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GIANTS AND DWARFS: THE MULTILEVEL LOBBYING STRATEGIES OF NATIONAL INTEREST ORGANISATIONS[1]

Abstract. *The article addresses the bias in interest representation within the EU by examining the lobbying strategies of national interest organisations within the EU's multilevel political system. Both our theoretical framework, which includes the determinants of a national interest organisation's decision to act at the EU level, and the data analysis from the INTEREURO Multi-Level Governance Module (MLG) (www.intereuro.eu) reveal three main findings. Firstly, the greatest differentiation among interest organisations (IOs) appears to be between those IOs from the older member states (Germany, the UK and the Netherlands), which exhibit above-average levels of activity, and those from the newer EU member states (Sweden, Slovenia), which exhibit below-average levels of activity. Secondly, the variations in IO activity levels are much greater from country to country than from one policy field to another. Thirdly, although the IOs from all five countries in our study are more likely to employ media and publishing strategies (information politics) than to mobilise their members and supporters (protest politics), we can still observe national patterns in their selection of strategies and in the intensity of their instrumentalisation.*
Key words: *EU, interest groups, interest organisations, lobbying, strategies*

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Introduction

The representation of interests in the EU political system is highly complex – both in terms of the resources that interest organisations[2] (IOs) can bring to bear on EU-level policy processes as well as in the interplay between the bottom-up, top-down and horizontal inputs that interest organisations effect in EU policymaking. Within this framework, analysts evaluating policymaking at the EU level have often observed that there are certain biases in the participation of IOs. We are particularly interested in biases that potentially arise from the increasing variety of resources available to national interest organisations as well as the national contexts from which these organisations operate in an enlarged European Union. This aspect of interest representation in the EU remains largely unresearched (Beyers et al., 2008; Eising, 2008) despite the fact that the EU constantly faces a question of legitimacy (Eriksen, 2014), particularly with the public revelations that certain interests enjoy better access to policymakers[3] and the scandal of closed-door deals between policymakers and certain interest organisations – namely, big corporations.[4]

Interest representativeness has not only gained additional importance as part of the EU legitimacy in the context of the international financial crisis (Kröger, 2014; Fossum, 2016), but has also become problematised due to the recent wave of enlargement. A number of empirical studies from Western EU member states have revealed that the decision of a national interest group to Europeanise its lobbying strategy will depend on both its resources and its domestic national institutional context (Klüver, 2010; Beyers and Kerremans, 2012). We might expect to see an extensive gap in interest representation at the EU level due to the fact that the representation of interests from post-socialist EU member states tends to be weaker, since interest organisations (particularly NGOs) from these countries tend to have weaker resources (see the NGO Sustainability Index[5]).

[2] *For the argumentation in favour of using this term, see Beyers, Eising, Maloney (2008).*

[3] *See information published by the Corporate Europe Observatory (http://corporateeurope.org/), Transparency International – EU integrity watch (http://www.integritywatch.eu/), Worst EU Lobby Awards (www.facebook.com/worstlobby/ and https://www.youtube.com/watch?v=k0Tq4bTK1CQ).*

[4] *For example, an EU investment proposal will not prevent corporate challenges to health and environment (http://corporateeurope.org/international-trade/2016/04/eu-investment-proposal-won-t-prevent-corporate-attacks-health-and); Trade Secrets: opponents call on national governments to reject the text (at http://corporateeurope.org/pressreleases/2016/04/trade-secrets-opponents-call-national-governments-reject-text; corporateeurope.org/international-trade/2016/01/dangerous-regulatory-duet); Trade Secrets: who voted what (http://corporateeurope.org/power-lobbies/2016/04/trade-secrets-who-voted-what); a leak reveals the Commission gave inside information to the automobile lobby on new emissions tests (http://corporateeurope.org/power-lobbies/2016/03/leak-shows-commission-giving-inside-information-car-lobby-new-emissions-tests).*

[5] *The 2014 report is available at https://www.usaid.gov/sites/default/files/documents/1863/EuropeEurasia_FY2014_CSOSI_Report.pdf.*

The main contribution of our article is to shed light on lobbying by national interest organisations acting at the national and European levels in an enlarged European Union. We will also question how the broad variations in an enlarged EU may contribute to biases in interest representation at the EU level. As a piece of original comparative research that examines the differences in both western and eastern EU member states as well as the differences in various enlargement waves, our study is first of all a descriptive comparative view of basic national patterns of interest representation within the EU's multi-level political system.

Our study focuses on the involvement of IOs in the national and European level decision-making on EU directives. More precisely, these processes are investigated from the perspective of the bottom-up input of national interest organisations into EU-level policymaking. We pay particular attention to two sets of questions on strategies adopted by interest organisations: (1) which strategies they adopt in terms of their selection of which level of government to lobby, and their choice of institution to lobby (i.e. whether the national executive, national parliament and/or the executive EU institutions– the European Commission and European Council, as well as the European Parliament); and (2) which lobbying strategies they adopt (i.e. which methods and techniques) to achieve their objective.

Based on our review of the literature and analysis of the data from the INTEREURO Multi-Level Governance Module (MLG) (www.intereuro.eu; Beyers et al., 2014), we tested the following four determinants which we expected to shape the strategies of interest organisations: (1) the *type* of interest organisation (whether economic or non-economic); (2) the *policy field* (the empirical data on the 20 most salient legislative proposals from the period 2008 – 2010 covers three policy fields – (i) environment and energy, (ii) human rights and (iii) finances); (3) the *country variations* in interest organisations' input into EU policymaking (data was gathered for five countries: Germany, the Netherlands, Slovenia, Sweden and the UK); and (4) the *EU funding* of interest organisations and their membership of EU umbrella organisations.

In the following sections we will present a brief overview of the literature in the field before turning to our detailed research questions, the data we used, our methods of analysing it, and our main empirical findings.

The multilevel lobbying strategies of national interest organisations

With the intensive development of the EU political system as a regional, post-national political system, a new structure of multi-level governance (MLG) has also emerged (Marks, 1996). Interest organisations have gained

a more complex institutional opportunity structure (Princen and Keremans, 2008), where they are faced with a variety of venues for promoting their interests. Indeed, some interest organisations which can afford to be active at the various levels of the EU political system are able to choose the best venue to influence EU policymaking (Mazey and Richardson, 1993; Grant, 2000; Beyers et al., 2008; Eising, 2008). EU lobbying may not only involve lobbying EU-level institutions directly, but also via European umbrella organisations (Beyers, 2002; Greenwood, 2003).

Until now, Western scholars in particular have been interested in the factors influencing interest organisations' activities at the various institutional levels and their possible combinations of activities at the various levels (i.e. lobbying both at the national level as well as at the EU level). The search for such factors has identified the following at the macro and mezzo levels: institutional factors (Falkner, 2000; Eising, 2006; Beyers and Kerremans, 2012); the distribution of powers in terms of horizontal and vertical fragmentation (Klüver, 2010); the embeddedness of interest organisations in their domestic (national) milieu (Beyers, 2002; Klüver, 2010; Beyers and Kerremans, 2012); policy issues and/or policy sectors (Beyers, 2002; Wallace, 2005; Beyers and Kerremans, 2012); and the different modes of interest representation (Schmidt, 1999; Beyers, 2002; Klüver, 2010). At the micro level, the following variations in IO characteristics are taken into account: an IO's resources (including EU and national funding, and personnel); and the type of IO (whether an economic or non-economic IO) (Greenwood, 2003; Beyers and Kerremans, 2007; Eising, 2007; Klüver, 2010). In spite of the proliferation of research into the factors influencing interest organisations' activities, the various findings have remained fragmented and inconclusive.

There remains a lack of insight into the adaptation of national IOs from post-socialist EU member states to the multi-level political system. Nevertheless, some contributions so far have highlighted the EU's top-down impacts on interest group formation as well as the EU's top-down impacts on national interest group activity within the framework of the national political system (e.g. Cellarius and Staddon, 2002; Hicks, 2004; Forest, 2006; Gąsior-Niemiec, 2010; Kutter and Trappmann, 2010; Stanojević, 2012; Fink-Hafner et al., 2015). Other research has emphasised the ineffectiveness of taking the European route (i.e. lobbying the EU level directly) even in the case of economic interest organisations such as trade unions (Kusznir and Pleines, 2008; Landgraff and Pleines, 2015). Such research tends to focus on the weak capacity of interest groups from Central and East European EU member states to participate in EU governance (Obradovic and Pleines, 2007). Some authors also highlight other factors, such as Central and East European EU member states' satisfaction with EU policies and a subsequent lack of perceived need to act at the EU level (Pleines, 2010). Nevertheless,

the research highlights the crucial fact that limited resources (such as organisational resources) and a lack of negotiating capacity hinder the ability of national actors from both the older and newer EU member states to influence policy at the EU level (see Perez-Solorzano Borragan, 2003; Eising, 2004: 217).

Although the primarily focus of our research is not national IOs from post-socialist EU member states, our analysis nevertheless provides some new insights into this subject due to our comparison of IOs from one particular post-socialist country (Slovenia) with IOs from countries which have not experienced socialism. Furthermore, our research is unique in that it simultaneously includes national interest groups from both western and eastern EU member states as well as national interest groups from both old and new EU member states and small and large EU member states which enables us to test the variations in national interest organisations' engagement at both the national and EU level. Consequently, our study contributes to the project of identifying the specific conditions under which the activities of national interest groups at the national level in various member states spill over to the EU level.

Research design

Our comparative research is unique in that it studies both the national and EU-level activities of national interest organisations from five countries (three older and two newer member states, which also simultaneously represent one eastern and four western member states) within the framework of the EU directive-making. In order to identify the differences among the national interest organisations in their multilevel endeavours, we opted for an exploratory orientation. We searched for answers to the following three research questions:

Q1: How do interest organisations choose their strategies in terms of the input venues? Here, we differentiate between the national venue, where IOs lobby national institutions to convey their interests up to the EU level, and the European venue, where IOs lobby EU institutions directly.

Q2: How do interest organisations choose their strategies in terms of lobbying methods and techniques?

Q3: Which factors influence interest organisations' choices of strategies? We answer this question from the following hypothetical determinants that indicate interest representation biases in EU policymaking – based on the literature and as permitted by the available data:

- the *type* of interest organisation (whether economic or non-economic);
- the *policy field* (the empirical data covers three policy fields: environment and energy, human rights, and finances and economy);

- the *country variations* (data on interest organisations' input into EU policymaking was gathered for five countries: Germany, the Netherlands, Slovenia, Sweden and the UK);
- the *EU funding* of interest organisations;
- and their *membership of EU umbrella organisations*.

In order to answer these research questions we analysed the data collected within the framework of the INTEREURO Multi-Level Government Module and we focused our analysis on the involvement of national-level actors in EU policymaking processes. This includes interviews conducted with national officials and non-state stakeholders in Germany, the Netherlands, Sweden, the United Kingdom and Slovenia based on the 20 most salient legislative proposals during the period 2008 to 2010 (for more information on the data collection and sampling see Beyers et al., 2014). The current analysis, however, is based on the data gathered from interviews with national interest organisations.

The interest organisations interviewed are not representative of the full population of interest organisations in the countries selected; rather, they represent those interest organisations actually involved in EU policymaking on selected EU-level policy proposals. In other words, all of these IOs were involved in forming national positions on the selected EU-level policy proposals. While some of them have pursued an exclusively national lobbying strategy or a combined European and national lobbying strategy, none of them have pursued a strategy of lobbying European political institutions to the exclusion of national institutions.

The research design is composed of the following stages:

1. In the first stage, we construct six composite indexes to measure lobbying intensity at various venues and two indexes to measure the intensity with which two types of lobbying strategies were used.
2. In the second stage, we use linear regression analysis to reveal the factors determining lobbying intensity at the various venues (i.e. the levels of government).
3. In the third stage, we use bivariate analyses (comparison of means) to demonstrate variations between countries and policy fields regarding the 'venue strategies' and the types of lobbying strategies.

Our units of analysis are the interest organisations interviewed[6]. Using

[6] *We conducted 101 interviews with those interest organisations that were the most active on selected policy proposals in their particular country. In Germany 19 interviews were conducted, in Netherlands 14, in Sweden 11, in United Kingdom 17 and in Slovenia 40 (since 5 state institutions were excluded, 35 Slovenian IOs were ultimately included in our analysis). We acknowledge that we cannot use our research data from these interviews to draw generalisations about the whole population of interest organisations.*

this data, we developed two types of indexes to measure the intensity and the extent of *lobbying strategies*:

a. We formed six *'venue strategy' indexes* for the following venues: the national executive, the national parliament, the European Parliament, the European Commission, the European Council and permanent representations, and civil society. The indexes are based on data that records how frequently and to whom interest organisations provide information for the purpose of influencing the legislative outcome. To obtain this data, we collected answers to the following question(s): *'The following questions concern the different political institutions to which your organisation may have provided information with the purpose of influencing the legislative outcome of the directive proposal. I will show you a list of different political institutions and I would like to know how regularly you have provided these institutions with information. Was this never, rarely, sometimes, frequently or very frequently?'* Answers were recorded on a scale of 1 to 5, however, for the purposes of our analysis the scale was recoded to values from 0 (never) to 4 (very frequently). The index value for each venue was calculated as an average value of all institutions (targets of lobbying) included in the index.
b. Based on the results of the principal component analysis and the hierarchical cluster analysis, we also formed two indexes for *'methods and techniques strategy'* for the following two outsider lobbying strategies: (i) media and publishing – 'information politics' (Beyers, 2004); and (ii) the mobilisation of members and supporters – 'protest politics' (Beyers, 2004). Here we did not focus on insider lobbying strategies (access to policymakers) since this is covered in our first type of indexes (previous paragraph). (For a more detailed explanation, see the further presentation of indexes below).

To explore the differences between interest organisations regarding the use of these strategies and methods we applied comparison of means and a multivariate regression analysis with the following possible factors: the type of interest organisation; the EU funding of the interest organisation; their membership of an EU umbrella organisation; the policy field in which they operate; and their country of origin (see research question Q3).

The key findings

The Factors Determining the Intensity of Lobbying at the Various Venues

Based on the regression analysis[7] (Table 1), the key determinant of multi-level lobbying is the interest organisation's country of origin, i.e. whether an older or newer EU member state. Indeed, interest organisations from older EU member states (Germany, the Netherlands and the UK) are systematically more active in all venues we assessed than IOs from newer member states. The other factors we might have expected to have been systematically relevant, such as the finances which IOs receive from EU programmes and their membership of European umbrella organisations, proved not to be so. Rather, they were relevant only for certain particular venues. For instance, the characteristics of an IO (whether economic or non-economic IO) appear to be relevant only in relation to the IO's interaction with civil society and with the European Parliament (see Table 1).

Based on this analysis the following factors are important:

- The factor of old/new membership is the single factor that is significant for IO activity at all levels.
- The factor of old/new membership is the sole significant factor of activity at the EU level.
- The policy field is only significant when IO activity relates to national parliaments: for matters concerning rights, IOs' targeting of national parliaments is higher when comparing to those active within other two policy fields (finance and economy, environment and energy); while IO within the financial and economic policy field target national parliaments less than those within the other two fields (rights; environment and energy).
- Membership of an umbrella organisation is significant in the case of providing information to civil society (significant at $p<0.05$) and to the European Commission (significant at $p<0.10$). More precisely, in the case of civil society, members provide more information than non-members; in the case of the Commission, members provide less information than non-members.
- The type of interest organisation (namely, whether economic or non-economic) is significant when providing information to civil society (significant at $p<0.05$) and to the European Parliament (significant at $p<0.10$). More precisely, in both cases (civil society and the European Parliament) economic interest organisations provide less information than non-economic interest organizations.

[7] *We used linear regression analysis.*

By contrast, the financing of IOs from EU programmes appears to have no significant effect on activity at any level.

Table 1: THE RESULTS OF REGRESSION ANALYSIS – THE FACTORS OF LOBBYING INTENSITY AT THE VARIOUS VENUES (STANDARDISED REGRESSION COEFFICIENTS)

Lobbying indexes:	Provision of information to the...					
Factors:	...national executive	...national parliament	...European Parliament	...European Commission	...EU Council and/or perm. representations	...civil society
old EU member	***0.374	***0.482	***0.498	***0.493	***0.511	***0.438
Policy field						
– rights	0.056	**0.220	0.070	-0.118	0.018	-0.045
– finance, economy	-0.168	**-0.198	0.002	-0.093	0.015	-0.123
– environment, energy	ref	ref	ref	ref	ref	ref
financing from EU programmes	0.172	-0.089	-0.141	-0.023	0.043	0.081
member of an umbrella organisation	0.065	-0.054	0.013	*-0.188	0.041	**0.220
organisation type: economic	0.009	-0.039	*-0.193	0.071	-0.012	**-0.214
N =	93	93	93	93	93	93
Adjusted R^2 =	0.115	0.322	0.275	0.193	0.210	0.244
F =	3.001	8.280	6.805	4.660	5.084	5.960

*** p < 0.01 ** p < 0.05 * p < 0.10

Note: Shaded regression coefficients are statistically significant at the level p < 0.05

Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

Venue Strategies and the Differences between Countries

From the national point of view, only two main interest organisation strategies could be identified: a national strategy and a combined national and European strategy. The majority of interest organisations reported having contact with national institutions. Meanwhile a sizable portion of interest organisations also report having contact with EU institutions and civil society. However, we can observe a significant difference between the IOs from older and newer EU member states regarding the proportion of IOs

which lobby at both levels. All interest organisations from the United Kingdom reported lobbying at both levels, as well as 92.9% from the Netherlands and 89.5% from Germany. In stark contrast, only 45.5% of IOs from Sweden and 31.4% of IOs from Slovenia reported the same.

In general, the European Parliament appears to be the most lobbied institution at the EU level (Table 2). This comes as some surprise given that the literature suggests that it is the European Commission which dominates EU policymaking (Greenwood, 2003). On the other hand, the European Parliament is a more approachable institution than the Commission due to the fact that it has national contact persons – MEPs (Kohler Koch and Quittkat, 2016). Here we should note that the policy proposals included in our analysis were those which were adopted with the participation of the European Parliament. Interest organisations differ less when deciding whether to adopt a national or European lobbying strategy than they do when selecting *which institutions* to target. In particular, they differ in deciding whether to give information to (1) the national executive and/or the national parliament and/or to (2) the European Parliament, the European Commission, the Council and national representations in Brussels.

Table 2: 'VENUE STRATEGY' INDEXES – AVERAGE VALUES FOR COUNTRIES (AVERAGE VALUES ON A SCALE 0–4)

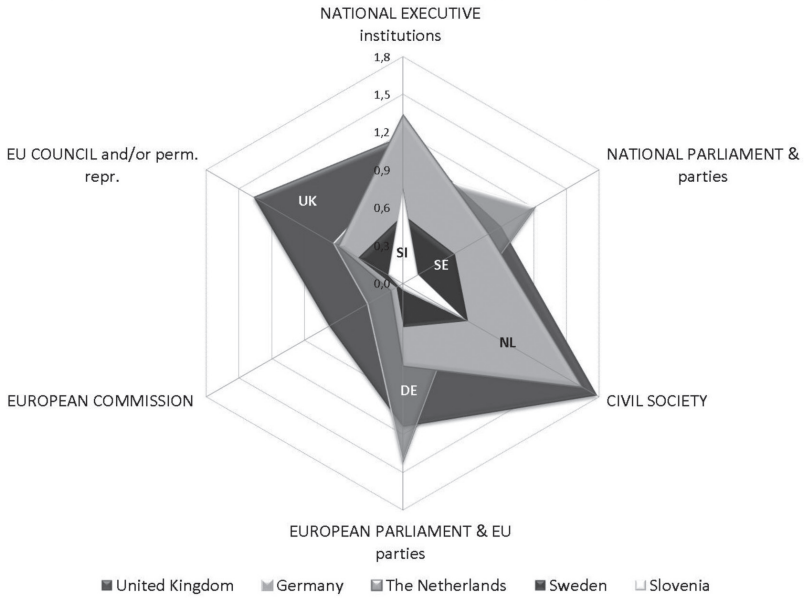
Provision of information to...	National executive institutions	National parliament & parties	European Parliament and EU parties	European Commission	EU Council and/or perm. repr.	Civil society
United Kingdom	1.167	0.902	1.136	0.673	1.368	1.779
Germany	0.912	1.211	1.413	0.322	0.632	0.500
The Netherlands	1.333	0.786	0.654	0.111	0.589	1.643
Sweden	0.546	0.470	0.343	0.061	0.409	0.591
Slovenia	0.767	0.143	0.046	0.038	0.136	0.579
Total	*0.924*	*0.620*	*0.632*	*0.220*	*0.550*	*0.932*
F	3.634	8.859	11.355	12.260	15.618	15.128
p	0.009	0.000	0.000	0.000	0.000	0.000
Eta^2	0.138	0.280	0.333	0.350	0.407	0.399

Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

As shown in Table 2 and Figure 1, IOs from the UK stand out with an overall outstanding provision of information to all national and EU-level institutions as well as to civil society. IOs from Germany are notable for their above-average lobbying of their national parliament and the European

Parliament. Meanwhile, IOs from the Netherlands are above average in their lobbying of civil society and in provision of information to the national executive. Slovenian IOs mostly tend to provide information to their national government and to civil society, but even these two strategies are underdeveloped compared to the IOs from the other countries studied. All in all, the differences in activity of IOs from the different countries can be characterised as *giants compared to dwarfs.*

Figure 1: 'VENUE STRATEGY' INDEXES – AVERAGE VALUES FOR COUNTRIES (AVERAGE VALUES ON A SCALE 0–4)



Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

Venue Strategies and the Differences between Policy Fields

As we have already seen, our regression analysis suggests that the differences between countries are greater than the differences between policy fields (Table 1). The results of our bivariate analysis (a comparison of means and one-way analysis of variance) for the differences between countries (Table 2) and the differences between policy fields (Table 3) further supports the conclusion of our regression analysis. This means that the variability among interest organisations within a country is lower than the variability within a policy field. Or, to put it another way, the variability among interest organisations from different countries active within the same policy field is

greater than the variability among interest organisation from the same country which are active in different policy fields. Indeed, interest organisations are more homogeneous within a country than within the same policy field. So, an interest organisation's country of origin – rather than its policy field – is a more significant determinant of its venue strategy. This is particularly true for lobbying at the EU level (compare Table 2 and Table 3).

Table 3: VENUE STRATEGY INDEXES – AVERAGE VALUES FOR POLICY FIELDS (AVERAGE VALUES ON A SCALE 0–4)

Provision of information to...	National executive institutions	National parliament & parties	European Parliament & EU parties	European Commission	EU Council and/ or perm. repr.	Civil society
rights	1.086	1.005	0.886	0.189	0.644	1.114
environment, energy	0.887	0.457	0.435	0.222	0.442	0.888
finance, economy	0.698	0.302	0.688	0.278	0.672	0.688
Total	*0.924*	*0.620*	*0.632*	*0.220*	*0.550*	*0.932*
F	2.017	7.013	2.246	0.267	1.184	1.435
p	0.139	0.001	0.111	0.766	0.311	0.243
Eta^2	0.042	0.131	0.046	0.006	0.025	0.030

Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

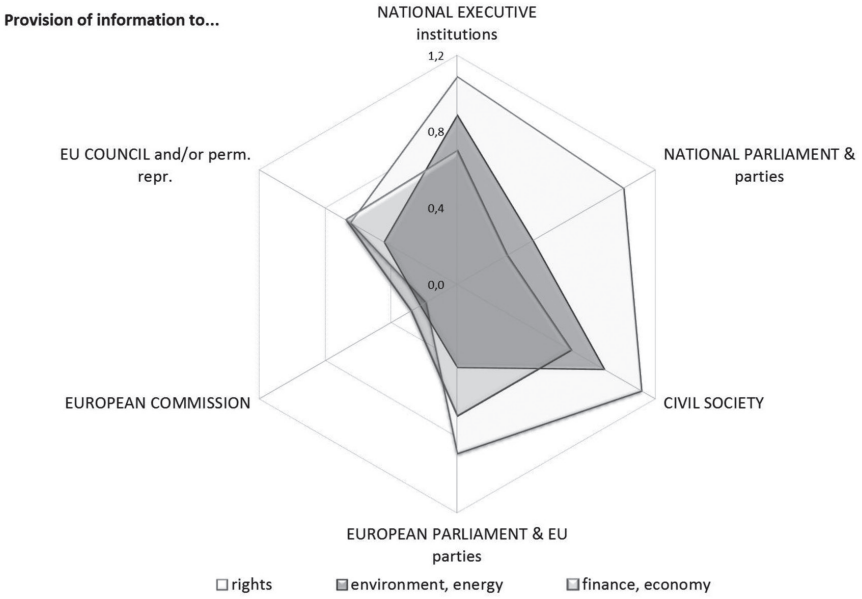
As Figure 2 demonstrates, even if the country of origin is the more significant factor, an IO's venue strategy nevertheless also depends on its policy field. This is not surprising when we consider that policy fields do differ with regard to their institutional anatomy and policy modes (Wallace, 2005).

IOs active in the field of rights will typically orient their lobbying towards the national executive and civil society but also towards the national parliament and parties. IOs in the field of finance and the economy typically pay attention to the European Council and permanent representations, the national executive, civil society and the European Parliament and EU parties. However, compared to IOs in other fields they tend to be the least focused on national parliaments. IOs in the fields of environment and energy spread a comparable amount of information equally to the national executive and civil society.[8] They seem to pay less attention to the European Council and

[8] *The interest organisations in our sample were specifically identified based on their engagement in EU policymaking and– according to the literature (Beyers and Kerremans, 2007; Eising, 2008) – are therefore more likely to lobby at the EU venue.*

permanent representations, the European Commission and the European Parliament/EU parties.

Figure 2: 'VENUE STRATEGY' INDEXES –AVERAGE VALUES FOR POLICY FIELDS (AVERAGE VALUES ON SCALE 0–4)



Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

Overall, the national executives and civil society appear to be the targets of the most lobbying in terms of the intensity of information provision. The European Parliament and EU parties are the most lobbied actor at the EU level.

Lobbying Methods and Techniques and the Differences between Countries

We measured the intensity and the scope of the *lobbying methods and techniques* employed across ten activities.[9] Based on analysis, we can speak of there being two dimensions[10]:

[9] *Answers to the following question were used: 'How frequently did [ORGANISATION NAME] undertake the following activities to try to affect or influence legislative outcomes? (never, rarely, sometimes, frequently or very frequently)' The available answers were arranged on a scale of 1 to 5, however, for the purposes of our analysis the scale was recoded to values from 0 (never) to 4 (very frequently).*

[10] *We used a principal component analysis and a hierarchical clustering analysis. Based on low communalities in the principal component analysis, two variables were excluded: Hiring commercial consultants and Publishing research reports and brochures.*

1. *Media appearances and contacts, publishing*
- Organising press conferences or distributing press releases
- Participating in debates in the media (e.g. giving interviews, editorials, opinion letters, open forums)
- Contacting reporters and journalists to increase media exposure
- Publishing statements and position papers (on your own website)

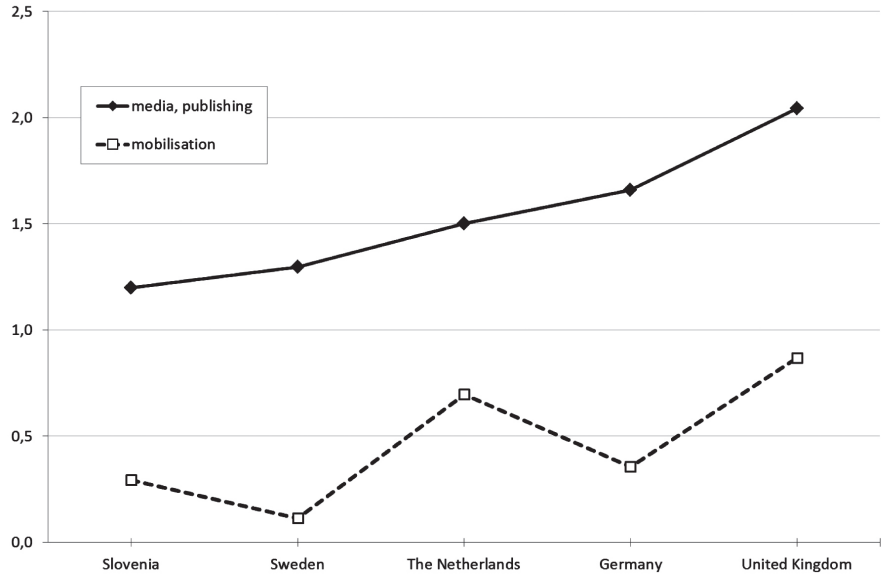
2. *The mobilisation of members and supporters*
- Encouraging members and supporters to lobby policymakers, to initiate letter-writing campaigns or petitions directed at public officials
- Using social media to publicise your position
- Placing advertisements in newspapers and magazines
- Staging protest activities that involve members and supporters (strikes, consumer boycotts, public demonstrations)

For further analysis, we developed an index for each of the two dimensions.[11] Based on our analysis, interest organisations do not appear to adapt their lobbying strategies to the idiosyncrasies of particular institutions (the executive or representatives at the national and EU-level). IOs which are more active at a given level at any institution tend to use more varied methods and techniques. There are no systematic and relevant differences in terms of their targeting national executives, parliaments or European institutions. In this respect, we see the same pattern we previously observed for lobbying strategies, namely: IOs from older EU members more frequently employ various methods and techniques than IOs from newer EU members (see Figure 3 and Table 4).

In general, IOs – regardless of their country of origin – employ the media strategy considerably more frequently than the mobilisation strategy. There are, however, certain differences in national patterns resulting from the overall level of lobbying methods and the strategies employed. For instance, although IOs from the Netherlands also employ the media strategy more frequently than the mobilisation strategy, the frequency ratio is notably smaller compared to IOs from the other countries studied.

[11] *The average value on a scale of 0 to 4 was calculated for all methods included in the index.*

Figure 3: THE USE OF LOBBYING METHODS AND TECHNIQUES – TWO LOBBYING STRATEGY INDEXES (MEDIA AND PUBLISHING; THE MOBILISATION OF MEMBERS AND SUPPORTERS) (AVERAGE VALUES ON A SCALE 0–4)



Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

Table 4: 'LOBBYING METHOD STRATEGY' INDEXES

	Media and publishing	Mobilisation of members, supporters...
United Kingdom	2.044	0.868
Germany	1.658	0.355
The Netherlands	1.500	0.696
Sweden	1.296	0.114
Slovenia	1.200	0.293
Total	1.495	0.445
F	2.297	5.371
p	0.065	0.001
Eta^2	0.092	0.191

Source: own analysis based on data from INTEREURO Multi-Level Governance Module.

The UK stands out when it comes to *mobilisation campaigns* combined with an above-average *use of media*, applying expertise and strategies that use position papers. Germany is notable for its above-average *media* orientation combined with an above-average use of press conferences, the use of

expertise, contacting journalists and the use of position papers. The Netherlands is notable for its above-average *social media* orientation. Sweden is notable for its above-average use of *position papers*. Slovenia is idiosyncratic in that the activity levels of its interest organisations are *below* average in all respects.

Conclusions

Our study addressed the biases of interest representation in the EU political system from a bottom-up perspective. Our main focus was to identify the differences between certain EU member states in terms of the spill over of national IO activities to the EU level. We can summarise our main findings as follows:

Firstly, interest representation is not transmitted equally from the national to the EU level. The main difference appears to be between the IOs from the older member states (Germany, the UK and the Netherlands) and IOs from the newer EU member states (Sweden and Slovenia). IOs from the older EU member states are more active at the EU level than IOs from newer EU member states. These findings are in line with previous country case studies (e.g. Lundberg and Sedelius, 2014).

Secondly, we can observe national patterns in interest organisation strategies in the scope of their targeting the national executive and the national parliament. The Netherlands and the UK are noteworthy for the quantity of information their IOs provide to their national governments; Germany and the UK are noteworthy for the quantity of information their IOs provide to their national parliaments. We can also observe national patterns in interest organisation strategies in terms of the scope of their targeting EU-level institutions for the provision of information: Germany and the UK are notable for the extent to which their IOs target the European Parliament and European parties, while the UK is specifically notable for the extent to which its IOs target the European Commission, the European Council and member state representations. Overall, the greatest differences evident are between the IOs from the UK (*giants)* and those from Slovenia (*dwarfs).*

Thirdly, of the political venues studied, civil society and national executive are the most lobbied, while at the EU level the most lobbied institution is the European Parliament and its political parties (except by Slovenian IOs). This finding is in line with research showing the European Parliament to be a more accessible institution for national IOs to lobby than the Commission (Kohler Koch and Quittkat, 2016). The extreme orientation of Slovenian IOs toward the national executive suggests that further investigation is required. Possible explanatory factors include: the impact of resources on IOs; the lack of socialisation within the EU political system; and the possible

political and cultural residue of the socialist mindset – that it is the state that takes care of representing all interests.

Fourthly, we found that the differences between countries are greater than the differences between policy fields. Interest organisations are more homogeneous within a country than within the same policy field. The other factors proved to be significant only for certain venues. For instance, membership of a European umbrella organisations is a relevant factor for the provision of information to civil society and the European Commission; and the type of IO (economic or non-economic) is a significant factor in the provision of information to civil society and the European Parliament. This supports Wallace's (2005) thesis, that the institutional anatomy of a particular policy and the mode of an IO's lobbying behaviour are important. We also noted that access to EU programme money has no effect on an IO's selection of lobbying venue.

Fifthly, we observed that IOs utilised two lobbying strategies and techniques, namely: (1) media and publishing; and (2) the mobilisation of members and supporters. Although IOs tend to employ media and publishing strategies more often than they mobilise their members, national idiosyncrasies do appear to be significant. As already noted – IOs from older EU members more frequently employ various methods and techniques than IOs from newer EU members. While IOs from the Netherlands are characterised by a more equal instrumentalisation of both strategies (they are also idiosyncratic in their use of social media), IOs from the UK are notable for the sheer *extent* to which they instrumentalise both strategies. IOs from Sweden use position papers more often than IOs from other countries, while IOs from Slovenia are below average in their usage of all methods and techniques. The fact that EU-level policy actors receive considerably more information from some member states than from others clearly illustrates a bias in the inputs from national IOs in EU-level policymaking.

Our findings are noteworthy for several reasons. They reveal major differences in the national activity patterns of interest organisations in the processes of European policymaking. This, combined with the insights into the overall power and influence of certain EU member states at the EU level, translates into major differences in the transmission and representation of national interests in EU policymaking and may lead to considerable biases if these interests are taken into account in the EU policy outputs (such as directives). Identifying these differences in the representation of interests enables us to shed light on the current questions of the EU's democratic deficit. It also enables us to better understand the difficulties in transposing directives into national laws in member states (national interest organisations blocking the transposition of EU law). This in turn feeds back into the question of how legitimate and efficient EU policies are perceived to be across the entire European Union.

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