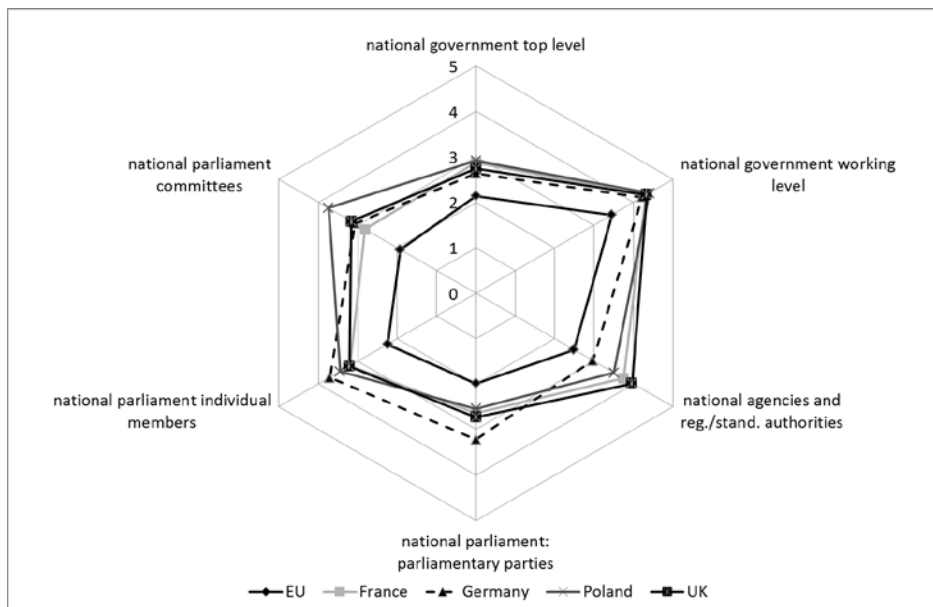


Figure 12: Contacts to national institutions (mean; 1: no contact to this institution, 2: yearly, 3: half-yearly, 4: quarterly, 5: monthly, 6: weekly)



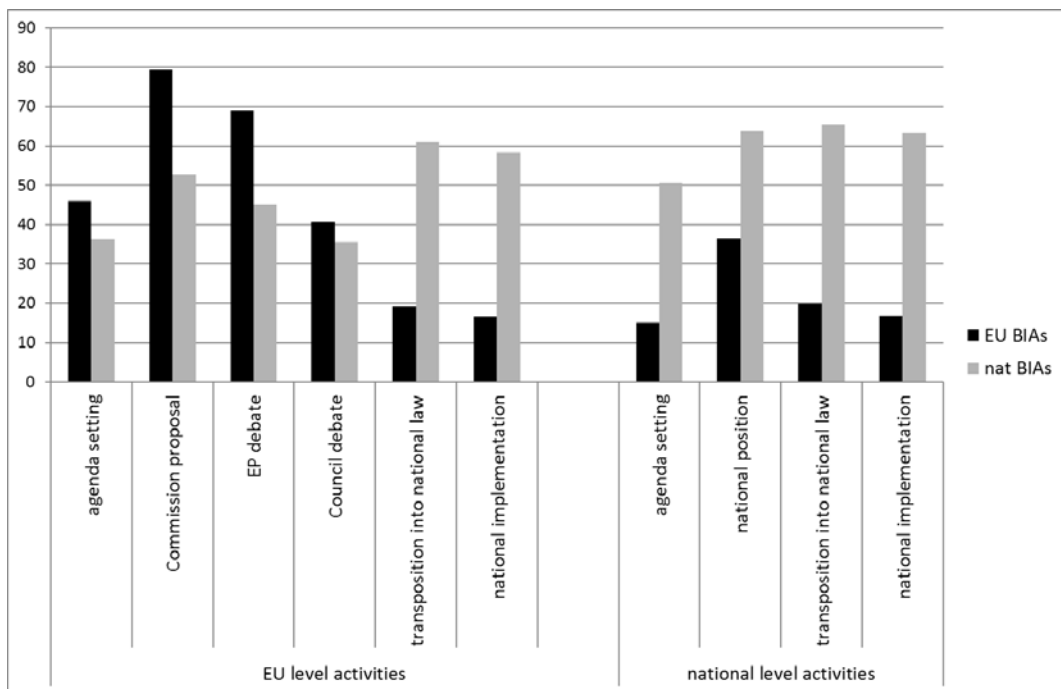
At national level, contact patterns are quite similar though with a reversed order in activities (see Figure 12). EU associations are the least active, and this holds true in relation to all national institutions. National BIAs are much closer to each other although a few variations are worth mentioning: For all of them, the

national administration at working level has top priority and they all have close relations to their national parliaments. They differ insofar as Polish associations entertain more frequent contacts to parliamentary committees and German BIAs have a relatively higher preference for parliamentary party groups. German BIAs also differ from British, French, and Polish associations as they put less emphasis on national regulatory bodies.

5.2.2 The timing of lobbying contacts

Business associations differ not just in the intensity and the venue of their lobbying efforts but also in the timing of interest representation. In general, business associations quite obviously do not follow the manuals' advice to start active lobbying in the early phase of agenda setting but concentrate on the stage of policy formulation and implementation. There is a great variation among business associations both in terms of timing and the choice of target institutions (see Figure 13). Most national BIAs are far more consistent in their lobbying activities than EU BIAs. The latter prefer to focus on the formulation of the Commission's proposals and the debate in the EP and pay less attention to the later stages in the policy cycle. National BIAs are more engaged when EU law is transposed into national law and during implementation; it is noteworthy that, in this stage, they consider it important to intensify their contacts also to EU institutions. Apart from this particular time phase, EU and national BIAs differ greatly in the choice of venues. Even though national associations have a preference for contacting national institutions, they take great care to also address EU institutions, whereas EU BIAs are considerably more focused on the EU institutions than on the national institutions.

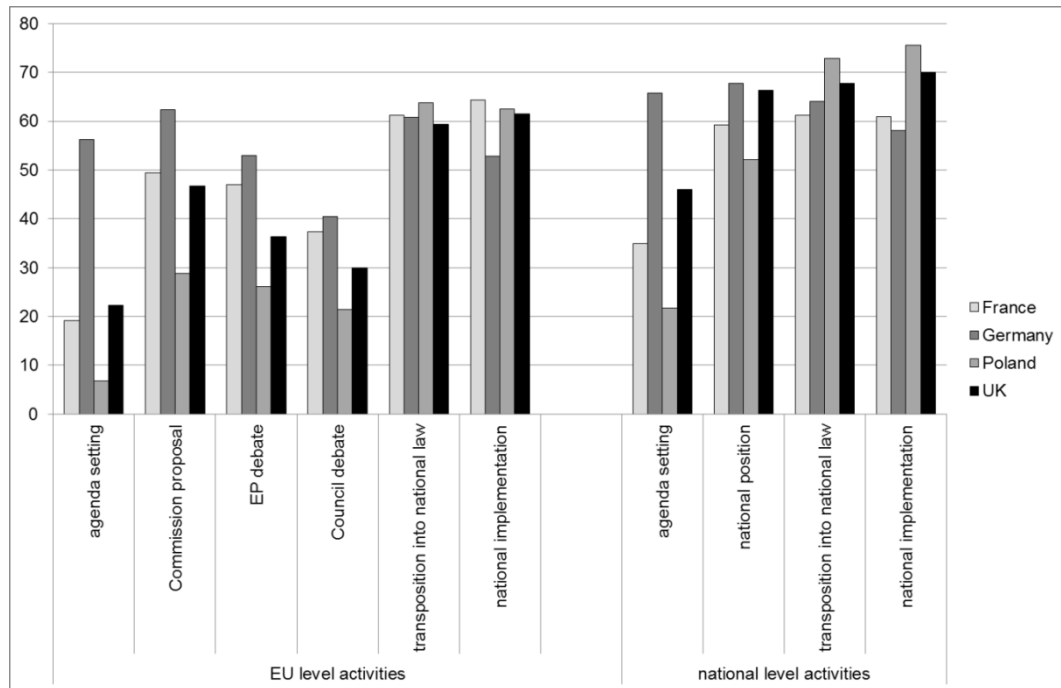
Figure 13: Share of national and EU BIAs “often” active during the EU policy cycle (in %)



Even among national associations, differences in the timing of interest representation are striking (see Figure 14). German associations are the early birds, whereas all other national associations are latecomers. The majority of German BIAs already intervenes when the political agenda is set, and they are also

more often on the spot when the Commission formulates its proposal. Polish BIAs, in contrast, concentrate their activities on the last stage of the policy cycle, when EU law is transposed into national law and implemented, and are far more attentive to what happens at home than in Brussels.

Figure 14: Share of BIAs from France, Germany, Poland, and the UK “often” active during the EU policy cycle (in %)



5.2.3 Varying preferences regarding the selection of instruments and contact partners

The criteria for selecting contact partners are consistent with the image of business associations as actors firmly focused on issues. 75.48% of our respondents consider the “administrative responsibility” as very important for the selection of their contact partners (categories 5 and 6). When contacting EU institutions, all other criteria, such as personal relationship or nationality and language, come second. The British stand out in their appreciation of language, as about half of them say that language is of high relevance when selecting contact partners. Polish BIAs again differ in various aspects: Three quarters of the Polish BIAs compared to less than fifty percent of BIAs from other origin consider personal relationships to be very important, and nearly half of the Polish BIAs also attach high importance to party membership (46.51% in EU contacts and 45.65% in contacts to national institutions). This is in stark contrast to all other national BIAs among which only a minority (between 4.66% and 11.73%) feel party membership to be relevant.

5.3 Relating variations in interest representation to differences in context conditions

Differences between national business associations are conspicuous, but they might result from dissimilarities in national policy styles as well as from an unequal endowment with resources.

5.3.1 Resources which make a difference

It is common knowledge among BIAs and well documented in academic research that the endowment with resources has a significant impact on the intensity and success of lobbying. Budget and staff are valuable resources but also physical presence and the reputation of the association matters. To succeed with interest representation, associations need administrative capacities and the financial means to generate expertise, provide information, and engage in PR activities. A European office is an asset for continuous monitoring and for a swift reaction to an undesirable turn in policy initiatives. In addition to organizational properties, the representativity of an association is another valuable resource and an asset when BIAs ask for ear-time of busy policy-makers.

5.3.2 Financial means

The size of budget and staff is, first, contingent on the scope of an association, and, second, on national origin. In general, large and encompassing associations (peak and umbrella associations) have far more financial means than specialized sector associations, but this is only true for countries of similar size and economic importance. In view of the different economic weight of our case countries, we expected the German associations to be, on average, better endowed than the British and French ones and considerably better off than Polish BIAs. According to our data this is only partly correct as French and German BIAs today are close in terms of budget and also British associations are financially well off. British BIAs differ in so far as the share of financially very strong BIAs with a budget above 1 million Euros is lower than in France and Germany. Polish BIAs are out of line, with strikingly low resources (see Table 8). Indeed, Polish BIAs are financially the least well equipped.

Table 8: Financial resources of associations (in percent)

	France	Germany	Poland	UK	EU
up to 100,000	11.36%	13.41%	54.76%	16.87%	13.89%
up to 500,000	25.00%	22.56%	40.48%	22.89%	37.04%
up to 1 million	20.45%	22.56%	4.76%	28.92%	19.44%
up to 5 million	32.95%	32.93%	0.00%	21.69%	25.00%
more than 5 million	10.23%	8.54%	0.00%	9.64%	4.63%

Our data prove budget to be highly relevant for active lobbying. The correlation between the size of the budget and the frequency of contacts is statistically significant in all the relations of national associations, be it in respect to the national or the EU level, or be it in regard to the top or the working level of institutions (see Table 11 and Table 12 in the Appendix).

Despite the unequivocal statistical results, we have to keep in mind that the size of budget and staff is only an approximation to measure an association's capacity to invest in EU lobbying. National BIAs perform different roles in their domestic environment, and lobbying at home may be more resource demanding in one case than in the other. Thus, we used the European Transparency Register for cross-checking our results. The advantage of the TR is that budget and staff data relate exclusively to EU lobbying. German BIAs employ, on average, more people than the other national BIAs (mean Full Time Equivalent (FTE)

2.38).¹² British (mean FTE 2.23) and also Polish BIAs (mean FTE 2.18) fare better than the average, and only French associations invest relatively less in EU lobbying (mean FTE 1.84). But, again, these figures have to be taken with a grain of salt. The above average figures of Polish BIAs are not consistent with the low budgets reported in our survey. The reason is that only few and rather big Polish BIAs are registered, whereas we find many specialized small associations among the numerous German and British associations registered in the TR.¹³

5.3.3 Presence in Brussels

A very special resource for lobbying EU institutions is a physical presence in Brussels. To be on the spot implies low transaction costs and, accordingly, correlates significantly with more frequent contacts, above all at the EU level (see Table 11 and Table 12 in the Appendix). Having a representation at the site of the EU institutions is definitely dependent on financial means. Thus, it is not surprising that only few Polish BIAs have an office in Brussels (see Table 9). However, the size of the organisation's budget alone does not explain why so many German associations, including several small and financially less potent BIAs, have a European office, compared to French and British associations. Shorter geographical distance and fast train connections from London and Paris to Brussels may make a difference, but interviews confirm the additional importance of different lobbying traditions. German associations evidently find cooperation with law firms and consultancies distinctly less useful than the other national associations. However, this does not explain why far less British and French BIAs have a representation in Brussels today than at the turn of the century, whereas the number of German BIAs with a European presence has increased.

Table 9: National BIAs with an office in Brussels

BIA office in Brussels	France	Germany	Poland	UK
2015	25	82	2	9
1999	35	78	n. i.	26

5.3.4 Representativity

A high rate of representativity increases the association's legitimacy to speak in the name of business. Thus, apart from the pleasant side effect of increased revenues, BIAs are interested to recruit as many members as possible. Most respondents claim to represent a substantial share of the potential membership though with some significant deviations. A considerable number of British BIAs only represent a part of their potential members, and comparatively less Polish BIAs have an organization rate above 75% (see Table 10).

Our data confirm the importance of representativity. We find statistically significant correlations between representativity and contact frequency particularly in relation to politically accountable institutions such as the top level of government, parliament and, in addition, to the Commission, which is committed to have the support of "civil society" (see Table 11 in the Appendix).

¹² According to own calculations on the basis of a revised list excluding all organizations which are not business or not national associations, the mean Full Time Equivalent (FTE) of staff employed is 2.38 for German BIAs compared to an average FTE of 2.10 for all business associations from the 28 member states.

¹³ After excluding incorrect entries, the TR comprised 194 German, 122 British, 67 French, and 26 Polish business associations by mid-October 2015.

Table 10: Representativity of associations (in per cent)

	France	Germany	Poland	UK	EU
1-25%	7.87%	6.49%	13.64%	21.59%	6.36%
26-50%	17.98%	11.35%	11.36%	14.77%	9.09%
51-75%	22.47%	28.65%	36.36%	19.32%	26.36%
76-100%	51.69%	53.51%	38.64%	44.32%	58.18%

6 Conclusions

The EUROLOB findings can aptly be summarized by saying that we see new and not-so-new trends in EU advocacy. Business associations more than ever attribute high importance to maintaining contacts to all institutions having a say in policy-making and have turned the EU into an arena of intensive lobbying. The deepening of European integration, with the growing importance of EU law-making, did not make national EU lobbying obsolete. On the contrary, nearly all national business associations are engaged in active interest representation and, above all, have intensified their contacts to EU institutions. More than ever, EU lobbying is a multi-level affair. National associations reach out to Brussels and, in relation to the EP, are now as present as EU associations. The latter, on their part, do not limit their activities to their home base but also target national institutions.

The overall picture is clear: Business associations choose their contact partners not according to jurisdiction but according to function and accessibility. Institutions with a high impact on EU policy-making and open to stakeholder consultation attract most of the contacts. Thus, both the working level of the Commission and the working level of member state governments have top priority for EU lobbying, just as the committees of the European Parliament.

When we look for change in lobbying strategies, the data convey the impression of steadiness. With the exception of the EP, we see no dramatic change. The EU institutions have, on average, attracted more frequent contacts, whereas national institutions hardly did so. In particular, EU associations reduced their activities in member countries. Only at closer scrutiny it is apparent that change has occurred and is far from uniform. This even applies to the EP which, at first sight, gained so much attraction thanks to its political upgrading through the Lisbon Treaty. EU associations, just as national associations, have increased weekly contacts, but also the share of EU associations with only sporadic contacts has increased. It is interesting to note that national parliaments obviously profited from the raising importance of the EP; they are the only institution at national level which now attract more attention from national BIAs than before.

The comparison over time shows that the multi-level character of EU lobbying and also the country-specific profiles of the involved business associations persist. The divergent features which we noticed in our first survey at the turn of the century are still visible today. The pluralistic system of British associations and the greater readiness of British business to turn to lobbying professionals is as distinct as the German disposition to cooperate in a hierarchically structured system. German associations continue to be the early birds and pursue an active EU-level lobbying strategy, which cannot be explained solely by higher financial resources. French associations still rely on political intervention in a later stage of policymaking and have a certain preference for the national route of interest representation. In this respect, French BIAs are close to the Polish associations. The latter stand out in terms of giving high preference to personal relations and to

the party-political affiliation of their lobbying addressees. According to our data, European convergence is not on the horizon.

Lobbying in terms of the use of instruments turned out to be business as usual. Business actors stick to the proven mix of personal, targeted, and regular contacts as well as position papers. The mobilization of the public and the media is only of secondary importance for all groups. The new consultation instruments, which the European Commission introduced in the past decade to make EU governance more open, transparent, and participatory, did not receive a very positive response among the professionals. Online consultations, policy forums, platforms and hearings, as well as conferences rank lower than any of the traditional instruments of interest representation.

When examining context conditions which may best explain variation in lobbying behaviour, our data confirm the high importance of resources and representativity. We looked at the impact of budget, representativity, and a Brussels presence on the contact patterns of national associations. The findings concerning representativity confirm the general view: Budget is important for contacts to all institutions and all institutional levels, disregarding geographical location or administrative level. Representativity matters in relation to politically accountable institutions such as the top level of government and parliament; it also counts in relation to the Commission (top and working level), which is committed to consulting “civil society”. Finally, regular presence in Brussels definitely spurs contacts to the European institutions with the exception of European regulatory bodies. Indeed, national BIAs with a representation in Brussels are especially active multi-level players, because, in addition, they have increased contacts with the top level of the national government, the regional government, and they also lobby more intensively the national parliament on EU affairs.

Bibliography

For further reading please consult the project website:

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Appendix

Table 11: Regression analysis: Frequency of contacts with EU-level institutions

	European Commission top level	European Commission working level	Council top level	Council working level	EU agencies, reg. & stand. authorities	EP committees	EP individual members
	B	B	B	B	B	B	B
(Constant)	0.341	1.927 ***	0.080	-0.067	1.398 ***	1.424 ***	1.224 **
Nationality (Ref. Germany)							
France	0.062	-0.222	0.111	-0.077	-0.392	-0.619 **	-0.305
Poland	0.336	-0.113	0.590	1.556 ***	0.021	0.618	0.594
United Kingdom	-0.029	-0.115	-0.179	0.078	0.007	-0.233	-0.262
Structural variables							
Office in Brussels	0.528 **	0.745 ***	0.384 *	0.706 **	0.014	0.642 **	0.649 **
Budget	0.248 ***	0.181 **	0.220 ***	0.288 ***	0.204 **	0.291 ***	0.305 ***
Representativity	0.207 *	0.212 *	0.203 *	0.236 *	0.302 **	0.288 **	0.232 *
R²	.198	.189	.176	.221	.109	.266	.238
N	234	251	224	231	241	238	247

* Significant at $p < 0.05$; ** Significant at $p < 0.01$; *** Significant at $p < 0.001$

Table 12: Regression analysis: Frequency of contacts with national institutions

	national government top level	national government working level	nat. agencies/ reg. & stand. authorities	nat. parliament committees	nat. parliament parliamentary parties	nat. parliament individual members	regional governments
	B	B		B	B	B	B
(Constant)	0.748 *	2.621 ***	1.653 ***	1.382 ***	1.289 ***	2.053 ***	1.621 ***
Nationality (Ref. Germany)							
France	0.274	-0.096	0.594 *	-0.197	-0.582 *	-0.445	-1.188 ***
Poland	1.041 ***	1.043 ***	1.001 **	1.742 ***	0.411	0.812 **	0.628 *
United Kingdom	0.390	0.357	1.041 ***	0.535 *	-0.158	-0.121	-0.491 *
Structural variables							
Office in Brussels	0.457 *	0.212	-0.212	0.604 **	0.592 *	0.567 *	0.445 *
Budget	0.258 ***	0.335 ***	0.204 ***	0.287 ***	0.318 ***	0.264 ***	0.180 **
Representativity	0.187 *	0.060	0.194 *	0.072	0.105	0.091	0.150
R²	.152	.193	.120	.171	.178	.137	.172
N	290	308	285	296	296	303	290

* Significant at $p < 0.05$; ** Significant at $p < 0.01$; *** Significant at $p < 0.001$