

Lobbying by Irish Associations on EU
Legislation:
Findings from a Survey

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Lobbying by Irish Associations on EU Legislation: Findings from a Survey

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Executive summary

This document provides a summary of the results of a survey of Irish associations that was carried out between October 2008 and March 2009. For the survey, we contacted a total of 400 associations asking them to fill in a questionnaire. The response rate was 40.75 percent (163 responses). Among the main findings are:

Finding 1: Irish associations engage in substantial legislative lobbying, also at the EU level:

1. 94 percent of our respondents do at least some legislative lobbying;
2. 77 percent engage in at least some lobbying on EU legislation;
3. 16 percent of those that do some lobbying lobby more on EU than on Irish legislation, another 23 percent give equal importance to EU and Irish legislation.

Finding 2: Irish associations' lobbying activity reflects the distribution of competences between the European and the national level of decision-making. Associations that are active in policy fields in which the EU has most competences (agriculture, trade, etc.) engage in more EU lobbying than other associations.

Finding 3: For all associations, inside tactics (direct contacts with decision-makers) are more important than outside ones (demonstrations, press releases, etc.), both at the national and the EU level. There is no indication, however, that outside tactics are even less useful at the European than at the national level.

Finding 4: NGOs engage in more outside lobbying than business or professional associations, with respect to both national and EU legislation:

1. they are more concerned with a "mentality change" among the public;
2. they use more frequently lobbying tactics such as demonstrations and press conferences;
3. they also consider outside tactics more useful;
4. finally, they give the highest weight to the ability to mobilise the public as a resource.

Finding 5: Irish associations have surprisingly good access to even the highest political levels in Ireland and the EU, but there is variation across types of groups in the preferred interlocutor:

1. 71 percent of business associations had at least twice contact with the top level of government in Ireland over the last two years;
2. NGOs are more likely to contact parliamentarians, both at the EU level and in Ireland. In fact, no fewer than 81 percent of NGO respondents had contact with members of the European Parliament over the last two years.

Finding 6: Professional associations seem to have least good access to decision-makers; but contrary to the existing literature there is no indication that their relatively weak EU level lobbying is a result of their strength at the national level.

1 Introduction

This project started as an attempt to collect systematic information on the amount of lobbying activity on European Union (EU) legislation by associations that are mainly active at the national level (in this case, in Ireland). In particular, we wanted to examine the assumption underlying many studies of interest group lobbying in the EU that most of this lobbying is carried out by European peak associations and companies with representation in Brussels.¹ This assumption is partly driven by the easy availability of data on EU interest groups, for example by way of registers maintained by the European Commission and the European Parliament.² It is also partly a result of an early literature suggesting that domestic interests would increasingly lobby in Brussels (Lindberg 1963).

Our hunch was that this focus on Brussels (and to a lesser extent Strasbourg) by much of the academic literature leads to a serious underestimation of the extent of lobbying that is taking place on EU legislation. The reasoning underlying this supposition was that a.) in the modern world (with internet etc.) it is relatively easy to remain informed about developments in Brussels even from a geographic distance; b.) there are coordination and transaction costs to relying on EU federations for interest representation (and these costs increase as the number of EU member states increases); and c.) the potential costs and benefits from EU legislation have increased over the last few years as the scope of EU legislation has increased, making it imperative for groups to defend their interests through all available channels, that is, through their national governments, through EU federations, and directly with the EU-level institutions.

A secondary aim of the project was to provide answers to questions such as: whose voices are being heard in policy-making in the EU? Are there any biases in terms of who has access to policy makers? Which strategies are being used by associations in their attempts at influencing policy? Are there any differences between the national and the European level? These questions are important not least for a normative analysis of policy-making in Europe. Interest groups potentially provide input and output legitimacy to policy-making. They can increase input legitimacy by participating in the process of policy formation. In addition, they can boost output legitimacy by providing policy-makers with expertise that improves the quality of decisions. Interest groups' positive impact on input and output legitimacy should be highest whenever different points of view enjoy approximately equal access to decision-makers.

E.E. Schattschneider (1960: 31 and 35), however, famously observed a “business or upper-class bias” and a “heavy upperclass accent” in the pressure system of the U.S. The study of interest groups thus necessarily comes back to the question whether such a bias exists in a specific political system. Does the EU interest group system just reinforce biases that exist at the national level, or does it empower groups that are relatively weak at the national level (for this question, see also Greer et al. 2008)? It

¹ Justin Greenwood's (2007) classic textbook on interest representation in the EU, for example, although mentioning a national channel to influence, mainly concentrates on EU-level groups. Rainer Eising (2008) is one of the few who have given serious attention to national associations.

² These registers can be accessed at: http://europa.eu/lobbyists/interest_representative_registers/index_en.html [last accessed 5 May 2009].

may be that groups with little influence at the national level are particularly engaged at the EU level, with the aim of making up for their weakness in national politics. This effect may be reinforced because groups that are strong at the national level have little incentive to focus on the EU level. Alternatively, the EU may reward those that are strong at the national level, thus reinforcing existing biases.

To get a grip on these issues, we decided to carry out a survey of Irish associations on their lobbying activity, with a focus on advocacy with respect to EU *legislation*. In concentrating on EU legislation, we made a conscious decision to exclude lobbying that is aimed at influencing the implementation of EU law at the national level or the interpretation of laws by regulatory agencies (although we had a few questions that related to the latter issue). We did so because it is very difficult to distinguish between lobbying on national laws and laws that are debated in the Oireachtas (the Irish parliament), but are only aimed at transposing EU law. Moreover, systematically including lobbying of regulatory agencies would have made the questionnaire too long.

This paper provides a discussion of the process of carrying out the survey, followed by a summary of the main findings.

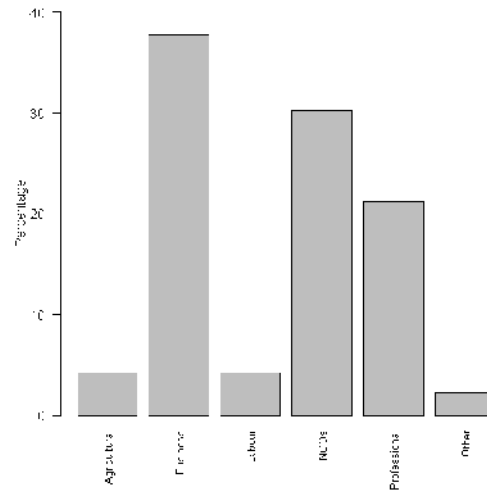
2 The Population

We used the *Administration Yearbook & Diary 2008*, published by the Institute of Public Administration, to arrive at a list of Irish associations that could potentially engage in lobbying. This yearbook includes listings of trade and professional organisations, and social, cultural and political organisations in Ireland. From the ones included in the yearbook, we selected all groups except political parties, official or semi-official bodies that are restricted in their lobbying activity (for example, the International Police Association), associations located in Northern Ireland (YouthNet), sporting groups (the Irish Bowling Association), and learned societies that exist purely to promote an academic discipline. After excluding associations that no longer existed or that were subunits of other associations that were already included in our survey, we ended up with a panel size of 400 associations.

While the yearbook's listings are reasonably comprehensive, we certainly missed some associations that engage in some lobbying at some times. Nevertheless, we are confident to have considered a representative cross-section of the actual population of the potentially politically-active *associations* in the Republic of Ireland. This is not the complete lobbying population, however. For a variety of reasons, we decided not to consider firms, which may or may not use business associations in their lobbying activity (for a study of business lobbying in the EU, see for example Coen 2009).

It was not always easy to select the associations for inclusion in our survey. For example, it was sometimes difficult to differentiate between purely scholarly associations and professional associations that defend an interest vis-à-vis political decision-makers. Moreover, we included associations with an office in the Republic of Ireland, even though they may form part of a larger foreign-based association, as long as we considered the Irish branch to have sufficient autonomy to take decisions on whether or not to engage in lobbying (for example, the Irish section of the Association of Chartered Certified Accountants, ACCA Ireland).

FIGURE 1: COMPOSITION OF THE POPULATION



In Figure 1, we show the composition of the resulting population of associations, broken down by type. A business association is a group that represents companies, irrespective of whether it is broad or specific to a sector of the economy. By contrast, a professional association mainly represents individuals that form part of a specific profession (that is, they have a specific training as lawyers, accountants, etc.). Its main task is to provide services to its members, whereas the main task of business associations tends to be to engage in political activity. A non-governmental organization (NGO) is defined as a group that defends interests that are broader than the economic interests of its members; broadly speaking, it advocates public goods such as public health, development, environmental protection, and human rights. Labour unions are defined by their official status as actors that are allowed to engage in wage negotiations. Finally, agricultural associations are business associations that represent agricultural interests. The category “others” includes associations that we could not classify in any of the other categories (for example, the Association of Community and Comprehensive Schools).

Again, for some associations the distinction between types is not straightforward: an association, for example, can be both a trade union and a business group (for example, Veterinary Ireland) or both a trade union and a professional association (the Irish Medical Organisation). We decided to code an association as a labour union whenever it is officially recognised as having such a status, even if it also acts as a professional association.

Of the 400 associations included in our survey, the largest group comprises business associations (37.8 percent), followed by non-governmental organizations (30.3 percent), and professional associations (21.3 percent).

3 The Survey

We developed a questionnaire with 28 questions in six different parts, including questions on lobbying strategies, lobbying resources and cooperation, lobbying targets, EU lobbying, and basic features of the organisation responding to the survey.

Our estimate was that it would take about 12 minutes to complete the survey. In fact, most of the respondents that accessed the survey online (see below) required between 10 and 15 minutes.

We decided to carry out the survey online, using an open-source tool called LimeSurvey (<http://www.limesurvey.org/>). The version that we used was 1.70+ (in the meantime, a new, improved version, became available). We opted for this software as it gives the user much more flexibility than web-based services such as SurveyMonkey (see the discussion in Appendix I). We considered this flexibility essential to make the survey look professional and thus increase the response rate. To run LimeSurvey, we purchased a web domain (<http://www.lobbysurvey.net>) with HostColor (www.hostcolor.com), a hosting service that offers a pre-installed version of LimeSurvey.

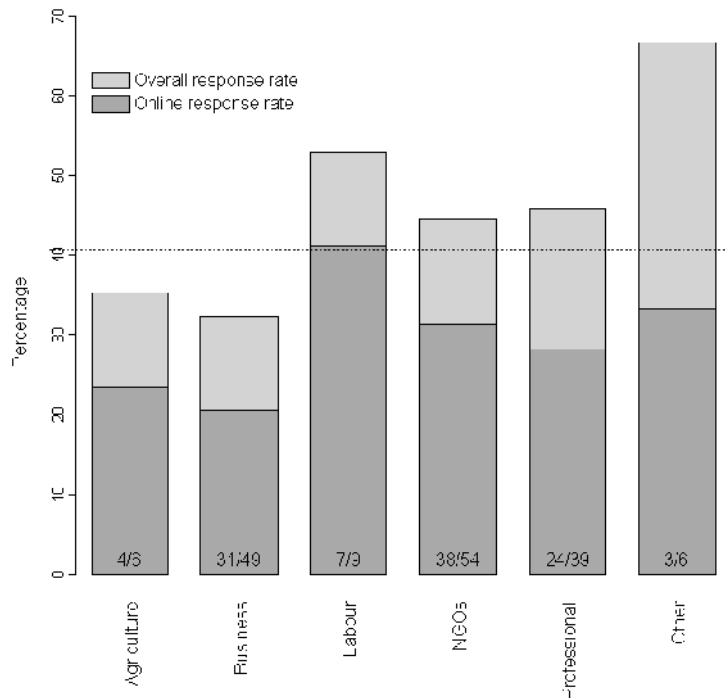
We started the survey in early October 2008, sending all associations an email that included a unique code to access the online survey. Four weeks later, we sent a second round of e-mails to all associations that had not yet responded. Based on these e-mail contacts, we received 107 responses up to late 2008. The response rate of 26.8 percent can be considered reasonable given the fact that some of the e-mail addresses that we had found did not work and that often we had to send the e-mail to general enquiry addresses (info@...), rather than to specific individuals. As a point of comparison, an online survey carried out with groups participating in DG Trade's Civil Society Dialogue had a response rate of only 8 (sic!) percent (Slob and Smakman 2006). In fact, of 1291 e-mails that were sent in the framework of that survey, 182 bounced back because of invalid e-mail addresses. Only 188 respondents had a look at the survey, and 105 completed it.

Although much better than that, we considered the response rate of 26.8 percent too low for our purposes. In late 2008 and early 2009, we thus sent hardcopies of the survey to all associations that had not yet responded (excluding two associations for which we could not find a physical address and two associations that had responded to the emails saying that they were not willing to fill in our questionnaire).

This effort proved successful, by increasing the response rate to 40.75 percent (or 163 responses). This means that by sending some 290 hardcopies, we could elicit another 56 responses. While this response rate of 19.3 percent for the hardcopy questionnaires may appear low, it has to be seen in the light of the fact that those associations that were more likely to respond had already replied to our e-mail request. The figure thus underestimates the power of a hardcopy to elicit a response. Since some respondents failed to answer some questions, the actual response rate for most questions varies between 35 and 40.75 percent.

We expected to have the highest response rate from business associations, which on average tend to have more resources than other associations. The evidence does not confirm this expectation (see Figure 2). In absolute terms, we received the largest number of responses from NGOs (see the numbers at the bottom of the bars in Figure 2), followed by business and professional associations. Relative to the number of associations in the population, the response rate for business associations was actually the lowest for all categories (32 percent). By contrast, the response rates for professional associations and NGOs were 45.9 percent and 44.6 percent respectively.

FIGURE 2: RESPONSE RATE BY TYPE OF ASSOCIATION



Note: the dashed line indicates the mean across all types of associations. The absolute number of responses received for each type of association is provided at the bottom of the bars (first the number received online and then the total number of responses). The dark shaded bars are the online response rate and the light shaded parts the overall response rate for each type of association.

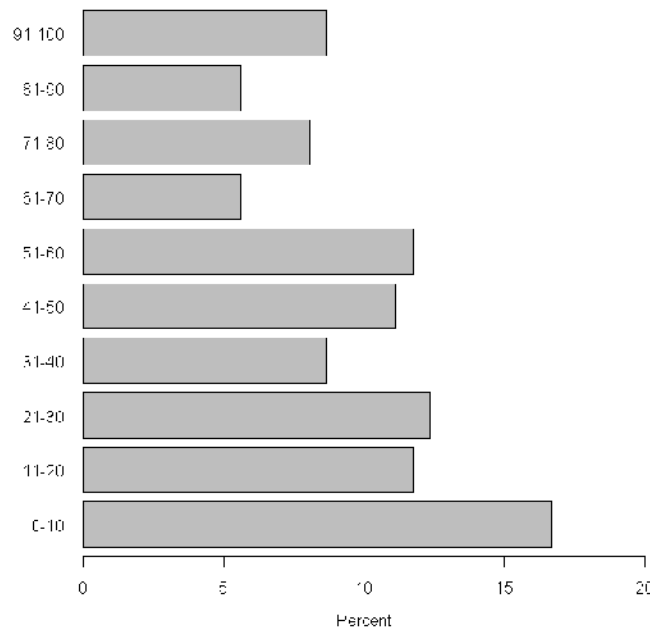
No fewer than 52.9 percent of the labour unions responded to the survey. Nevertheless, overall the relatively similar distributions across types of actors in the population and the sample of respondents suggest that inferences beyond the sample are possible. The small absolute numbers of responses from agricultural associations and labour unions make us concentrate on the other three types of associations in the analysis of the data below.

4 The Respondents

To provide an indication of who replied to our survey, we first present some basic data on our respondents. First, it is evident that on average the associations that responded are relatively small. Their arithmetic average of staff members is 20.6; the median is 3.25. The mean is reduced to 13.8 when excluding one outlier with more than 1,000 employees. Broken down by type of association, labour unions are those with the largest number of employees (a mean of 128), followed by NGOs with a mean of 40.5. The mean staff number for business associations (6.5) is comparable to the one mentioned for EU-level business federations (5 according to Greenwood 2007: 52). The differences in staff numbers across types of associations may explain why both labour unions and NGOs had higher response rates than business associations.

Second, advocacy is an important task for the average responding association. The average association has slightly fewer than two members of staff working on

FIGURE 3: THE IMPORTANCE OF ADVOCACY FOR THE ASSOCIATIONS



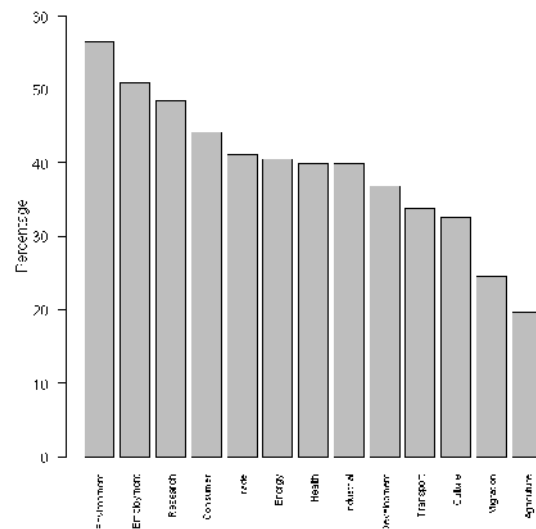
Note: the graph shows the percentage of associations that indicated that advocacy accounted for 0-10, 11-20, etc. of their overall activity.

advocacy and public relations (excluding volunteers that are important for some NGOs). There is relatively little variation on this across the types of associations that we distinguish (agricultural, professional, business, NGOs, and labour unions), with the exception that professional associations have fewer staff members working on advocacy than the mean (1.3) and labour unions more (5.7).

This point is further confirmed when considering the responses to the question on the importance of the representation of interests as compared to the organisation's overall activity (see Figure 3). The average response to this question was 46 percent. Two associations indicated that they did not do any lobbying; ten responded that advocacy is all they do. 49 associations invest 20 percent or less on advocacy. 23 invest 80 percent or more. The mean is higher for business associations at 54.8 percent (statistically significant, with $p < 0.01$) and lower for professional associations and NGOs at 38.9 and 40.5 percent respectively. Interestingly, a larger number of staff does not increase an association's focus on advocacy, even when excluding the one association that is a huge outlier with respect to staff (more than 1000 employees). Comparing the importance given to advocacy across policy fields, we find that the associations that are least interested in advocacy are those that are active with respect to development and migration. On the opposite end of the spectrum are associations with a focus on health policy.

Third, most (130, that is 79.8 percent) of the responding associations are membership based. 79 associations have individuals as members, 68 companies, 35 associations, and 19 other kinds of organizations. 38 have more than 500 individual members, with the largest having 200,000 members. Eight associations have more than 500 companies as members.

FIGURE 4: THE IMPORTANCE OF SELECT POLICY FIELDS



Note: the graph shows the percentage of respondents that indicated that a policy field was either important or very important for their association.

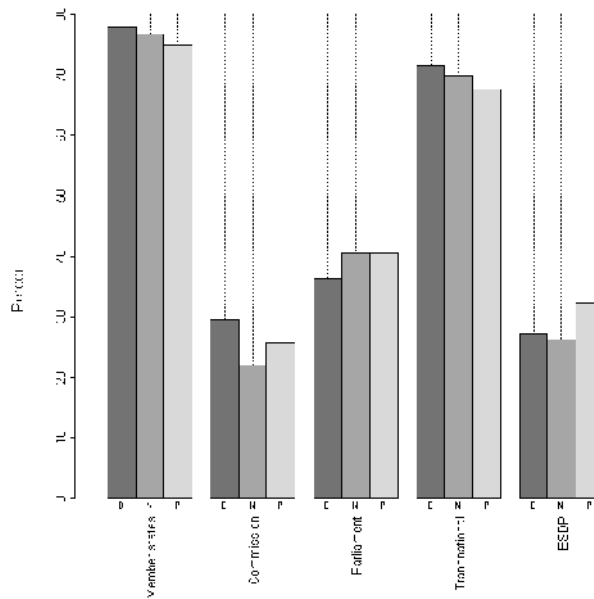
Fourth, environmental policy is the one policy area that most associations consider either important or very important (57 percent) (see Figure 4). Also important are employment policy (51 percent) and research (49 percent). At the bottom of the league is agricultural policy with only 20 percent. Only looking at business associations, environmental policy is even more important, with 65 percent indicating that it is important or very important for their association. Associations also were given the opportunity to specify other policy fields, beyond those mentioned in Figure 3, that were important to them: among those mentioned were construction policy, intellectual property rights policy, family policy, foreign policy, social policy, communications policy, competition policy, human rights policies, and women’s rights.

Fifth, pretty much half of our respondents form part of EU federations (80, that is 49 percent), such as Business Europe, the European Consumers’ Organisation (BEUC), or the European Trade Union Committee for Education (ETUCE). This means that many of them may receive information on EU-level developments, such as pending legislation, from these federations. It may also mean that a large part of their EU lobbying is delegated to the level of these federations.

Finally, overall our respondents are rather sceptical with respect to the idea of delegating further powers to the European level, be that to the Commission, to the Parliament, or with respect to European security and defence policy (ESDP). We can say so because our questionnaire contained five statements on desired features of the EU, for each of which respondents could indicate whether they strongly agreed, agreed, were neutral, disagreed, or strongly disagreed. The five statements were:

1. The member states should be the central pillars of the European Union.
2. The European Commission should receive more authority in shaping EU policies.
3. The powers of the European Parliament should be extended.
4. European integration is necessary to cope with transnational problems.

FIGURE 5: VIEWS ON THE EU, BY TYPE OF ASSOCIATION



Note: B=business associations; N=NGOs; P=professional associations. The figure shows the percent of respondents that agreed or strongly agreed with the statements listed in the text.

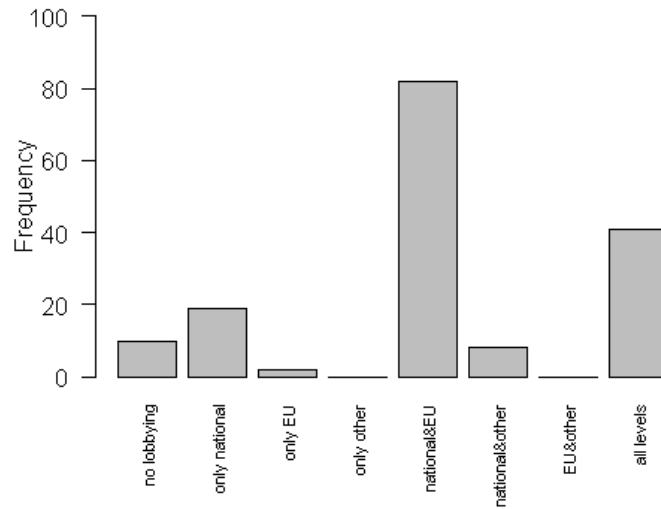
5. Ireland should participate in an integrated European security and defence policy.

In Figure 5, we show the percentage of respondents that agreed or strongly agreed with these statements, by type of association. Interestingly, there is very little variation across types: no type is consistently more favourable to further European integration than any other.

We also aggregated responses to these five questions into an aggregate index of whether the respondents were in favour of a further transfer of authority to the EU level (extent of agreement with statements 2 to 5) or not (extent of agreement with statement 1). We recoded the index so that those that strongly agreed with statements 2 to 5 and strongly disagreed with statement 1 were given a score of 20 and those that strongly agreed with statement 1 and strongly disagreed with statements 2 to 5 a score of 0. Only 131 associations are included in this index, as the other 32 failed to answer at least one of the five questions needed to construct the index.

Looking at the results, most respondents are located somewhere in between the two extremes. Nevertheless, two respondents had the minimum score of 0 (strongly opposed to any further delegation) and one respondent the maximum score of 20 (strongly favoured further delegation). Beyond this, it turns out that respondents from business associations are slightly more in favour of further delegation than respondents representing other types of associations (10.5 for business as compared to 9.8 for NGOs, but a t-test shows that the difference between the means is not statistically significant). Moreover, respondents from associations that form part of an EU federation are slightly more favourable towards the EU than respondents from other associations (means of 10.4 as compared to 9.6, difference not statistically significant, $p=0.13$).

FIGURE 6: LEVEL OF LOBBYING ACTIVITY



In short, the associations that responded to our survey are on average rather small, have about two members of staff dealing with advocacy, are membership based, are mainly concerned with environmental, employment, and research policy, and are rather sceptical with respect to further EU integration.

5 Lobbying on Irish and EU Legislation

We asked respondents to indicate the percentage of all their legislative lobbying that they dedicate to national and EU legislation, and other (among the possibilities were local, regional, foreign, and international legislation). Ten of the 163 associations that responded to our survey indicated that they did not do any legislative lobbying at any level. 19 only lobbied at the national level (see Figure 6).

Interestingly, no fewer than 125 associations (77.2 percent) indicated that they did at least some lobbying on EU legislation. What this suggests is that a relatively large number of Irish associations engage in some lobbying on EU legislative proposals. By contrast, the current, voluntary European Commission register of interest representatives (<https://webgate.ec.europa.eu/transparency/regrin/welcome.do>) includes only seven associations with head office in Ireland (plus one company) (as of 19 March 2009).³ It hence seems to severely underestimate the extent of lobbying by national associations on EU legislation.

³ The number of Irish associations in the new register's predecessor – CONNECS ("Consultation, the European Commission, and Civil Society") – was not higher.

FIGURE 7: WHICH LEVEL IS MOST IMPORTANT – EU OR NATIONAL?

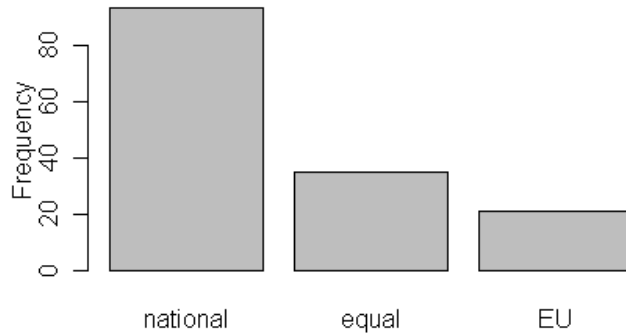
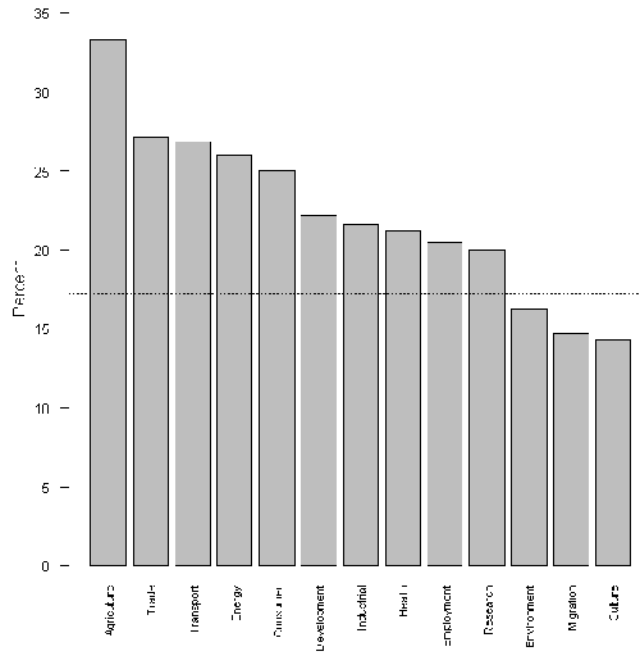


FIGURE 8: PERCENTAGE OF ASSOCIATIONS FOR WHICH EU LOBBYING IS MORE IMPORTANT THAN NATIONAL LOBBYING, BY POLICY FIELD



Note: the figure shows the percentage of respondents by policy field that indicated that EU lobbying was more important than national lobbying for the association. The dotted line indicates the mean across all associations.

Of those that indicated that they did some legislative lobbying, however, a substantial majority did more legislative lobbying at the national than the EU level (Figure 7). Only 24 out of the 152 associations with some legislative lobbying (15.8 percent) were more active on the EU than the national level. Another 35 associations devoted equal importance to EU and national lobbying. By type of association, the percentage of associations that do more EU than national legislative lobbying is highest for professional (16.7 percent) and lowest for business associations (10.9 percent). This finding is surprising given that it is often accepted that national professional associations are relative weak with respect to EU lobbying (Greenwood 2007: 18 and 73).

Only looking at those associations that form part of an EU federation, the percentage of those that do more EU lobbying increases (slightly counter-intuitively, as one may expect them to rely more on the federation in their EU lobbying) to 29 percent.

We also looked at the importance of EU lobbying across policy fields (see Figure 8). Doing so reveals that there is considerable variation, with those for which agricultural and trade policy is particularly important being much more likely to focus more on EU than national legislation (33 and 27 percent respectively) than those for which migration and asylum or cultural policy is important (15 and 14 percent respectively). What is interesting about this is that agriculture and trade are policy fields with substantial EU authority, whereas for cultural policy the EU has little authority.⁴ Delegation of authority to different levels thus influences lobbying activity.

Finally, we included a qualitative question on the specific EU legislative acts on which the respondents had engaged in lobbying. We received 278 responses to this question (respondents could indicate several legislative acts). While most legislative acts received only one or two mentions, several acts stick out as having stimulated considerable lobbying by Irish associations. For example, nine associations indicated that they had done lobbying on the recent (2006) “Directive on services in the Internal Market”; another six on value added tax legislation (two recent directives and a regulation); and five on the “European Community Regulation on chemicals and their safe use” (REACH, 2007).

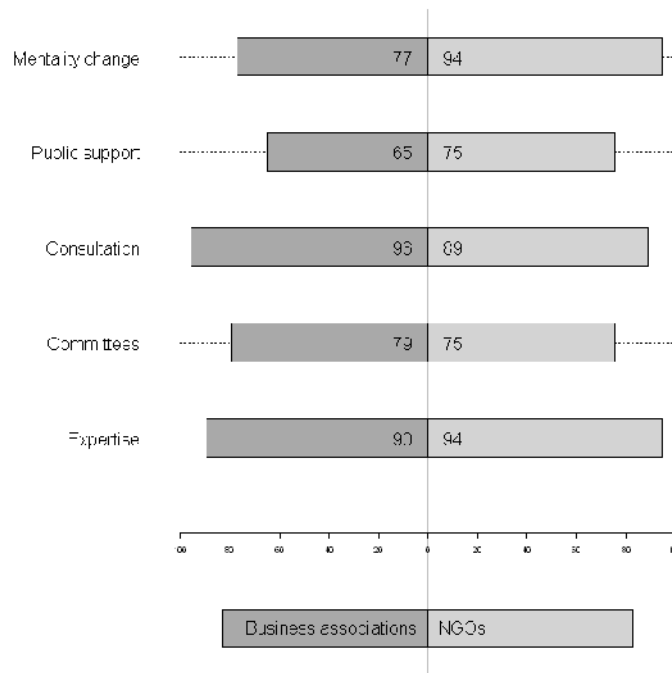
6 Lobbying Strategies

The main focus of the questionnaire was on the lobbying behaviour of our respondents. Question 3 asked respondents to indicate the extent to which they agreed or disagreed with a series of statements on what the representation of interests entailed:

1. Promoting a mentality change among the general public
2. Showing government actors that you enjoy broad public support
3. Promoting consultation and co-ordination between different organisations
4. Representing members in political committees and hearings
5. Providing government agencies with expertise and information

⁴ One way (admittedly very rough) of gauging the importance of a policy field for the EU is to look at staff numbers in Directorates-General (DG) in the European Commission. DG Agriculture had 1122 employees in 2008 and DG Education and Culture 604. Agriculture had a budget of €54 billion, which compares to €1.3 billion for education and culture (European Union 2008). Even more clear-cut is the result when looking at the number of proposals for directives, regulations, and decisions introduced by the European Commission by policy field. In 2002 (the most recent data available through the database by König et al. 2006), 25.7 percent of all policy proposals were in the field of agriculture, and 29.4 percent in the field of trade.

FIGURE 9: DEFINITION OF LOBBYING, NGOs AND BUSINESS ASSOCIATIONS COMPARED



Note: the figure shows the percentage of respondents that agreed or strongly agreed with the statements provided in the text above.

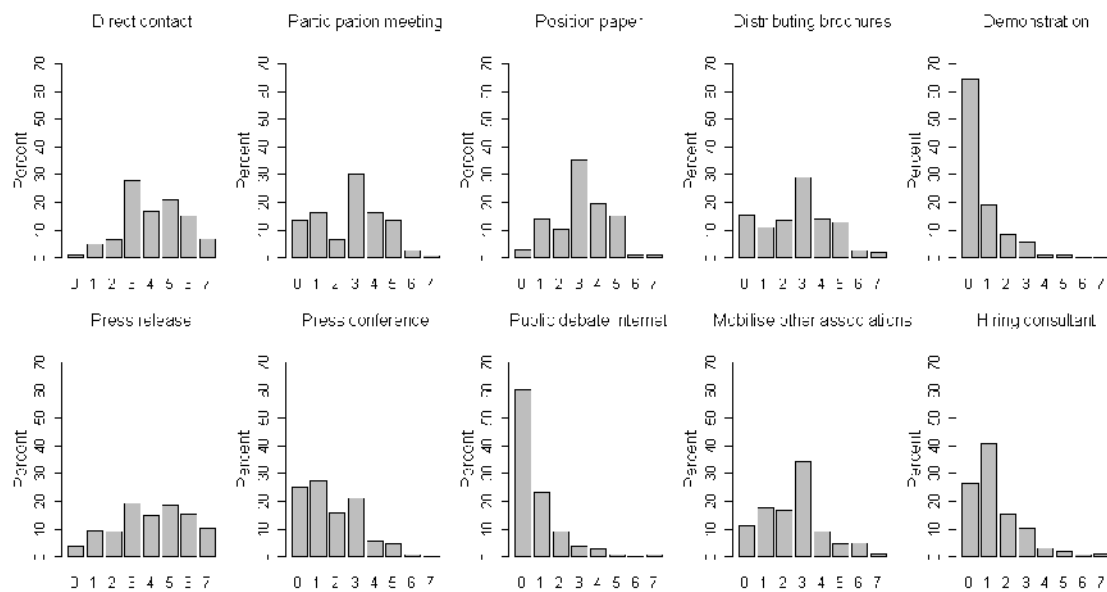
The aim of including this question was to get a first impression of the relative importance of “outside” and “inside” lobbying strategies for Irish associations (for these terms, see Kollman 1998). An outside lobbying strategy comprises such tactics as organising demonstrations, distributing press releases, and putting advertisements in newspapers.⁵ It is generally aimed at either changing public opinion or showing government popular support for a position (statements 1 and 2 above). An inside lobbying strategy comprises tactics such as direct contacts with decision-makers, testifying in parliament, and serving on government advisory boards (statements 3-5 above).

An initial analysis does not reveal a lot of variation across the five statements, with the means varying between 4.0 (demonstrating public support) and 4.4 (providing expertise and information). However, on average the inside strategy seems to be slightly more important than the outside strategy.

More interesting is an analysis of differences across types of associations. Figure 9 shows the percentage of respondents that stated that they agreed or strongly agreed with our statements on what the representation of interests entailed, for both business associations and NGOs. A few differences are evident. For business associations, demonstrating public support is slightly less important than for NGOs. Even more apparent is that for business associations, promoting a mentality change among the public is less important than for NGOs. By contrast, attending committees is slightly

⁵ We use the term “strategy” to refer to sets of tactics; tactics, in turn, are individual, observable actions.

FIGURE 10: TACTICS USED TO INFLUENCE *IRISH* LEGISLATION



Note: the figure shows the percentage of respondents that use a tactic with a specific frequency, where 0=never, 1=less than yearly, 2=once a year, 3=about 2-5 times a year, 4=about 6-9 times a year, 5=about 10 to 15 times a year, 6=app. biweekly, and 7=on a weekly basis.

more important. These findings suggest that for business associations “inside” lobbying is relatively more important than for NGOs.

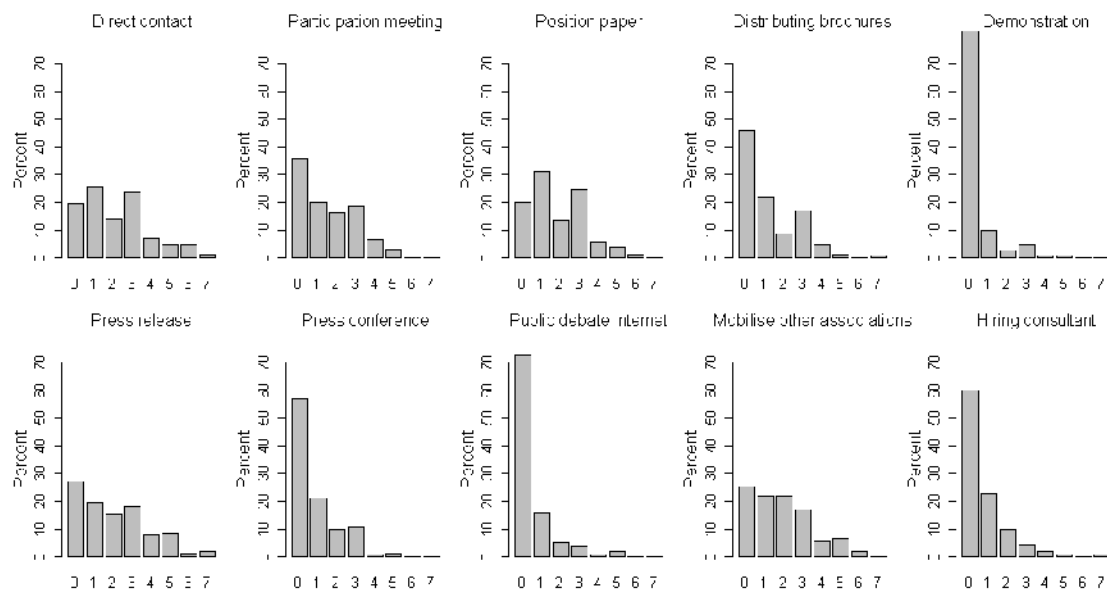
The centre piece of this section of the questionnaire was a series of questions on the frequency with which associations used a series of tactics to represent their interests on Irish and EU legislation. The tactics that we listed were:

- Direct contacts with policymakers and/or public officials
- Participating in meetings organised by political institutions
- Preparing a detailed position paper
- Distributing folders and brochures
- Organising or participating in demonstrations and/or street actions
- Distributing a press release
- Organising a press conference
- Initiating a public debate on the internet
- Trying to mobilise other associations/interest groups
- Hiring a consultant

Respondents could indicate that they use these tactics never, less than yearly, once a year, about 2-5 times a year, about 6-9 times a year, about 10 to 15 times a year, approximately biweekly, or on a weekly basis.

Figure 10 first presents the responses from all associations to the question on which tactics they used to influence *Irish* legislation (question 4 in the questionnaire). Figure 11 does the same for *EU* legislation (question 6). Figure 10 shows substantial variation in the importance of these tactics. Participating and/or organising a demonstration and using the internet to stimulate a public debate are tactics that are used far less frequently than directly contacting decision-makers and distributing a press release. Treating the frequency measure as an interval variable (which seems defensible given that it has eight ordinal values), the mean responses vary from 4.1

FIGURE 11: TACTICS USED TO INFLUENCE *EU* LEGISLATION



Note: see the note for Figure 10.

(app. nearly monthly) for direct contacts with policymakers to 0.6 (less than yearly) for organising or participating in demonstrations. High values are also given to distributing a press release (4.0) and preparing a detailed position paper (3.1). Other low values are for initiating a public debate on the internet (0.7) and hiring a consultant (1.4).

For the case of EU legislation, Figure 11 shows similar variation. Again demonstrations and the internet turn out to be used far less frequently than other tactics. The values here range from 2.1 for direct contacts, over 1.8 for mobilising other associations and preparing a position paper to 0.3 for organising and/or participating in a demonstration.

It is also possible to compare lobbying on Irish and EU legislation. Overall, as could already be derived from the data presented above, Irish associations engage in less lobbying on EU than on national legislation. The relative frequencies of the tactics, however, are pretty similar. The only major difference is that on EU legislation, Irish associations are relatively more eager to engage in cooperation with other interest groups (third-most important tactic for EU legislation, but only sixth-most for national legislation).

The next aspect that we consider is the relative importance of “inside” to “outside” lobbying strategies for both national and EU legislation. Making direct contacts with policymakers and/or public officials and participating in meetings organised by political institutions are straightforward inside tactics. By contrast, distributing folders and brochures, organising or participating in demonstrations and/or street actions, distributing a press release, organising a press conference, and initiating a public debate on the internet are clear-cut outside lobbying strategies. Preparing a detailed position paper and hiring a consultant can be both inside and outside tactics. The analysis shows the mean across the two inside strategies is 3.4, which is significantly higher than the mean across the five outside strategies (2.0). For EU legislation, the respective values are 1.8 and 1.0. At both levels, therefore, Irish associations put more

FIGURE 12: TACTICS USED, BY TYPE OF ASSOCIATION, *IRISH* LEGISLATION

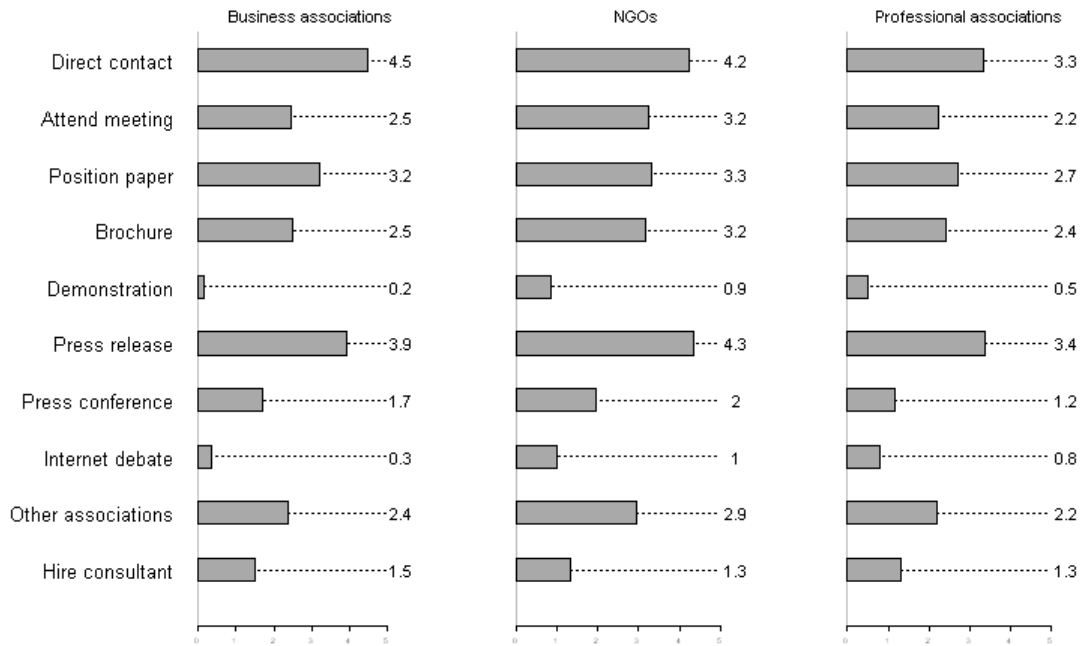
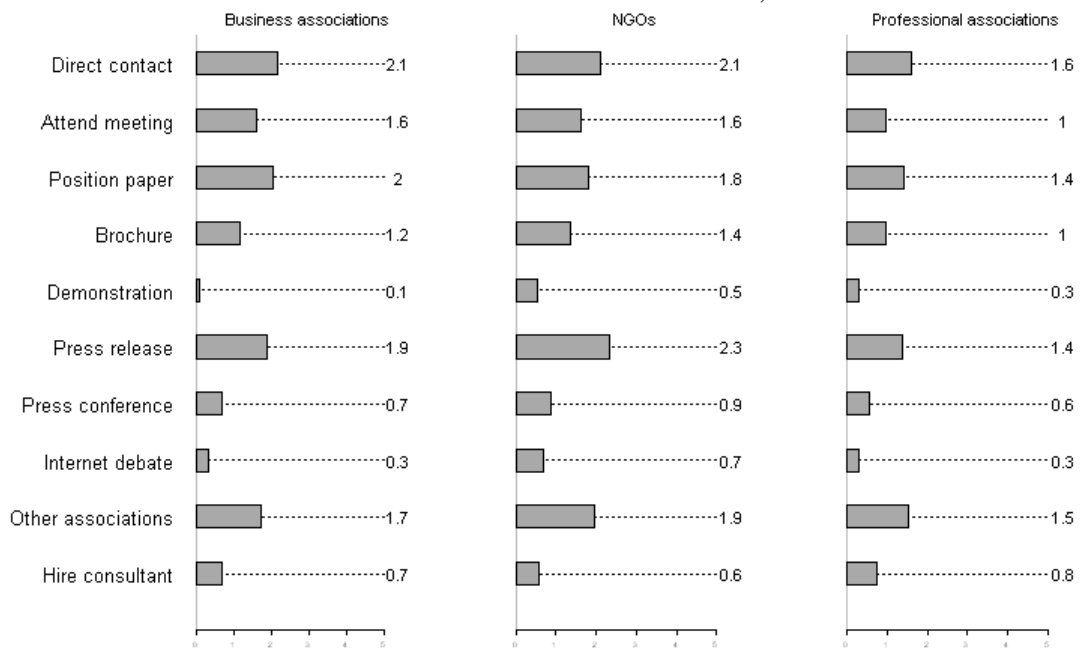


FIGURE 13: TACTICS USED BY TYPE OF ASSOCIATION, *EU* LEGISLATION

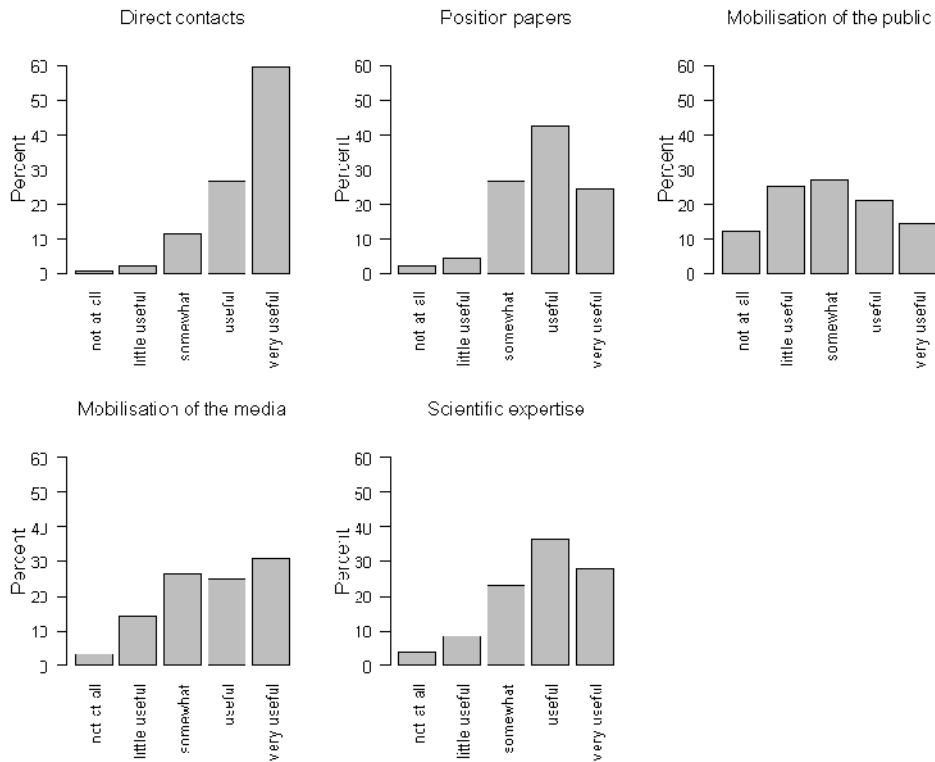


Notes to Figure 12 and 13: the figures show the means of the responses for business associations, NGOs, and professional associations, where 0 implies that an association never uses a tactic and 7 that it uses the tactic on a weekly basis.

emphasis on inside than outside strategies, with the ratio being basically the same (1.7:1 as compared to 1.8:1).

Also interesting is whether there are any differences across different types of associations. For this, we compare the average responses for each of the ten tactics for business associations, NGOs, and professional associations, both at the national (Figure 12) and the EU level (Figure 13). Figure 12 shows some differences across types of associations. For example, NGOs are much more likely to initiate an internet

FIGURE 14: USEFULNESS OF TACTICS, *IRISH* LEGISLATION

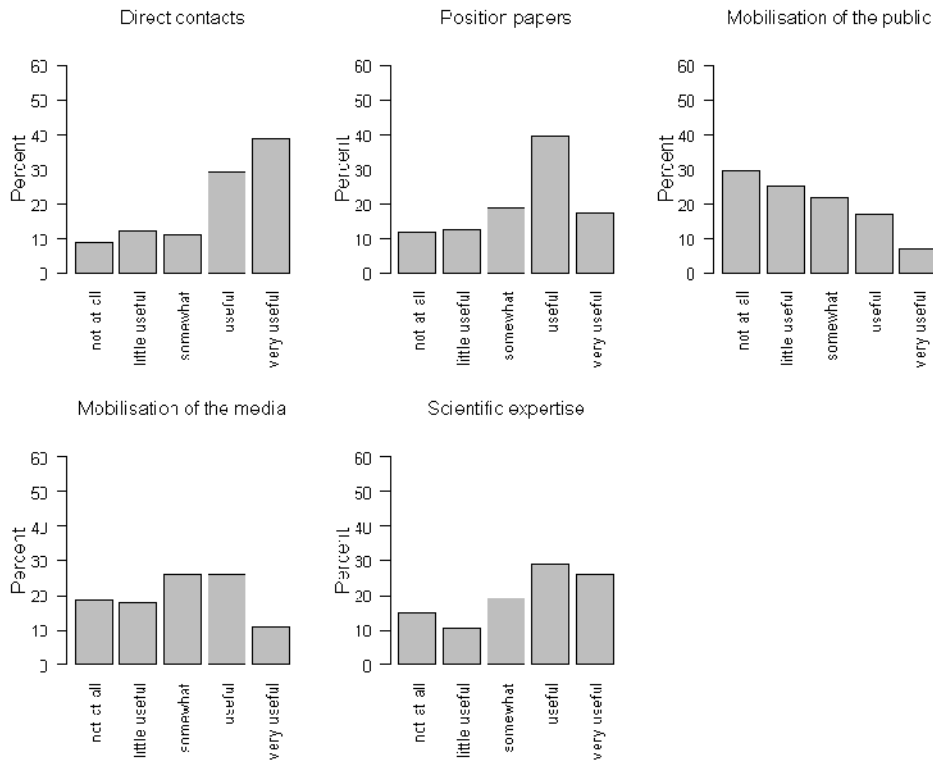


debate and to partake in a demonstration than are business associations. They are also more likely to attend meetings organised by policy-makers than both business and professional associations. Professional associations have fewer direct contacts with policy-makers than both of the other types of associations. Especially business associations seem to have good access to decision makers. Overall, outside relative to inside strategies are most important for professional associations. The ratio of inside to outside for professional associations is 1.5:1, for NGOs 1.7:1 and for business associations 2.0:1. This seems to be mainly an indication of the relative weakness of professional associations, as the ratio is driven by a low value on the two inside tactics.

Figure 13 provides the same evidence for EU legislation. The conclusion is very similar to the one for Irish legislation. Again, participating in demonstrations and instigating internet debates are tactics that are used most frequently by NGOs. Professional associations both have fewer direct contacts and attend fewer meetings than the other two types of associations. The relative importance to NGOs of outside lobbying is slightly more important with respect to EU than Irish legislation. The ratio for NGOs of inside to outside is 1.6 and for business associations 2.3.

We cross-checked these findings by asking respondents to indicate how useful they find different ways of representing their interests with respect to both Irish and EU legislation. The tactics for which we collected this data are direct contacts with policymakers and/or public officials; position papers; mobilisation of the public; mobilisation of the media; and presenting scientific expertise. For each of these tactics, respondents could indicate that it was very useful, useful, somewhat useful, little useful, or not at all useful for the representation of their interests.

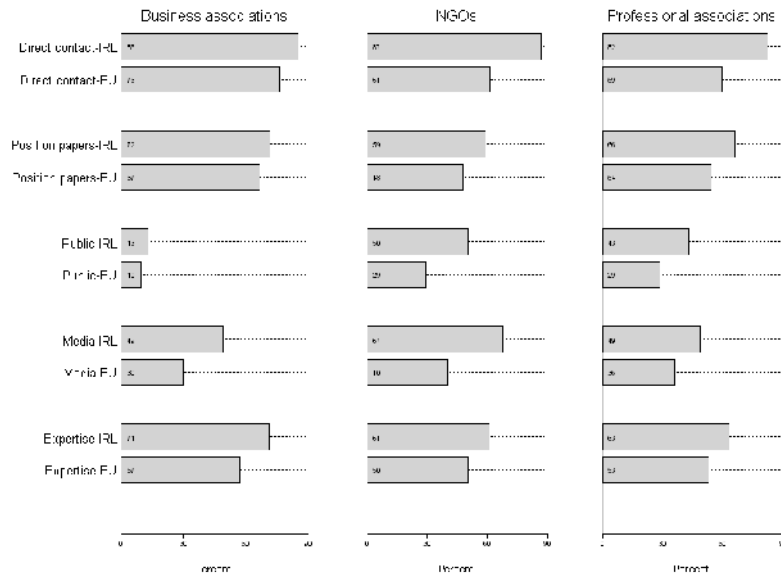
FIGURE 15: USEFULNESS OF TACTICS, *EU* LEGISLATION



The data again offers some interesting findings (see Figures 14 and 15). Looking at Figure 14 first, it becomes obvious that direct contacts with policy-makers are seen as the most useful way of representing interests on Irish legislation. Also position papers and the mobilisation of the media are seen as useful. The mobilisation of the public, by contrast, is considered very useful only by a small number of respondents. The situation is similar for the representation of interests on EU legislation, although less stark (see Figure 15). The tactic of direct contacts again receives the highest number of “very useful” responses. By contrast, the tactic of mobilising the public receives the lowest number of such responses. Comparing the two figures, it can be said that overall there is more scepticism that any of these tactics will prove useful with respect to EU legislation.

Furthermore, we looked at differences across types of associations. For this, we aggregated the percentage of respondents that indicated that they found a tactic either useful or very useful, for both EU and Irish legislation (Figure 16). Several findings stand out: first, while with respect to Irish legislation, all three types of associations agree in their assessment that direct contacts with policy-makers are useful or very useful, this is not the case for EU legislation. On the latter, business associations are much more optimistic about the value of direct contacts than both NGOs and professional associations. At both levels, business associations are most confident in the value of position papers, whereas NGOs (and to a lesser extent professional associations) consider mobilising the public a more useful strategy than business interests (especially with respect to Irish legislation, where the percentages are 50 and 13 percent respectively). NGOs also consider mobilising the media a more useful strategy than both business and professional associations, while business associations

FIGURE 16: USEFULNESS OF TACTICS, BY TYPE OF ASSOCIATION



Note: the figure shows the percentage of respondents (by type of association) that considered a tactic either useful or very useful.

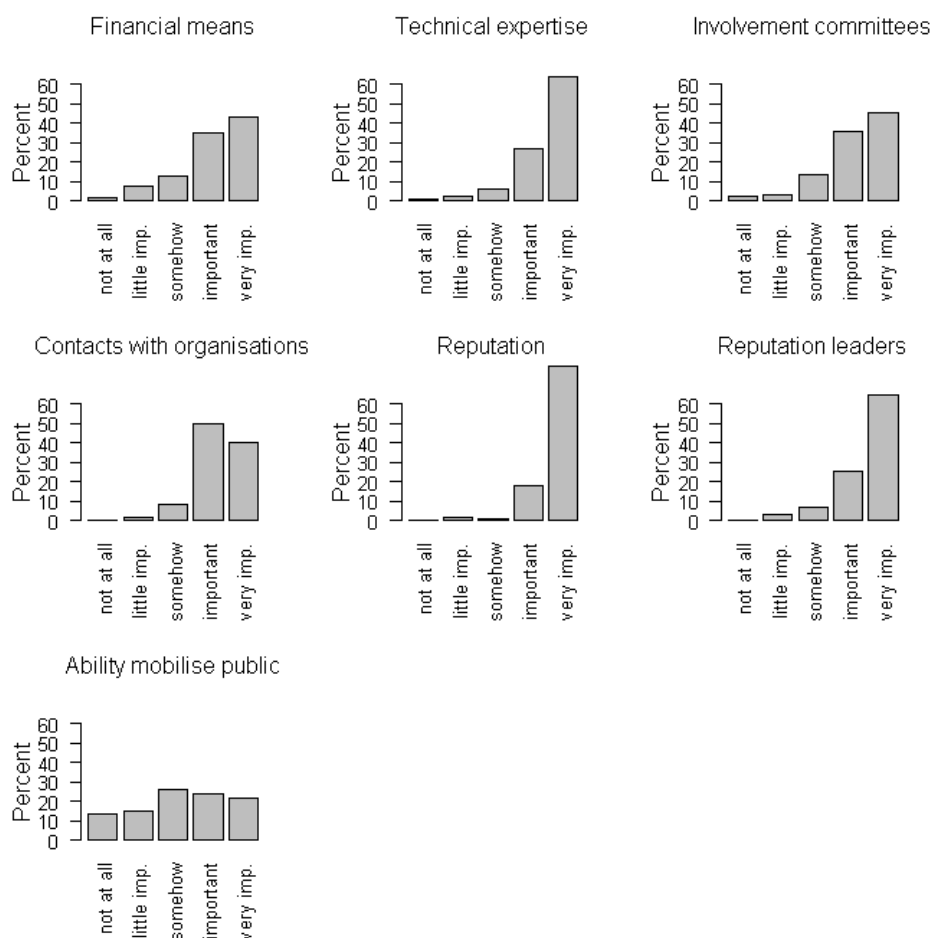
are most convinced about the usefulness of scientific expertise. Overall, the evidence suggests that NGOs consider outside strategies more effective than both business and professional associations.

7 Lobbying Resources and Cooperation

Part II of our questionnaire asked respondents a series of questions about lobbying resources and cooperation with other associations. The first question in this context concerned the importance that respondents attached to a series of resources (financial means, technical expertise ...). Figure 17 provides a summary of the responses received on this question from all associations. What is evident from this graph is that reputation and technical expertise are the resources that on average are considered most important. Financial means are also given considerable importance. The ability to mobilise the public on an issue, by contrast, is given relatively little importance. This evidence is in line with a perspective of interest group politics in Europe that gives most importance to inside lobbying in the process of interest representation.

We also look at the responses to this question for each of the three broad types of associations in our database, namely business associations, NGOs, and professional associations. For this purpose, we took the mean response for each type of association for each response category (assuming that there are equal intervals between the points of the scale used). The mean can vary between 0 (all associations of that type consider a specific resource as “not important at all”) to 4 (all associations of that type consider a specific resource as “very important”). Figure 18 presents the results. A first finding is that all resources are considered relatively important, with the exception of the ability to mobilise the public. Also interesting is that there is relatively little variation across types of groups. The only major exception to this is again the evaluation of the importance of the ability to mobilise the public, with NGOs being much more likely to respond that this is an important resource than business associations (and to a lesser

FIGURE 17: IMPORTANCE OF RESOURCES



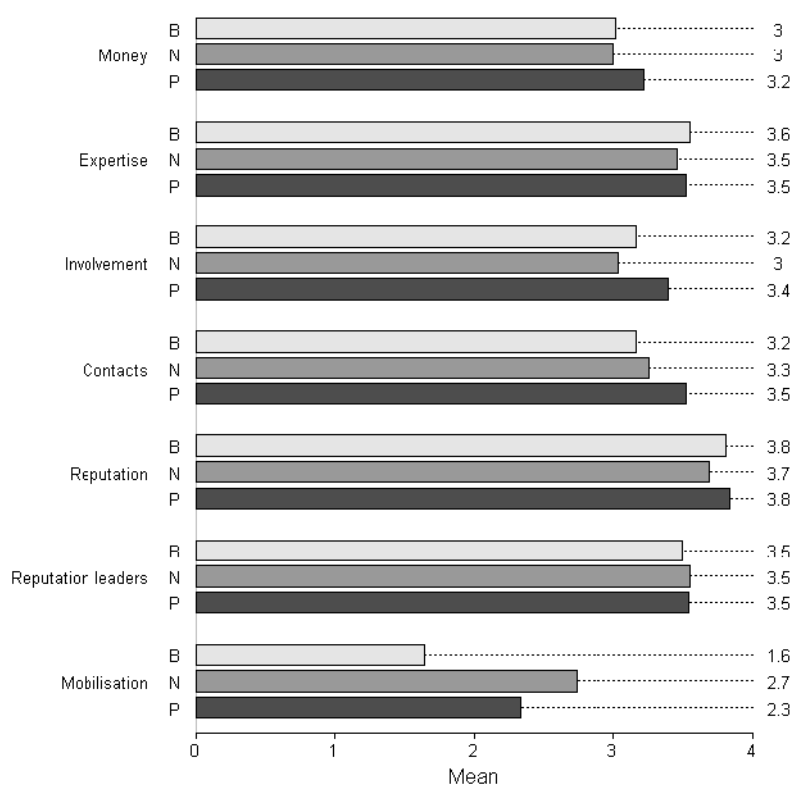
extent professional associations). In line with existing research is the finding that professional associations have a tendency to rely on contacts and involvement with committees in representing the interests of their members.

The next question concerned Irish associations' cooperation with other organisations. Respondents were asked to indicate the importance to their organisation of contacts with the following types of organisations:

- Irish trade associations
- EU-level trade associations
- Irish professional associations
- EU-level professional associations
- Irish agricultural associations
- EU-level agricultural associations
- Companies
- Irish trade unions
- EU-level trade unions
- Irish consumer, development, environmental, and social associations (NGOs)
- EU-level consumer, development, environmental, and social associations (NGOs)

We present the data in aggregate form, showing the percentage of respondents that consider contact with these associations important or very important, by type of

FIGURE 18: IMPORTANCE OF RESOURCES, BY TYPE OF ASSOCIATION



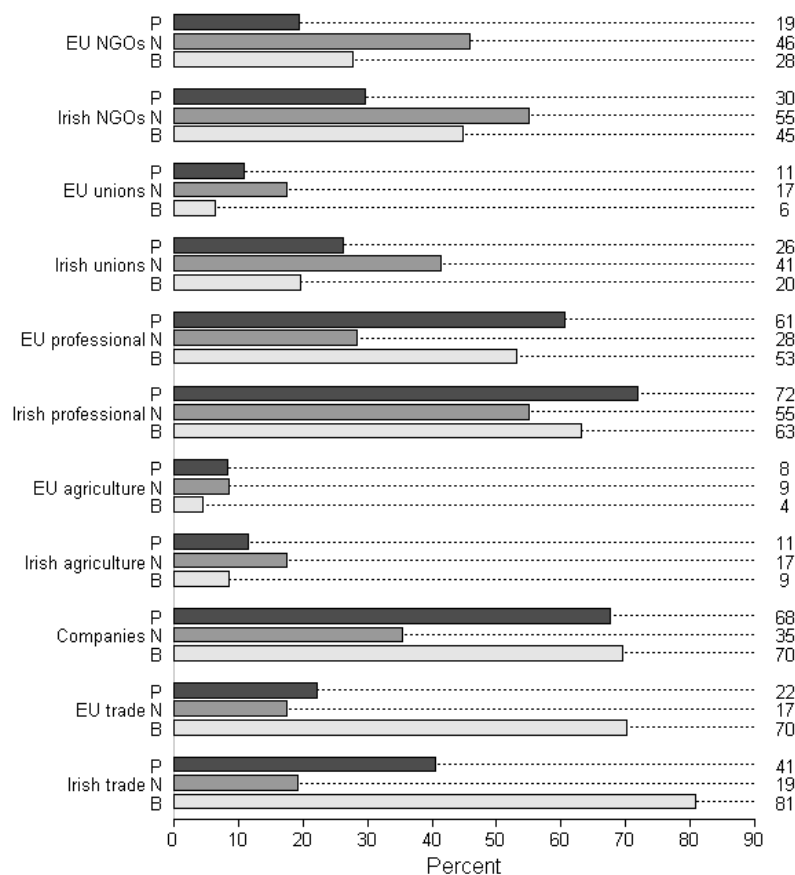
Note: B=business associations; N=NGOs; P=professional associations. The graph plots the mean responses for each tactic.

association (Figure 19). The reason for not reproducing a figure with responses for all associations is that there is major variation across types of associations, meaning that an overall graph would not be very informative.

Several findings stand out:

1. First, and not particularly astonishing, is the finding that respondents from each type consider contacts with members of the same group more important than respondents from other types (for example, business associations consider contacts with other business groups more important than NGOs or professional associations).
2. Second, for all associations, contacts with EU-level organisations are less important than contacts with Irish organisations.
3. Third, contacts with EU-level associations are still relatively important. 70 percent of business groups indicated that they had important or very important contacts with EU level trade groups. 61 percent of professional associations had important or very important contacts with EU-level professional bodies.
4. Fourth, across all three types of associations, contacts with agricultural groups are not considered very important.
5. Fifth, cooperation with companies is important or very important for basically the same percentage of professional groups as for business groups.
6. Sixth, there are also different perceptions of the importance of contacts across types of associations. For example, 45 percent of business groups consider contacts with Irish NGOs important or very important; by contrast, only 19

FIGURE 19: COOPERATION WITH OTHER ORGANISATIONS, BY TYPE OF ASSOCIATION

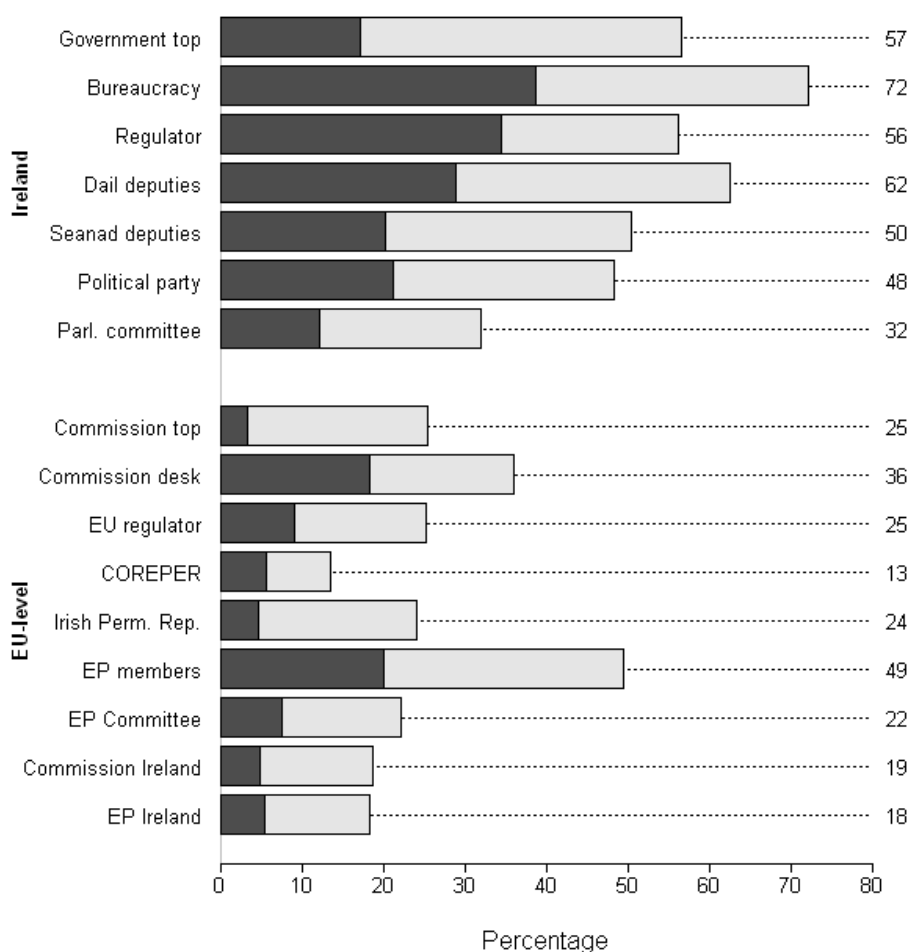


Note: the figure plots the percentage of respondents that considered contact with the various types of actors important or very important.

percent of the latter consider their contacts with the former important or very important. Similarly, NGOs tend to state that their cooperation with professional associations is important or very important for them, whereas the latter consider the same cooperation far less important.

We backed this question up with another question that required respondents to list the three associations with which they had most frequent contact. Since this question was open-ended, it is difficult to quantify. Nevertheless, the prominence of government institutions in the list of organisations mentioned is interesting. For example, there were 55 references to Government Departments (out of a total of 416 responses). Another 11 responses pointed at the Health Services Executive (HSE). By contrast, the Irish Business and Employers Confederation (IBEC) received 18 mentions. There were also 47 mentions to EU-level associations (professional bodies, trade associations, and NGOs).

FIGURE 20: FREQUENCY OF CONTACTS WITH POLITICAL INSTITUTIONS



Note: the figure plots the percentage of associations that had contact with the political institutions at least 6 times (dark bars) or at least 2 times (light bars). The numbers to the right refer to the percentage having had contact at least twice.

8 Lobbying Targets for EU Legislation

Question 12 of the questionnaire asked: “How often have you been in contact with the following *Irish* institutions with respect to *EU legislative proposals* over the last two years?” The institutions listed were:

- Top level of government (ministers etc.)
- Government bureaucracy (officials in ministries etc.)
- Irish regulatory agencies
- Deputies in the Dail
- Members of Seanad
- Political party
- Committee of the Oireachtas

Question 14, moreover, asked the same question for the following *EU-level* institutions:

- Top level of European Commission
- Desk officer (or equivalent) in the European Commission

- EU regulatory agency (e.g. CEN, EMEA, ETSI, etc.)
- National representatives in the COREPER
- Irish Permanent Representation in Brussels
- Members of the European Parliament
- European Parliament committees
- European Commission representation in Ireland
- European Parliament office in Ireland

In both cases, the response options were “never”, “once”, “2-5 times”, “6-9 times”, “10-19 times”, and “20 or more times”.

We first look at the percentage of respondents that indicated that their organisations had contact with these organisations at least twice in the last two years (at least 6 times for the dark bars), for both the Irish and the EU-level institutions (Figure 20). The resulting numbers can be interpreted as the percentage of associations that have more or less regular contact with these institutions, since those that only have one-off contacts are excluded.

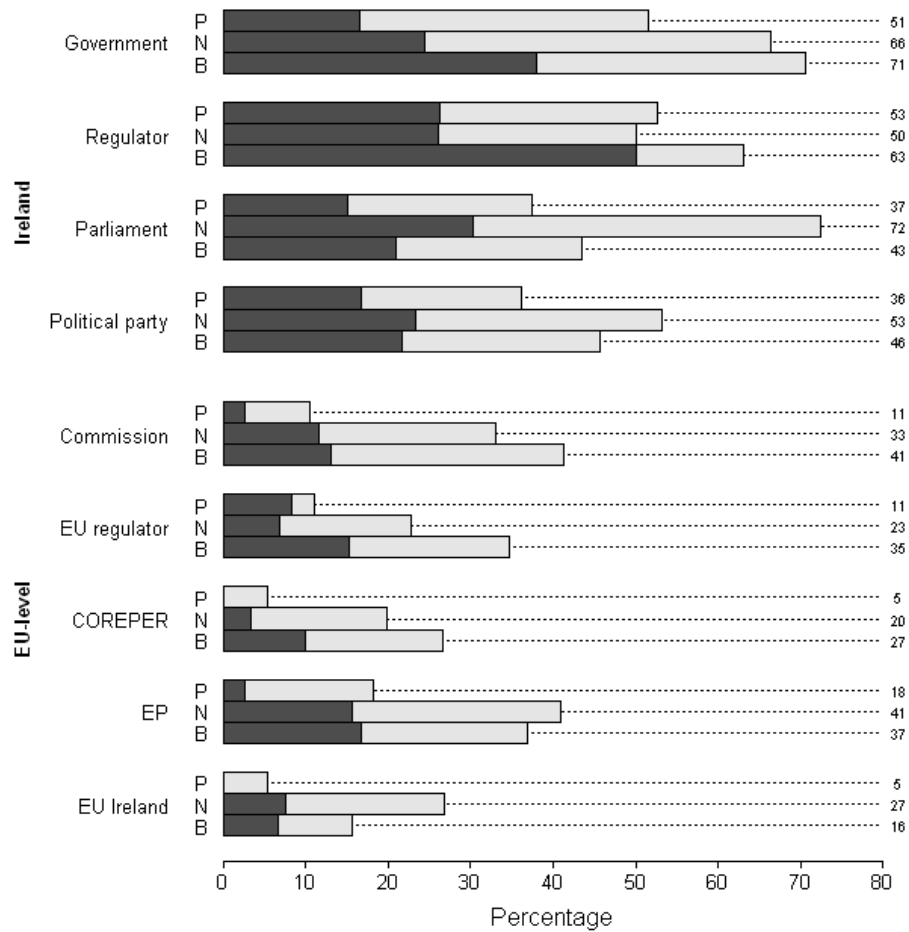
Several findings can be highlighted:

1. First, and in accordance with the evidence presented above, Irish associations have more frequent contacts with Irish political institutions/decision-makers than with EU-level political institutions/decision-makers.
2. Second, an interesting exception to this are members of the European Parliament, with which nearly half of our respondents had two or more contacts over the last two years. This is as frequent as their contacts with Irish political parties.
3. Third, Irish associations have very frequent contacts with the government bureaucracy. This is also a finding that resulted from the open-ended question on important contacts discussed above.
4. Fourth, a substantial percentage had regular contacts with the top level of Irish government. This provides an indication that access to decision-makers even at the highest level is good.
5. Fifth, with respect to the EU-level institutions, it is interesting that many more had contacts with EU institutions in Brussels than the offices of these institutions in Dublin.

It is also interesting to see whether there is any variation across types of associations (Figure 21). To simplify the figure, we combined some of the response options that we originally provided (for example, we combined the top level of government and government bureaucracy into a category “government”). Again, we plot both the percentage that had contact at least six times over the last two years (dark bars) and the percentage with contacts at least twice over the last two years (light grey bars).

An interpretation of this figure shows that business associations have more frequent contacts with the executive, both in Ireland (the government) and the EU (the European Commission) than the other types of associations. Moreover, NGOs have the most frequent contacts with legislative institutions, again at both the national and the EU level. In fact (and not shown in Figure 21), 81.3 percent of NGOs indicated that they had had at least one contact with a Member of the European Parliament in the last two years, as compared to 68.9 percent for business associations and 39.5 percent for professional associations. Furthermore, all types of associations have more

FIGURE 21: FREQUENCY OF CONTACTS, BY TYPE OF ASSOCIATION



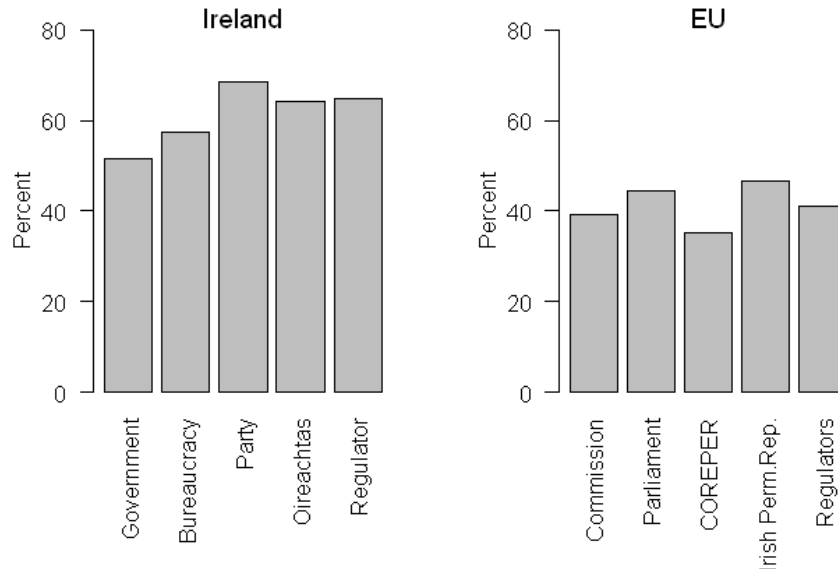
Note: see the note for Figure 20. B=business associations; N=NGOs; P=professional associations.

contacts at the national than at the EU level. Finally, this tendency is particularly pronounced for professional associations. This seems to support a hypothesis in the literature on interest groups in the EU that argues that those groups that are best connected at the national level often find it difficult to make contacts at the European level.

Of all respondents in the sample, 25 indicated that they had not had any contact with Irish institutions and 28 that they had had no contact with EU-level institutions. A total of 14 respondents indicated that they had had no contact with either the Irish or the EU-level institutions. This implies in turn that eleven associations only had contact with EU-level institutions, and 14 only with Irish institutions. At the other extreme, one institution had had contacts of more than 20 times over the last two years with all but one of the Irish institutions. One business association indicated having had similarly close contacts with the EU-level institutions.

We also asked respondents about the difficulty of accessing these institutions (questions 13 and 15). Figure 22 shows the percentage of respondents that indicated

FIGURE 22: EASE OF APPROACHING POLITICAL INSTITUTIONS



Note: the figure plots the percentage of respondents that indicated that access to these political institutions was “little difficult” or “not difficult at all”.

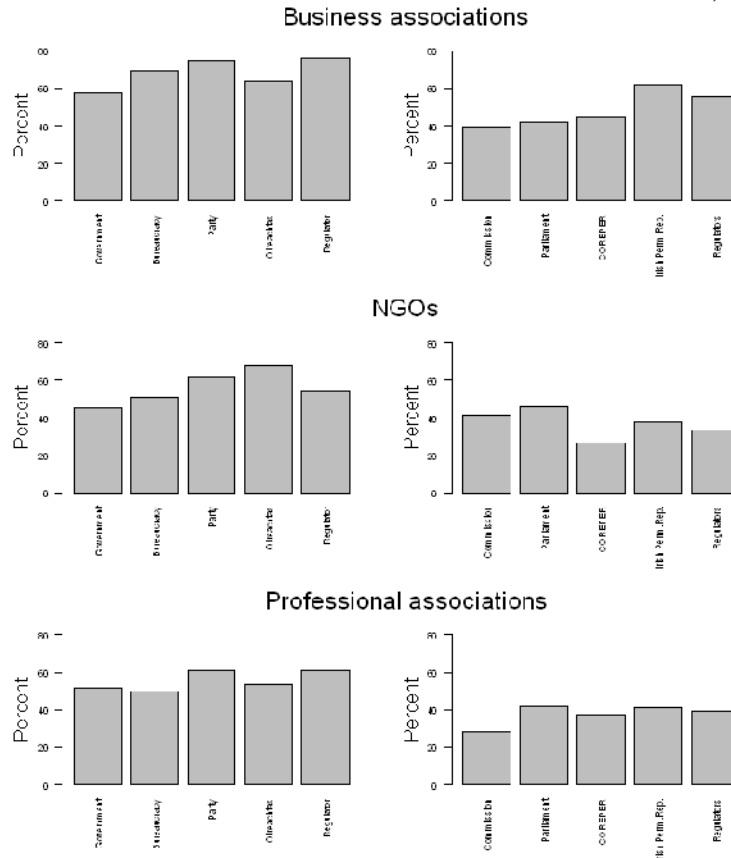
that they found contact to these institutions “little difficult” or “not difficult at all”. As could be expected, access to EU institutions is considered more difficult than access to Irish institutions. Beyond this, however, there is little variation within the two groups. It is still interesting that respondents considered access to political parties easier than access to the government (68 percent considered access to political parties little difficult or not difficult at all, as compared to 51 percent for the government); however, the frequency of contacts with political parties is lower than the frequency of contacts with government.

We also checked whether there is variation across types of associations (Figure 23). In fact, business associations find it easier to approach the Irish Permanent Representation in Brussels than other interests, while NGOs find it easiest to approach the Oireachtas. Professional associations find it very difficult to approach the European Commission, a finding that is in line with the existing literature. Justin Greenwood attributes the weakness of professional associations at the EU level to their “defensive posture” towards European integration (Greenwood 2007: 73).

9 Conclusion

We have undertaken a survey of the lobbying behaviour of Irish associations, with a focus on EU legislation. The survey has produced several interesting findings, which partly confirm existing research and partly require changes to the current scholarly understanding of national-level lobbying in the EU. One aspect of the findings that is perhaps particularly surprising is the extent of lobbying activity on EU legislation at the national level. Ignoring this activity, and only concentrating on the lobbying of EU federation and large companies with offices in Brussels may lead to substantial biases in findings. Less astonishing, but also interesting, are the differences between types of associations in terms of lobbying strategy. While in this paper we have only provided descriptive evidence, the next task is to have a closer look at the data to provide explanations for the findings.

FIGURE 23: EASE OF APPROACHING POLITICAL INSTITUTIONS, BY TYPE



Note: see the note for Figure 22.

What we are still missing in terms of data is a cross-national comparison. Are the findings presented here specific to Ireland or do they reflect well what happens in several EU member states? There is good reason to think that cross-national differences may exist – for example, because groups in countries with pluralist interest group systems find it easier to adapt to the necessities of EU lobbying. Moreover, what is the perspective of decision-makers on all of this? A survey of decision-makers on their interaction with interest groups would provide for an interesting cross-check of the present findings. The omission of firms as actors is also a shortcoming. A substantial literature hints at the strength of EU lobbying by companies (for example, McLaughlin et al. 1993; Bennett 1999). Considering companies as actors may reveal even larger differences in lobbying strategies between business interests and NGOs. Finally, the distinction between types of associations used in the present analysis is a blunt instrument in assessing the question of whether the Irish interest group system has an “upper-class accent”. To answer this question more convincingly would require more systematic data on the resources and the membership of the associations that we are studying. Despite these shortcomings, we remain convinced that the present study provides an interesting addition to the existing literature on lobbying in the EU.

10 References

- Bennett, R.J. (1999) 'Business Routes of Influence in Brussels: Exploring the Choice of Direct Representation', *Political Studies* 47(2): 240-57.
- Coen, D. (2009) 'Business Lobbying in the EU', in D. Coen and J. Richardson (eds), *Lobbying the European Union: Institutions, Actors, and Issues*, Oxford: Oxford University Press.
- Eising, R. (2008) *The Political Economy of State-Business Relations in Europe: Modes of Interest Intermediation, Varieties of Capitalism, and the Access to EU Policy-making*, London: Routledge.
- European Union (2008) 'Annual Report 2008', Brussels: European Union.
- Greenwood, J. (2007) *Interest Representation in the European Union*, Houndmills: Palgrave.
- Greer, S.L., da Fonseca, E.M. and Adolph, C. (2008) 'Mobilizing Bias in Europe: Lobbies, Democracy and EU Health Policy-Making', *European Union Politics* 9(3): 403-433,
- Kollman, K. (1998) *Outside Lobbying: Public Opinion and Interest Group Strategies*, Princeton: Princeton University Press.
- König, T., Luetgert, B. and Dannwolf, T. (2006) 'Quantifying European Legislative Research', *European Union Politics* 7(4): 555-76.
- Lindberg, L. (1963) *The Political Dynamics of European Economic Integration*, Stanford: Stanford University Press.
- McLaughlin, A.M., Jordan, G. and Maloney, W. (1993) 'Corporate Lobbying in the European Community', *Journal of Common Market Studies* 31(2): 191-212.
- Schattschneider, E.E. (1960) *The Semisovereign People*, New York: Holt, Rinehart, and Winston.
- Slob, A and Smakman, F. (2006) 'Evaluation of the Civil Society Dialogue at DG Trade: Assessment of Relevance, Effectiveness and Efficiency of CSD Policy and Procedures. Draft'. Rotterdam: Ecorys. Available at: http://trade.ec.europa.eu/doclib/docs/2006/october/tradoc_130551.pdf.

Appendix I: Some Reflections on the Practical Aspects of Carrying out a Survey

Our experience lets us conclude that online surveys have the following strengths and weaknesses. With respect to strengths, online surveys allows researchers to save both on the costs of sending letters and on the time entering data. If carried out appropriately, an online survey should also produce a reasonable response rate. Nevertheless, and this is a weakness, the response rate will not be high enough to substitute for the sending of hardcopies. Moreover, in an online survey respondents often do not answer all questions, unless they are forced to do so by not allowing him/her to proceed to the next question before a previous one is answered. Such a tactic, however, may have the unintended consequence of making respondents abandon their effort of responding. Finally, online surveys come with the practical difficulty of identifying appropriate e-mail addresses.

The specific strengths and weaknesses of LimeSurvey as compared to other online survey software (such as SurveyMonkey or questionpro.com), are first that it is a very flexible and highly customizable tool, with many question formats and templates (which in turn can be changed). Moreover, and this cannot be neglected in the academic realm, the use of LimeSurvey is free. Since researchers relying on LimeSurvey only need access to a web server, its use is relatively cheap overall as compared to most alternatives. One of its main strengths is that it allows users to send bulk emails and schedule automatic e-mails (including response e-mail once the survey is completed). Furthermore, there are no restrictions with respect to the number of questions or respondents. Still another advantage is that it allows for both anonymous and non-anonymous surveys. Finally, it includes a feature that allows for easy entry of data from questionnaires received as hardcopy.

The only real disadvantage is that LimeSurvey requires some effort in setting up, the drawback of the flexibility stressed above. We even decided to develop our own template, as the existing templates did not satisfy us. Overall, we invested close to a month in setting up the survey, which compares to a day or so that it may have taken us to have a survey running on a platform such as SurveyMonkey. Nevertheless, we considered this work worth the effort to ensure a professional look for the survey and thus to trigger a high response rate.

LimeSurvey can only be used on servers that provide for MySQL and PHP. An alternative way of using LimeSurvey is through LimeService (<http://www.limeservice.com/>), a platform that has LimeSurvey preinstalled. For testing purposes, LimeSurvey can also be installed on a local computer, for example through XAMPP, a software that installs an Apache web server.

Overall, the combination of LimeSurvey and a hardcopy to those that did not respond to the e-mails has proved to be a good strategy. It was also the only feasible strategy, meaning that anyone opting for an online survey should not think that he/she will get around incurring some costs in also sending hardcopies. This process was made easier by the fact that LimeSurvey has a feature that allows users to download the survey as a single html file. This file can then be adapted to produce a version that is suitable for printing and distributing (eliminating backgrounds etc.).