In Search of Access

A Case-Study of Subnational Interests Access to the Institutions of the European Union

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Abstract

Lobbying within the European Union is an everyday occurrence that provides administrators and politicians with information for policy-making and gives organized interests a chance to represent their views. This thesis focuses on subnational interests experienced amount of access to the three major institutions in the EU; the Commission, the Parliament and the Council.

The purpose of this thesis is to test if the 'Logic of Access', a theory developed to explain business interests access to the institutions of the EU, also could be used to explain subnational interests experienced access to the EU and to achieve new insights. In addition, three other theories are looked upon to supplement the analyzing of the case and to better explain the results. By conducting interviews and a questionnaire with actors associated with subnational interests, as well as reviewing literature within the area of subject, initial hypotheses to the study will be answered.

The results imply that the Logic of Access provide good explanation of the experienced level of access but that more research is needed to establish the relationship between organizational form and information supplied when subnational interests is the case study.

Key words: European Union, lobbying, access, subnational interests, Brussels offices

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List of Abbreviations

CoR Committee of Regions

COREPER the Permanent Representatives Committee

DG Directorate General

EESC European Economic and Social Committee

IDEI Information of Domestic Encompassing Interest

IEEI Information of European Encompassing Interest

EC the European Commission

EK Expert Knowledge

EP the European Parliament

EU European Union

LOA Logic of Access

MEP Member of the European Parliament

NGO Non-Governmental Organization

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1 Introduction

Lobbying by different interest groups to gain influence on the policy formation is an obvious matter of course in modern politics. Lobbying provide information to policy-makers and contribute with a variety of views within certain policy areas. Therefore, there exist a symbiosis between interest groups and policy-makers. Lobbyists seek possibilities to influence the agenda while policy-makers seek information and knowledge concerning certain issues.

With the development of the European Union (EU) and an enlarged field of work ascribed to it, many policy areas are treated at the EU-level. With it, the activities of lobbyists have increased. The main lobbyists in the EU can be divided into three distinctive interest groups: private interests, public interests and governmental interests (Bomberg et al. 2008: 93). They are divided by their interest pursued and subject matter.

The actual influence of lobbyism is difficult to measure. The policy process of the EU is complex and takes place at several levels. It is not easy to determine who is responsible for a decision and how much influence the different actors have had during the process. A more feasible method might be to measure the degree of access, instead of influence, to an institution. Access is a necessity to carry out lobbying. It can be conceptualized as the opportunity to pass on information to decision-makers and to have that information considered in the policy process. Access can therefore be the tool to carry out lobbying.

1.1 Purpose and Problem Definition

The purpose of this thesis is to explore if the theoretical framework 'Logic of Access' (LOA), first developed to explain the lobbying of private interests (business groups) in the financial sector, could be used to explain subnational interests groups' access to the institutions of the EU. This approach is interesting since most subnational interest groups are driven by regional and local interests but still need access to be able to pursue their interest. The thesis' key questions, which I will try to answer, are thus:

- Does the theoretical framework of the 'Logic of Access' provide reasonable explanation of the amount of access subnational interest groups experience to the Commission, the European Parliament and the Council of Ministers?
- Which are the significant differences in form of 'accesses' between subnational interest groups and private interests?

In this thesis I aspire to look closer at the actual access subnational¹ interest groups might have when lobbying to influence the policy process. There is a lot of research made on lobbyism in the European Union. Many of these studies have dealt with value oriented matters of lobbyism (see Karr 2006; Mazey & Richardson 1993). Among the researches main focuses has been questions about the 'be or not to be' of lobbyism, the discussion of the democratic deficit in the EU when dealing with input and output legitimacy in order to link civil society to the institutions of the EU, and of course, the transparency issue of lobbyism.

The reason for why I have chosen to investigate the research questions posed above is to explore and to achieve new insights with a theory that has not previously been tested on subnational interest groups. I find that applying the theory to a new case is both interesting and valid, since private business groups and public interest groups often lobby within different policy areas or try to aim for opposite goals in a particular policy formation.

Except for the use of 'Logic of Access' I will, when justified, use other theories of lobbyism when this can add explanatory power. I do not believe that this thesis can analyze the entire picture of public interest groups lobbying, but I do strive to shed an extra light on this phenomenon.

1.2 Brussels Offices as a Subnational Case

To test the theory I will look closer at the Brussels offices of subnational groups. In recent years, subnational governments have established independent offices in Brussels which lobby, gather information, and network with other actors of the local, regional and EU-level (Hooghe & Marks 1996: 82). These offices are the right hand of local and regional authorities at the EU-level and they range from poorly funded bureaus, staffed by one or two officers, to large quasi-embassies (ibid: 83) able to specialize in certain policy areas. They represent different levels of subnational actors and may include small and medium-sized companies and even universities (Berg & Lindahl 2007: 48). Differences in capacity and resources are often related to the regional tier within the single member-state and hence the number of offices from member-states differs variably. The Brussels offices will be our case study of subnational interests' access to the EU since these are good examples of subnational mobilization and are the direct link between single regions and municipalities in Brussels. This must however not be the case; subnational interests must not establish an office in Brussels as a gate to the EU. They are able to pursue influence from home base.

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¹ In EU literature the following terms of regional and local lobbying at the EU-level have been used: Regional and Local Interest Groups, Territorial Interest Groups and Subnational Interests Groups. Throughout this thesis I will use the term Subnational Interest Groups since this term include a variety of constellation of different regional and local interests and association among these.

On many issues, subnational interests are intensely competitive. They are often in competition of EU attention and this leads them to contend for prior knowledge and privileged access to information and enter network coalitions (ibid: 86).

1.3 Outline of the Thesis

Chapter 2 presents the theoretical framework of the Logic of Access (Bouwen 2002), the theory of which I aim to build my study. The concepts of the theory developed by Bouwen are here laid out but also a further discussion of the theory delimitations and adaption made to this study. I also shortly present other theories on lobbyism and subnational mobilization. In chapter 3 the method and material of the study is presented. Difficulties and possibilities of the method at hand are looked upon and the operationalization will be explained. I also present primary and secondary sources that sum up the material of the thesis. In chapter 4 the findings and results are revealed. This is followed by chapter 5, further discussing and analyzing the results. In chapter 6, I will conclude my study with a conclusion about the major results.

2 Theoretical Points for Departure

2.1 The Theory: Logic of Access

The theory of use in this thesis is the 'Logic of Access' (LOA). The theory, developed by Bouwen (2002; 2004), examines interest group lobbying in the agenda-setting and policy-making process of the EU. It builds on previous studies within the field of business lobbying where focus generally been put on the lobbyist ability to influence the policy process. To measure influence has proven to be difficult. LOA offer another approach.

LOA provide the notion that connections between interest groups and decision-makers can be quantified and measured when *influence* is replaced with *access*. Access is dependent on the organizational form of the interest group. To measure access we need to know how and when information is conveyed. This can also be hard to measure but much more possible when compared to influence. Access does not necessarily mean influence but access is a necessary condition to gain influence. Access is therefore considered a good indicator of influence (Bouwen 2002: 366).

Another important conception is the range of approach that LOA offers in two ways. First, the three major EU institutions are investigated simultaneously to better explain the logic of interest politics at the European level. Second, the various organizational forms which interest groups can take in the EU are the unit of analysis (Bouwen 2002: 367). These interest groups are divided into four categories; *individual interest group*, *national association*, *European association* and *consultant*. This categorization is made on the basis of how and where they operate. A interest group choice of organizational structure is dependent upon three variables; the size of the interest group, the economic strategy of the interest group and on the domestic institutional environment of the interest group (Bouwen 2002: 374).

According to LOA, in order to receive access one must offer access goods. The characteristic feature of access goods is information. Information, supplied by lobbyists, and access, supplied by decision-makers are goods on a common market. They are therefore subject under the law of supply and demand, like goods on any given market. The supply of access goods or information can be divided into three categories; expert knowledge (EK), information about the European Encompassing interest (IEEI) and information about the domestic encompassing interest (IDEI). The term expert knowledge involves detailed information about issues and technical know-how. The term encompassing

involves public opinion or the need and interest of a group. The higher quantity of interest parties in a specific issue, the more encompassing it gets (Bouwen 2002: 369).

With the theoretical background, the explanatory power of the theory can be presented: If information and access is under the law of supply and demand, it is possible to determine which EU institution an interest group would be most successful lobbying. This depends on which category of organizational form that the interest group represents and what kind of information it supplies. It must also be determined which EU institution that has the highest demand for such information. According to this, given one interest group, it is possible to derive what kind of information is supplies, and given an EU institution, it is possible to derive what kind of information it demands. By assessing this knowledge we can determine which interest group that will trade information for access with which EU institution (Bouwen 2002: 382).

Bouwen establishes a ranking of the access goods best provided by the different organizations. This is done with the help of previous studies within access theory. According to this ranking system which represent the supply side, an individual organization best supply the access good of Expert knowledge. The national association best supply the information of encompassing domestic interests and European association best supply information about the encompassing European interests. A consultant may supply different types of information depending on whether its client is an individual organization, national association or a European association (Bouwen 2002: 378).

On the demand side, there also exists a ranking system of the EU institutions preferred information (see figure 1). This is derived from the legislative role of each EU institution. It is thought of as the formal powers of each institution and their timing of intervention in the process. The demanded access good of the Commission is Expert knowledge. The most demanded access good of the European Parliament is information about European encompassing interests and the Council has the highest demand for information about domestic encompassing interest.

With these hypotheses of the kind of access good supplied by which actor and demanded by which institution it is possible to draw conclusions about where these institutions would turn for information and who they would most likely grant access to the policy process. Bouwen continues this by also listing, except for the crucial access good, even the second best and so on, for each institution.

Figure 1: Access Goods as demanded by EU-institution according to Bouwen's hypotheses. Number 1 is EU-institution that perceives this information as a 'critical access good', a critical resource for its fulfillment of their formal legislative role (Bouwen 2002: 378).

| Information of Domestic | Information of European | Expert Knowledge: |
|-------------------------|-------------------------|-------------------------|
| Encompassing Interests: | Encompassing Interests: | |
| | | |
| 1. Council of Ministers | 1. European Parliament | 1. European Commission |
| 2. European Parliament | 2. European Commission, | 2. European Parliament, |
| 3. European Commission | Council of Ministers | Council of Ministers |

2.2 Other Theoretical Views on Lobbyism

Since the LOA is mainly developed to explain business interests' access to the European Union, representing the non-business interests is public interests groups such as NGOs or trade unions, and subnational interests is often a mix between business and non-business. The subnational interests include for example: state governments of the countries of federal systems, regional councils of Spain or Italy, local government bodies of Sweden and Denmark, and various intermediary associations of local authorities, communities, cities and regions (Hix 2005: 220).

To give a comprehensive image of lobbyism, some other theories will here be looked upon. These theories are used to give conceptual background to the 'Logic of Access' and the lobbying situation in the European Union, and to give added value to the analysis.

2.2.1 Lobbying at different levels - Multi-Level Governance

The development of Brussels offices established a system of 'multi-level governance', where policies are made through interaction between regional, national and European-level authorities. The concept was first developed to describe the role of the regional authorities to the structural funds but have evolved towards a general model of EU decision-making where subnational interests have been incorporated into other EU policies (Hix 2005: 222). It should be noted that it is difficult to extrapolate a general theory based on interest intermediation in the area of regional policy-making (ibid).

The concept of 'governance' is here defined as the continuous political process of setting explicit goals for society and intervening in it in order to achieve these goals (Wiener & Diez 2004: 99). Governance is about setting goals and making decisions for an entire collectivity.

The main characteristic of the multi-level governance is that policies can be shaped at different levels. This is due to the institutional set-up of the EU. The pillars of the EU consist of both supranational and intergovernmental levels of decision-making, and consultation with civil society of different constellations. This creates power-sharing between different levels, with large variations between policy fields (Wiener & Diez 2004: 102). A result of these characteristics of the institutional set-up is that EU politics are not characterized of neatly separated layers of hierarchy but by negotiations among independent actors and institutions (Wiener & Diez 2004: 103). Without neglecting the importance of states as actors, the multi-level governance avoids state-centrism and the treatment of the EU as only operating at the European level. This offers a more pluralistic view where different agendas and interests are contested (Rosamond 2000: 110-11).

Multi-level governance explains why LOA investigates three institutions. Successful lobbying depends on several strategies towards several institutions and its administrators at different levels. Therefore 'influence' becomes an

individually perceived concept and hence access is a better tool to describe lobbying opportunities.

2.2.2 Explaining information exchange - Policy Analysis

The Policy Network Analysis was developed to make sense of internationalized policy-making environments. The image of networks is an attempt to depict the highly segmented nature of EU policy-making in which consultation, expertise and technocratic rationality are the means used to cope with the regulatory ticket of day-to-day policy making. However, Policy Network analysis is no agreed 'theory' that leads us to predictive claims about EU policy-making. Although, the analysis of policy networks is consistent with the multi level-governance view that power has become dispersed within the EU policy and that the EU system itself is not structured hierarchal (Rosamond 2000: 123). Policy networks are usually understood as venues for the pooling or exchange of information and resources. These networks are useful since they give actors access to information and resources. The information supplied and demanded helps to legitimize the decisions made by actors by giving them external source of 'scientific' authority, and helps to influence the interests of actors (Rosamond 2000: 125). In sum, policy network analysis can help to explain EU policy outcomes in a particular sector since it may reflect the technocratic rationality or the political agenda pursued by certain key actors (Wiener and Diez 2004: 121).

The critic of this 'theory' is often based on its lack of explaining why some actors are mutually dependent or neglects the power of classical EU actors (Wiener & Diez 2004: 127). The technocratic atmosphere of the networks will possibly create expert knowledge among its participants. Subnational actors that engage in policy networks do this to be able to supply specific access good demanded by the Commission.

2.2.3 The Logic of Collective Action

The notion of collective action is less than a theory and more a description of new opportunity structures to pursue ones interests and challenging conventional European level state-society relations. 'Collective action' explains the formation of associations at the European level. Mancur Olson (1965) provided this image of the decision about participation with groups of shared interests. Potential participants make rational calculations about their best interests. If there is no net benefits then the potential contributor will free ride. Members of a group will not act unless a separate incentive, that is distinct from the achievement of the common interests, is offered to the members individually. This is what makes them share the cost of pursuing group interests (Greenwood & Aspinwall 1998:

35). This means that group or collective mobilization depends on more than group success for the individual member.

This is mainly built on cost-benefit analysis. The incentives to engage in collective action are greater for individuals in smaller groups than for individuals in larger groups. The cost of participating is lower for smaller groups while the gains will be higher and vice-versa when it comes to larger groups (Greenwood & Aspinwall 1998: 45). This notion help explain the various groups constellation one might find at the European level. Smaller actors are less likely to be able to supply the access good demanded and thus participation is a must to possess access goods and gain access. The comparative advantage of the more resourceful actor will diminish because of the common interests created, this access good is of broader information that is more suitable for the Parliament.

2.3 Theoretical Adaptation and Delimitations

What is apparent with the theory of the LOA is that its framework is especially developed to analyze business interests in a specific sector, which was its original purpose. Therefore, in an initial phase, some impediments must be met.

The theoretical adaptation is made by constructing the LOA to the lobbying behavior of subnational interests. Subnational interests consist of actors from local and regional authorities in EU member states. Subnational interests may also be associations among these local and regional actors. This is often the case when it comes to specific policy areas that require cooperation. Lobbying by subnational interests can take place at multiple levels which makes it difficult to create a general theory of lobbying behavior. But it is generally understood that information is vital to receive access to policy-makers. Subnational interests do possess specific knowledge and information in some policy areas. They may use this to pursue lobbying strategies. The information supplied is of same definition as the three types of access goods developed in LOA: Expert Knowledge, IEEI and IDEI. The access goods are in return exchanged for access to the institutions of the EU. Depending on the type of access good offered, there exists a higher probability of granted access to an EU-institution demanding that access goods (see figure 1).

To be consistent with LOA, the channels of representation that is most important for subnational interests, is the Council, Commission and Parliament. The other The Committee of Regions (CoR) and Economic & Social Committee (EESC) is not included as possible representative channels since these institutions plays a weak role in the EU policy-making process and has therefore been deemed insufficient (Bomberg et al. 2008: 100). The CoR and EESC is nonetheless important platforms for networking.

The organizational structure of the lobbyists will be of a lesser matter in our analysis. The division of business interest into national or European associations is not analyzed here, neither is the role of the consultant met. However, it is understood that subnational interests have different capacities to pursue lobbying.

The organizational structure of subnational interests is not clearly defined as for private interests but differences between subnational interests does exist concerning resources and legal independence. This depends on constitutional arrangement with regions or municipalities among EU member states² from which the subnational interests is representing. Subnational interests of EU member states with a federal system often have a broad range of policy competences and ability to work independently (Hix 2005: 222) when comparing with regions of less resources from unitary EU member states. Except for the various types of member state decentralization that exist, it is difficult to make a distinction between subnational public authorities and subnational interests since subnational authorities work to attract, promote and protect key interests within their domain (Greenwood 2007: 159). The Brussels Offices of subnational interests often consist of a mix of these interests. This needs to be taken into consideration when applying LOA.

Because of the complexities of subnational lobbying the LOA cannot in itself explain the various processes that take place when pursuing interests in EU policy-making. In this theoretical adaptation we accept the notion of a multi-level system of governance does exist in the EU. Therefore subnational interests must lobby towards different EU-institution since there is no single important institution concerning the EU policy-making process. This is due to the mix of supranational and intergovernmental institutions. The close relationship between subnational interests and the Commission is because of this institution supranational tendency. However, the power-sharing between different levels creates variations between policy fields and we may expect that subnational interests are forced to lobby both the Council and EP as well.

The LOA is rather consistent with the theory of Policy Analysis. Information is supplied and demanded which creates information exchange and access. The pooling and exchange of information creates a setting where subnational interests may deal with other institutions or actors other than the three of focus. LOA helps explain which information subnational interests much work with to receive access.

Subnational interests must sometime engage in collective action with other subnational interests to create information that is demanded by a certain institutions. This helps explain why subnational interests enters different types of associations or organizations when pursuing their interest, it may create greater opportunities for access. A simplified model of the interaction between the EU and subnational interest can be seen in figure 2.

² Federal member-states in the EU: Germany, Belgium and Austria. Decentralized unitary member-states: France, Spain and Italy. Unitary member-states: Sweden, Denmark, Finland, the Netherlands, United Kingdom, Ireland, Portugal and Greece. Newer member-states from EU-27 are not accounted for (Hix 2005: 220).

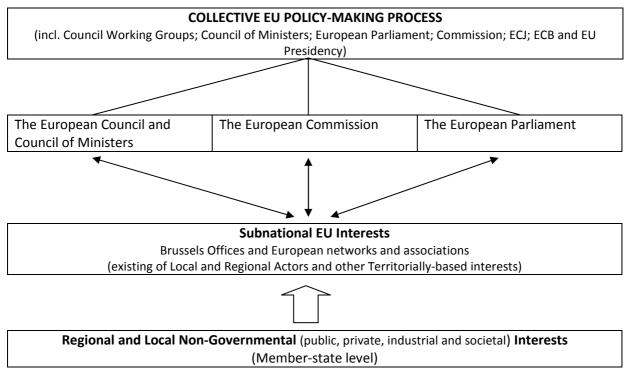


Figure 2: Channels of Representation for sub-national interests (adapted version for this thesis, see Tatham 2008: 498).

The hypothesis is as follows: Subnational interests lobby towards the three major EU institutions to pursue their interests and to influence policy-making. Since actual influence is difficult to measure, the level of access is seen as potential influence. Access is in turn dependent on the access goods supplied and demanded. The access goods supplied are the same as in LOA but the supplier is subnational interests. Due to the existence of the cohesion fund³ it is believed that most access will be found in the information exchange between subnational interests and the Commission. This is due to the expert knowledge in these policy areas that subnational interests engage in. When lobbying the other two institutions it is believed that the subnational interests receive best access when exchanging information with the Council or its own national government with IDEI⁴. To gain access to the European Parliament, subnational interests must often work in associations to supply the information demanded, IEEI.

The thesis take on the duty of further exploring the theory of LOA and exploring the possible access to different channels of representation.

³ The cohesion fund was introduced to reduce inequality between regions and to compensate governments for the cost of economic integration, adjusting weaker economies to EU standards. It was introduced after the first enlargement and has increased in importance over time. It is one of the most important areas for public expenditure (Bomberg et al. 2008: 129).

⁴ Information of Domestic Encompassing interest is here understood as domestic information of the region or municipality represented.

3 Method and Material

3.1 Method

The aim of this thesis is to both explain the influence of subnational interests have when lobbying towards the EU institutions and to put the explanatory power of the theory of LOA to a test. By doing so, this thesis take on the duty of being both theory-consuming and theory-testing. The main theoretical framework will be used to describe organized interests access to the EU institutions. In this sense I consume a previously tested theory. The thesis is theory-testing in the way that I am applying the theory to the phenomenon of lobbying but on a different case since the new actor analyzed appears in other policy areas and is not only business oriented. This is therefore a theory testing case study with most different system design (Esaiasson et al. 2005: 114). This is made to enhance the explanational power of LOA. By applying an existing theory on another case study it might be able to validate and give strengths, or in other circumstances, denounce the theory (Esaiasson et al. 2005: 115).

A way to enhance the result of a theory-testing case study is to develop the theory since this can overcome the problems connected with few cases (Esaiasson et al. 2005: 117). This thesis aim is to explore the theory and adapt it to the case of subnational interest groups. Thereby no attempts will be made to develop the theory used.

The theory-testing case is built upon a qualitative study since I seek description and apprehension of a certain structural phenomenon (Lundquist 1993: 104).

Bouwen developed his theory by conducting a series of interviews with business groups and EU-officials. In this thesis the theory will be tested by evaluating the answers from interviews and respondents of a questionnaire. The method of investigation between interviews and questionnaire has its differences but shares a common base. Generalizations will be made by evaluating the respondents from a fixed population. These respondents will here be representative for the entire population so generalizations can be made (Esaiasson et al. 2005: 256). There exists a notion that by using a questionnaire the study often tends to be quantitative, since the number of respondents can easily exceed that of interviewees. Although a higher number of respondents enhance the generalization made, in this thesis it is the responds that are important. Since the thesis covers a very somewhat closed field of events, the method which I chose to

operate in is limited text-analysis based on previous written material, and a form of in-depth interviews.

During the interviews a tape-recorder was used. This allowed the interviewer to go back and listen to the answers for clarification. The interviews lasted around 30 minutes to 50 minutes depending on the interview situation (the telephone interviews were shorter). Another problem is the effect the interviewer might have on the interviewee. This can in fact lead to the interviewee correcting their answers to what they think the interviewer wants them to answer (Dalen 2007: 13) This is of course not something that the interviewee can affect. Neither is it possible, from the author's perspective, to get objective interviews that reflect the truth. The answers may perhaps not be true or might be exaggerated. It can only be acknowledged that there is a risk, but I have also deliberately tried to speak as little as possible during my interviews, without typical questions, but more discussion topics such as asking the interviewee to explain, describe and talk about perceptions (Dalen 2007: 16), probing questions as guided conversation (Marsh & Stoker 2002: 198). The questions concerning the questionnaire was more structured but consisted of several 'why' questions as well.

3.1.1 Operationalization of the Theory

The 'Logic of Access' was developed and originally tested on legislative lobbying within the European financial service sector through interviews with decision-makers. In this thesis the focus will be on the relationship between decision-makers and subnational interests. Furthermore, the validity of the hypotheses is tested from the lobbyist's point of view. Subnational interests are here characterized as regional and local Brussels offices. These offices are seen as the subnational interest's right hand in the EU that has a good insight in 'the rules of the game'. This is why they are selected as examples of subnational interests.

It might be a reasonable assumption made on the basis that a lobbyist is unable to correctly estimate the amount of access given in comparison to other lobbyists (Bouwen 2003: 19). On the other hand, lobbyists probably do know to which institution they are granted most access, which institution that come second and so on. This leads to the assumption that when comparing the ranking of access to the institutions it is not unreasonable to start out from the point of view of subnational actors. To better fit the case of this study, the original hypotheses of LOA will be rewritten from the point of view of business interests to that of subnational interests. The three statements of the hypothesis will thus be categorized into smaller subnational actors from centralized states and bigger subnational actors from semi-federal states. It is worth noting that the categories of business interest are here excluded. It should also be noted that while Bouwen's (2002; 2004) original results speak of actual access the wording of this hypothesis is here changed from 'have access' to 'experience access' in order to reflect the different perspective and the methodology of this study.

The original theory was developed for studying legislative lobbying, as opposed to fund lobbying. My selected case within subnational representation in the EU can be expected to find traces of both kinds of lobbying. It should be stated that some of the subnational actors would not describe their work as lobbying, only information exchange. It is expected that much of the work, lobbying or information exchange, is aimed to gain influence on legislation and regulations. Many of the issues discussed at the sub-systemic level are often detailed. Examples can be the cohesion fund, transport, communication, the environment and research & development.

Different opportunities to share information and gain access will also be merged with LOA, since organizational structure is of various constellations. To engage in policy networks and collective action through organizations and associations which will provide better access to the Council and Parliament since it deals with constructing demanded information of both expertise and more general policy information with many stakeholders. Networks and organizations are of major importance to be updated on EU policy-making and is part of everyday work for subnational actors.

LOA operates in a multi-level governance EU where not only private business interests have access to the EU but also regional and local authorities compete for access. Thereby relations are established between EU-institutions and subnational actors but access goods must still be supplied to gain access. It is accepted though that policy is shaped at different levels and that actors can experience access to the institutions despite being in contact with different level of officials.

3.2 Material

There is a considerable amount of research written about lobbyism within the European Union. Most of this literature is descriptive. The various interests and EU-institutions involved create an array of lobbying possibilities and lobbying behavior, and it is difficult to make any generalizations about lobbying strategies. Because of this, the literature on subnational interests lobbying strategies is less extensive. To get an in-depth view of my research-topic, I have conducted interviews with representatives from subnational interests. I have also constructed a questionnaire with questions of main importance to fit the testing of the theory. The interviews and questionnaires are my primary sources.

The interviewees and respondents to the questionnaire are all representatives from regional Brussels Offices. Regional Brussels Offices may represent subnational interests of various constellations. The interviewees were chosen since they represent subnational interests from different member-states and are of different size and have different resources at hand. They are thus a good mix of subnational interests at the EU-level, which add a better picture. I conducted three interviews of which the majority was telephone interviews. The interviewees were:

- Madeleine Koskull, Director Sydsam (South Sweden).
- Ted Bergman, Administrator Central Sweden (telephone interview).
- Maruxa Cardema Southwest UK Brussels Office (telephone interview)

Respondents to the questionnaire are two Brussels Offices representing a region and a municipality from Spain:

- Marta Arànega i Gallart Municipality of Barcelona in Brussels.
- Maria Godoy Andalucía Brussels Office.

More interviews should preferably have been done to get an even broader material so that better generalization could be made. Since the topic chosen often involves a somewhat closed set of events, no specific first-hand documents have been able to be used here. I will therefore also rely on previous research in this field.

The secondary sources are books and articles on subnational interests and subnational mobilization at the EU-level. A lot of the literature involves the 'Europe of the Regions', a concept developed to describe the increasing regional participation in EU-policy making in the beginnings of the 1980s. This concept is related to the cohesion fund and structural fund, were the EU used subnational officials to help design and implement economic development plans alongside national and Commission officials. These new channels for subnational mobilization are the base of the theory of multi-level governance (Hooghe & Marks 1996: 73). The secondary sources will be used to analyze and better describe subnational interests' access to the institutions of the EU. Previous research within the field will be looked upon and compared in the analysis (Moore 2008; Tatham 2008; Hooghe & Marks 1996; Mark et al. 2002).

4 Empirical Findings

In this chapter the result of the questionnaires and interviews will be accounted for. The experienced access and the information provided to the Commission, the Parliament and the Council is here presented from the point of view of the subnational interests' Brussels Offices. The material has been utilized in accordance to the method described in the previous chapter.

4.1 Information

Information supplied by subnational interests depend very much on which policy issues that their home-base wants to pursue in the EU. Regional offices may therefore work within different policy areas. Despite of this there exist certain policy areas that are interesting for most subnational interests and were they are keen to offer information. The relationship between subnational interests and the Commission has often been about the issue of the structural and cohesion funds. This is not necessarily the case anymore. Although the structural and cohesion funds remain important for several local and regional authorities within the EU member states, other policy issues such as transport, communication and the environment has grown equally important when lobbying the EU, at least accordingly to the offices of this study (person 1-3).

Many of the Offices also stresses that the Commission often is interested in detailed information and hence interested in subnational interests that may provide this. Many of the bigger regional offices in Brussels are structured in a way that allows for deeper analysis of single issues. There might for instance be personnel who specialize in one question, which allows for more time-spending and information gathering concerning a specific issue (person 1 and 2). Another office points out that the Commission is interested in their information specifically since this is more detailed about the interests of the region they represent. In comparison to the CoR were collective information is provided (respondent 2). Information is often provided with the Commission's working groups or at conferences and seminars arranged by the Commission.

Networks are in this sense valued as an important factor when expert knowledge is demanded. Networks are issue-specific and are a necessity to supply the right information. Following quotation implies the importance of policy networks:

Our Brussels office participates in several policy networks. These are related to our core questions such as communication and research & development. This has nothing to do with the

fact that we are a small office, all Brussels offices participate in some policy network. For example, our network concerning research and development has members that are representing two German Länder Brussels Offices – and they have a lot of more resources than we do.

(Person 2, 2009-05-09) [Authors translation].

The very detailed information that a policy network might offer makes Brussels offices from both bigger and smaller resources participate.

Subnational interests may sometimes inform MEPs on issues that might be in the spotlight at a certain time. The Parliament is considered to ask for more general information than the Commission. Information is in that case provided to the committees of the Parliament that work within the same policy areas (person 2). The MEPs from the committees need information that is basic factual and which can be made political. It is seldom that single MEPs with the same regional affiliation would ask the smaller offices for information. These MEPs can be in contact with politicians at home. MEPs with affiliation to regions with bigger offices in Brussels are more likely to exchange information with these (person 3).

According to the findings, little or no information is shared with the Council. This is mainly because such information can be provided by representatives and politicians of regional and local level at home base. At the EU-level, common interests are not shared (person 1). None of the regional offices in our study have ever written any information directly to the Council, and hence cannot state what kind of information that is demanded. It is acknowledged though that they perceive that subnational interests of other member-states of federal system may provide information to the Council by their national representatives in the Coreper (person 1-3, respondent 1-2).

I would say that we have no information to offer the Council. If we want talk about a certain policy with the Swedish government, representatives at home would do it. I am certain that this would not involve an issue concerning policy at the EU-level, or such information.

(Person 2, 2009-05-09) [Authors translation].

4.2 Access

The empirical findings on subnational interest's access to the institutions of the EU show a similar pattern across the regional offices in Brussels. The main access point is the European Commission and this is the case for all regional offices in this study. One representative of a regional office puts it like this:

"I don't know if there is any stated direction from the Commission on how much contact they must have with interest groups, maybe once or twice a week for example. I do however find that the Commission is very open to interest groups of various kinds and interested in their point of view"

(Person 1, 2009-05-07) [Authors translation].

All regional offices have frequent contact with people working within the Commission at different levels and the institution is seen as the main target for lobbying efforts. Contacts are made through personal meetings or correspondence and mostly with administrators within DG Regio. Direct contacts are often made with administrators of the same nationality or regional identity as the subnational interest. Also, the Commission often invites different subnational interests to different meetings of interests.

The heavy lobbying activity towards the Commission is explained by the monopoly of initiative in the EU-policy process. All representatives for subnational interests in this study do claim that the supranational role of the Commission is an important reason to collect and provide information to this institution.

Access to the Parliament is not evenly distributed among subnational interests. The findings indicate that some subnational interests receive a good amount of access to the Parliament since this is requested. Other subnational interests have a minor interest in this. Access to members of the European Parliament (MEP) is made through personal contacts or correspondence. The level of these contacts is however low and as most a few times a month. When contact between subnational interests and parliamentarians exist, this is often related to issue or policy specific reasons. In this case, contacts are not made specifically to parliamentarians of same nationality or perhaps the same regional affiliation as the subnational interest. Contact is instead made with parliamentarians who are believed to be able to influence the policy formation or at least is interested in the offices point of view. The same Brussels office representative continues:

I would say that after the Commission we have most contact with the Parliament and no contacts whatsoever with the Council. Actually, we do not have that much contact with the Parliament even though we perhaps should. The Parliament is more interested in issues that are easy to create political opinion about, such as green movements and human rights of NGO. We Brussels offices are not that interesting, even though we have good contacts.

(Person 1, 2009-05-07) [Authors translation].

The Parliament has the power to approve laws and regulations concerning some policies (see Kohler-Koch 1997). Parliamentarians do not yet possess the strength to influence superior policies at the heart of the Commissions work. Some offices do however stress the growing importance of the Parliament and hence the increasing importance of lobbying there.

There exist more ambiguous findings when it comes to the perceived access to the Council of Ministers. There is an apprehension of both non-access to the Council and some access to the Council. Some offices describe that there exist no common interest between the Council and the subnational and that this is mutually experienced. Hence, no attempt to gain access to the Council is made. If a subnational interest wants to receive access to the Council, the quickest route would be to establish contact with representatives from their national government. Most offices in this study experience little or no access to the Council. Some mention to be or to have been in contact with their constant representatives at the

EU, Coreper (person 1). Others mention that their region participate in the working groups of the Council (respondent 2). Despite of this there exist common understandings that if the subnational interest wants to access the Council, it must establish contact and pursue this goal at home base. Then indirectly, the subnational interest might gain access to the Council through this channel.

5 Discussion

In this chapter the results of the empirical findings will be discussed with reference to the theory of LOA. A comparison will be made to the operationalized hypotheses about information supplied and access. Similarities and differences will be commented upon. Attempts to explain deviant results will be made.

5.1 Relations to the Commission

According to the original hypothesis the supplier of EK were expected to experience the largest degree of access to the Commission and a lower degree to both the European Parliament and the Council of Ministers.

Subnational interests experience a high degree of access to the Commission and less access to the other two institutions. This indicates that subnational actors are supplier of expert knowledge, something that all case offices have pointed out. All case offices claims to provide information that would constitute expert knowledge since they are able to gain specific information about their home region. This nevertheless does not mean that office size does not matter. It is perceived that subnational interests of bigger resources and stronger political influence in their home-state gain more access to the Commission than those of smaller capacity (person 1). Other research supports this perception (Moore 2008; Kohler-Koch 1997). It should also be noted that the high concentration of lobbying towards the Commission is a result of the EU legislative process. The Commission has the monopoly on of initiative in most policy field. But it is also stated that the Commission should consult widely before proposing legislation. The strong bias towards the Commission is a mix of agenda-setting powers and an 'open door policy' (Karr 2006: 155).

5.1.1 Subnational Actors beyond the Regional Policy

The relationship between the Commission and subnational interests was in the beginning built up around the regional policy⁵. One of the principles guiding the regional policy is partnership, an idea that regional and local actors should work

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⁵ The EU Regional Policy is split into two main categories: the cohesion fund and the structural funds. The cohesion fund is, as stated earlier, about economic adjustment and the structural funds concern social and regional developments, and agriculture and fisheries (Warleigh 2003: 103).

jointly with the Commission and member-state governments to devise and implement the policy (Warleigh 2003: 103). In this sense, subnational actors have had privileged access to the Commission since the partnership principle was determined. This opens the question of the amount of access subnational actors have when seeking to shape European policy beyond the regional policy.

The Commission is experienced as open to interest groups. Depending on the issue at stake, the Commission often seeks up interests that can offer relevant point of views. This openness on behalf of the Commission has encouraged the interpretation that this strategy weakens member-states and empowers subnational actors. Greenwood goes further and claims:

'The Commission has not been an impartial actor in this process [European integration], deliberatively cultivating bridges directly between the territorial and supranational levels where it is able to'.

(Greenwood 2007: 174).

Although this might be contested since member-states are the main actor in the EU, it is true that the Commission have created multi-level governance and power-sharing within certain policies important for subnational interests. This would suggest that the Commission is likely to be responsive to demands beyond the regional policy (Tatham 2008: 502). There exist indications that member-state government will tolerate subnational actors to liaise with the Commission on policies of importance for the subnational but irrelevant for the member state as a whole. However, also timing plays a part here. Member-states will be less tolerant the closer to formal negotiation than during the earlier stages of the policy process. For the Commission, subnational interests supply valuable data and expertise, but they are also 'vote-less' stakeholders in comparison to member-state government (ibid). It must be pointed out that access is differentiated between subnational actors were institutionally strong ones will have an advantage (Tatham 2008: 503).

5.1.2 Engagement in networks and collective action

To engage in networks or collective action is an important lobbying strategy at the European levels. The empirical findings stated that Brussels offices engage in different networks and associations at the EU-level to enrich their work (respondent 1) and because it is seen as an important forum to defend their interests (respondent 2). There exist some core organizations at the EU-level where many subnational actors gather. Much of these networks is issue specific and emerges to strengthen access to the institution of the EU in general and the Commission in particular when policy implementation is discussed. Some are however more fragile than others when it comes to lowest-common-denominator problems, often related to networks with wider constituencies (Greenwood 2007: 170).

For most subnational interests the CoR provides an instant network. Some Brussels offices have representatives here from the region or municipality they represent. Since the CoR itself was established by the Commission, its contact to the institution is valuable for several subnational actors, including for the offices interviewed. The CoR is however described as relatively weak (Greenwood 2007: 169). Another common network is between Brussels offices with constituencies of the same member-state. For example, The Swedish Brussels offices in this study interact in a Swedish network every week where they exchange information and experiences (person 1 & 2). Most Brussels offices, no matter size or member-state belonging, participate in several different networks. There also exist networks consisting of Brussels Offices of both bigger and smaller resources. Brussels offices often specialize in different issues and therefore competences may be used from other offices to gain a collective advantage and in the long-run, better opportunities to access the Commission (or some of the other institutions as well). If subnational actors do not have, for example, legislative competence when drafting a statement it is valuable to have subnational networks (Kettunen & Kull 2009: 130). The participation in different organizations of collective action is also high. These organizations such as CEMR (Council of European Municipalities and Regions) and AER (Assembly of European Regions) will provide information of a broader constituency, which often attracts both the Commission and the EP (Jerneck & Gidlund 2001: 127).

5.2 Relations to the Parliament

According to the hypotheses of LOA the supplier of IEEI would experience the largest degree of access to the European Parliament and a lower degree of access to both the Commission and the Council of Ministers.

The empirical findings stated that subnational interests experience somewhat access to the Parliament. This relationship is often for the subnational actor to create. Some offices stated that contact with the Parliament is often made with MEPs from the same member-state of which they represent while other offices stated that contacts with MEPs depend on the issue and policy that is pursued (person 2 & 3).

The European Parliament is otherwise described to be similarly open towards interest groups as the Commission. The results of the interviews and questionnaire gave only a somewhat experienced access. This would indicate that the Brussels offices only supply a moderate level of IEEI. The Parliament is most interested in information by interest groups with a large base that gives a public perspective (Karr 2006: 157).

5.2.1 The Growing Competences of the European Parliament

The Parliament has often been overlooked as a channel of subnational interest representation in the EU. The Parliament can be effective to promote subnational interests within the EU. The growing competences of the Parliament lies with the co-decisional powers that the institution shares with the Commission (Warleigh & Fairbrass 2002: 83) and the Constitutional Treaty would have further extended the powers of the Parliament to other policy fields (Tatham 2008: 505). It is understood that in the future the Parliament will play a stronger role in the EU policy-making process and already today in Brussels politics, the EP know how to use its credentials beyond the formal power granted (Tatham 2008: 506). MEPs possess a lot of soft power and can provide significant added-value to the case they present when they lobby the Commission (Bomberg et al. 2008: 103). The Parliament might soon enough become a more important lobbying channel for subnational interests.

5.3 Relations to the Council

According to the original hypothesis the supplier of IDEI would experience the largest degree of access to the Council of Ministers. They were also expected to experience second best access to the Parliament and the lowest degree of access to the Commission.

During the empirical testing of our cases it was confirmed that subnational interests experience little or no degree of access to the Council in comparison to the other two institutions (person 1-3, respondent 1-3). This would be a sign of no domestic encompassing information is supplied by subnational interests to the European level. IDEI could be supplied by subnational levels within the member-state but would then not lobby the EU-level. Here it is hard to determine if this information would constitute EK or IDEI. Subnational interests could in theory lobby their national government and use it as a route to the Council rather than lobby directly towards it. The constitutional system of the member-state determines if it could be an opportunity or a dead-end.

5.3.1 The Issue of the Constitutional system

The result of the empirical findings was that no access to the Council was experienced. Other researches indicate that this result is not entirely true. Institutionally strong subnational actors that are much entrenched in their respective state, such as the German and Austrian *Länder* and Belgian regions can exert more influence on the Council (Hooghe & Marks 1996: 77). According to

the Maastricht Treaty⁶ it is granted for member-states to include subnational representatives in their delegations. These regions are highly influential in the domestic politics in their home-state and have had access to Council meetings. This possibility is now demanded by both the UK devolved administrations and the Spanish autonomous regions (Tatham 2008: 499).

There has been much debate to whether such a possibility really enables subnational actors to push for their case. Some argue that this inclusion does not change much of the status quo before subnational actors were not allowed. This argument builds on the fact that the subnational is not allowed to represent themselves at these meetings, they are in such a situation representing the member-state (ibid). The counter argument is that the mere presence of a subnational actor indicates that there is an issue on the agenda that has severe impact for its constituency. Such a presence will influence the member-state minister who will be more inclined to pursue the interests of the subnational actor, and not only the member-state in general (Tatham 2008: 500). The ability to gain access to the Council is hence twofold depending on which subnational authority the Brussels office represent.

5.4 Research question revisited

The research questions of this thesis concerns the experienced access that subnational actors perceives to the different institutions of the EU, and how compatible this is with the original hypothesis constructed by Bouwen (2002) concerning business interests. The offered answers are multifaceted rather than explicit because of the complexity to gain access.

The result of the empirical study made with Brussels offices from Sweden, Spain and the United Kingdom is as follows (see figure 3):

Figure 3 – Access Good Supplied and Level of Experienced Access for Brussels offices. Number 1 is most supplied access good or level of experienced access. Number 3 is the lowest

| 11 | <i>y</i> 1 | |
|----------------------------|------------|--------------------------------|
| Access Good Supplied: | | Level of experienced Access to |
| | | the Institutions of the EU: |
| 1. Expert Knowledge | - | 1. The Commission |
| 2. Information of European | - | 2. The Parliament |
| Encompassing Interests | | |
| 3. Information of Domestic | — | 3. The Council |
| Encompassing Interests | | |

This fits with the hypothesis according to Bouwen. The arrows in figure 3 do not cross each other. The expected information supplied relates to the level of experienced access. Since the offices firstmost supply information of Expert

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⁶ Article 146 and 203 of the Maastricht Treaty legislate this representation (Tatham 2008: 499).

Knowledge they experience a greater access to the Commission. The offices experience thereafter some amount of access to the Parliament. The offices claims that the Parliament demand more general information. The offices experience no or little access to the Council since the information supplied is handled by regional and local authorities at member-state level, not at the EU-level (person 1-3, respondent 1-2). The Logic of Access provides here reasonable explanation of the amount of access. Since the Brussels offices know which information that is demanded, they know which information to supply to which institution in order to receive access.

A weakness when applying LOA is that the lack of division of organizational structure. Brussels offices are as diverse as the regions or localities they represent. The result could hence be different than the findings posed above. Differences between Brussels offices depend on *regional and local power*, the tier between member-states and the subnational level, and *office resources* that depends on office staff, size and budget (Marks et al. 2002: 10; Berg & Lindahl 2007: 63). Previous research indicates (see Moore 2008) that subnational actors representing regions with stronger constitutional links such as the German Länder, the experienced access might differ. It is expected that these subnational actors would find a higher level of access at the Council compared to the Parliament. It is still expected, however, that the highest level of access would be received at the Commission (Moore 2008: 526).

The division between resources and regional power is not sufficient enough to fully utilize the theory of LOA since the Brussels offices can participate in various constellations of organizations and networks, which will change the outcome on the access good supplied by the subnational actor. Depending on both the policy pursued and the timing of supplying the access good in the policy-making process, there exist several options for which information that should be supplied. This is not to say that resources do not matter. The Brussels office with bigger resources may be able to gain access and pursue influence on its own. In that case the subnational actor does not have to worry about free riders or lowest-commondenominator problems (Berg & Lindahl 2007: 68).

When we compare subnational interests groups form of access to the private business interests access as concluded by Bouwen (2002) we find difference when it concerns information of Domestic encompassing interest. The supplier of IDEI in Bouwens example gain access to the Council. None of the Brussels offices of the thesis study said that they were supplier of this type of information. It was acknowledged that neither did they pursue to gain access to the Council. The offices also showed a lukewarm interest for the Parliament but understood that they demanded information of IEEI. It is difficult to say anything about the 'perceived access' of subnational interests and the 'have access' of the private interests. Although the subnational actors claimed to perceive good access to the Commission, to say that they 'have access' in the same amount as the private interests seems tricky. Bouwens organizational grouping into four categories allowed him to get a deeper understanding of private business interest lobbying behavior. In this study only one organizational category, in some part two organizational categories if you divide between bigger and smaller resources, was

analyzed. Therefore is the expected level of access constructed by LOA greatly generalized. The result that Brussels offices supply mostly Expert knowledge might not be too surprising considering that the offices are put in Brussels to be the subnational levels expert.

Still, the Logic of Access has been proven sufficient to get an apprehension of Brussels offices expected access to the institutions of the EU.

This study has gained an insight of the multi-level governance in the EU. The ability to participate in 'multi-level governance' is thus also varied. It will depend on efficiency of an office to exploiting key opportunities and in policy-making activities and the ability of the office voice to deliver valuable contributions to such processes. It has also been shown that policy networks and collective action is providing information that helps smaller offices gain access when they otherwise would not.

At least, two statements must be made. First, the subnational Brussels offices are not the only subnational actor at the EU-level. The offices are only a part of a much broader pattern of 'subnational mobilization' which consists of en everthickening network of transnational, subnational and non-hierarchical relations in the EU. In this way, regions, municipalities and cities do not have to use the Brussels offices as route to the institutions of the EU. The smaller offices already suffer from lack of resources and doubtful expectations at home, which might make a region or municipality to choose another path to the EU. Second, Subnational Brussels offices does not have formal competencies in the EU, so to the extent that they may exercise influence, it will be soft (Moore 2008: 531).

6 Conclusion

There are numerous interest groups that lobby the European Union and there exist several channels to influence EU policy-making. To be able to pursue interests and gain influence it is important to receive access to the institutions of the EU. This thesis have offered a closer look on the access opportunities that subnational interests experience to the three major institutions of the European Union. I have throughout the thesis tried to touch upon some of the most important issues that come with the lobbying process. There are of course many other aspects that could have been analyzed, such as the question of transparency and democratic legitimacy concerning lobbying or the empowerment of the regions, etc. I have however chosen to use the theory 'Logic of Access' since it tries to illustrate the lobbying game, and hence put it to a test. I have tried to analyze the lobbying process from the viewpoint of subnational interests.

In the EU, it would seem that the Commission is more likely to be influenced by subnational interests within several policy fields, compared to the other institutions. The Commission refers to expert knowledge for its policy proposals but is also subject to a lot of lobbying by other interests than that of subnational actors and must take several stakeholder views into account. The Parliament is despite the growing attention from certain interests groups still a bit neglected. In the future however, it might become immensely popular if more competences are delivered by the Lisbon Treaty. For the Council, member-state interests are a given priority over subnational interests and changes here are distant. We do not know the influence subnational interests have but we have an observation of perceived influence. LOA provides a satisfactory explanation but organizational structure does seem to be a weakness when applying the theory on subnational interests.

This thesis does not imply that this is the entire truth behind subnational actors lobbying behavior. It does however outline a part of it, by describing possible access strategies and a small insight of what is needed for successful lobbying.

Further and more extensive research is needed to test the Logic of Access to establish the relationship between organizational structure of subnational actors and information supplied with a more secure result. Both the demand side and the supply side should be further investigated. It would be interesting to test the theoretical framework on a wider range of subnational actors. It would also be interesting to test if the views of the decision-makers of the institutions coincide with that of the lobbyists. It is clear that the theory needs to be further developed.

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Delegacion of Andalucía Brussels Office web-page:

http://www.junta-andalucia.org

INTERVIEWS AND RESPONDENTS TO QUESTIONNAIRE

(Person 1) Madeleine Koskull, SydSam Brussels Office. 2009-05-07 Malmö, Sweden.

(Person 2) Ted Bergman, Central Sweden Brussels Office. 2009-05-11 (telephone interview).

(Person 3) Maruxa Cardema, Southwest UK Brussels Office. 2009-05-18 (telephone interview).

(Respondent 1) Marta Arànega i Gallart, Diputacío de Barcelona (Municipality of Barcelona, Spain). 2009-05-04.

(Respondent 2) Maria Godoy, Delegacion de la Junta de Andalucía en Bruselas (Andalucía Brussels Office, Spain). 2009-05-06.

Appendix

Questionnaire (and part of interview questions)

| Organizational structure: | |
|--|-------|
| What level does your organization represent? | |
| □ Local representation | |
| □ Regional representation | |
| ☐ Association of representations | |
| □ National representation □ Public interest | |
| 1 tione interest | |
| • Which is your main policy area (or policies areas)? | |
| Office contacts with EU-institutions: | |
| Which EU-institution does your office have contact with (the Council, the Commission or the Parliament) when pursuing your interests and why? | |
| • Rank the EU-institutions after degree of contact. Number 1 is most contact, num is least contact. | ber 3 |
| 1. | |
| 2. 3. | |
| 3. | |
| Does your contact with a specific EU-institution depend on the policy of which yorganization is working with? | our/ |
| • How is the frequency of your contacts with the EU-institutions? | |
| □Every day | |
| □Every week | |
| □Every month | |
| Office information supplied: | |
| • Does the organization represent mainly (1) European interests, (2) domestic/nation interests or (3) local interests? Rank from 1 to 3, were 1 is the interest you represent the second of the contract of th | |
| the most. | |
| 1. | |
| 2. | |
| 3. | |

| • | What kind of information or knowledge can your organization offer? □ Expert knowledge of specific issues (this involves expertise and technical knowhow) |
|---------------|--|
| | □ Information about European encompassing interests (this involves needs and interests when dealing with the internal market, providing more general information) □ Information about Domestic encompassing interests (this involves needs and interests of domestic issues, providing more general information) |
| | If your organization offers several kinds of information, please rank them with number 1 being most offered information. 1. 2. 3. |
| • | Does your organization ever pursue your interests (by providing information) towards other EU-institutions? Which institution and which category of information? |
| • | Why is this? |
| • | Is the frequency of contact to a certain EU-institution depending on the information your office can supply? |
| • | Have your office ever encountered any problem to provide information to a certain EU-institution? |
| <u>Office</u> | information demanded: |
| • | Is your organization ever approached by an EU-institution? ☐ Yes ☐ No |
| | If approached, rank the EU-institutions in frequency of contact (Choose among the Parliament, the Commission and the Council). 1. 2. 3. |
| • | Is your organization ever approached by other EU institution? Which? |
| • | If ever approached by an institution, when or in which circumstances are you approached? Please specify why for each EU-institution (the Commission, the Council or the Parliament). |
| | |

Office networks and cooperation:

- Does your organization cooperate together with other organizations (for example in other associations or networks)? Why?
- Does your organization offer other kinds of information (as those stated above) when working together with other organizations or in associations?

Does this change the frequency of contacts between the different EU institutions?