

Talking for the people or over people's heads?

Access and issue congruence among citizens, interest groups and the European Commission¹

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Abstract. Do interest organizations and European Commission (EC) officials exchange information and ideas about issues that are important to the general public? This paper examines whether the access EC-officials supply to interest organizations functions as a transmission belt for general citizen interests. Pluralists would argue that organized interests are able to act as transmission belts between policymakers and the citizenry, while their critics have pointed to a structural bias in interest group mobilization, access and, possibly, influence. Yet, it is not clear whether interest group mobilization and the way the Commission interacts with organized interests alleviates or reinforces structural bias in EU interest representation. This paper examines the congruence between the EC's policy priorities, organized interests and the general public, we seek to contribute to the debate concerning bias in EU interest representation and the role of the Commission therein. For this purpose we combine various data sources, namely public opinion data on citizen preferences, observational data on access (more precisely the meetings of Commission DG and cabinet officials with organized interests) and evidence from a survey among European organized interests. Combining these data sources allows us to compare the public's attention for a substantial set of policy areas with the extent to which the EC facilitates access to organized interests that are active in these areas and the amount of advocacy efforts.

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Introduction

Lobbying is a contentious affair and the source of considerable public debate. The involvement of organized interests in public policy is often contested and raises concerns about the integrity of the policymaking process. Journalists report on the influence of a lobbying industry, refer to unethical political practices of policymakers who are captured by specific interests and, more crucially, the possibility that the mobilization of organized interests distorts the representation of the public interest. Part of the current discontent with politics is related to the alleged impact of organized interests. The recent rhetoric of some populist politicians claims that decent political systems would be better off without lobbying and evoke organized interest representation as something harmful.

This issue is especially topical when it comes to the European Union (EU). Brussels is home to a huge and diverse population of organized interests and the EU institutions actively seek to reach out to a European civil society. Yet, the role of these organized interests is looked upon with considerable suspicion. It is argued that the EU is dominated by big business and specialized interests, while public and citizen interests are much less well represented. Although research on this matter consistently demonstrates that business interests are mobilized in much higher numbers, the jury is still out as to whether interest group involvement in EU public policymaking is systematically biased in favor of business interests, and if so, how to explain it. On the other hand, despite the concerns about the involvement of organized interests in public policymaking, it is hard to imagine how a political system such as the EU, would function without the involvement of some form of stakeholder representation. In many instances, European institutions actively seek the expertise and support from organized interests and some EU-level organized interests, often citizen groups, were established with the support of the European institutions.

To address the question of interest representation bias, this paper aims to shed some light on the extent to which the involvement of organized interests in public policymaking may or may not reflect broader public concerns. Our analysis consists of three interrelated building blocks. First, we analyze the extent to which organized interests gained access to the European Commission (EC) to exchange ideas and information on specific policy topics. In contrast to previous studies that assessed access through surveys (with organized interests or policymakers), we rely on a more objective measure of access, namely the ECs publication of meetings with various societal stakeholders. Second, we assess the “advocacy energy”, or the extent to which various societal interests actively sought access to the European Commission and we ask whether or not all these attempts to seek access resulted in effective access. For this

part of the analysis, we rely on an extensive survey among EU interest organizations. Third, we contrast these insights with evidence on the salience various issues enjoy among the broader public. For 21 policy areas, we use public opinion data on the most important problem (MIP) to identify which issues are considered as most pressing and important. This enables us to analyze the extent to which attention for different issues among the public corresponds with attention for the same issues among policy advocates that seek access to the EC and among EC policymakers who supply access to them.

By developing an integrated analysis of these three components, we aim to contribute to and bridge three separate literatures. First, during the past ten years a substantial research program has been developed on policy congruence and responsiveness. Essentially, this literature covers the extent to which concerns held by citizens are effectively taken into account by policymakers, or the extent to which public policy reflects citizen interests. In other words, the aim of this research is to analyze whether the public effectively matters for policymaking. Second, recently interest group scholars started to make inroads into this literature, arguing that many policy processes are subject to substantial lobbying attempts by private interests and that policy responsiveness studies need to account for the role of organized interests. Finally, there is nowadays a considerable literature on advocacy and lobbying. Much progress has been made in developing and refining existing concepts, as well as measurement and empirical analysis. This paper contributes to this literature by developing and analyzing a new and, in our view, less subjective measure of access that also captures the policy topics on which interest organizations exchange information with EC officials.

The next section offers a more in-depth reflection on the relationship between the three building blocks mentioned earlier. Based on this, the second section elaborates on why policy congruence is an important issue when it comes to the EU. We explore different arguments for why the EU should demonstrate a high or a low level of convergence between public preferences, interest group policy priorities and topics discussed with policymakers. This is followed by a section outlining our research design. The empirical section provides a first explorative analysis of our data and adds as preliminary conclusion that there is a considerable congruence between the agenda of organized interests and the EC, but a low congruence of these two agenda's with public opinion.

Linking the actors of policy congruence

The hypothesis that public opinion has an impact on public policy has been systematically corroborated by various empirical studies (Burstein, 2003; Hagemann et al.,

2016; Hobolt and Klemmensen, 2008; Soroka and Wlezien, 2010). For instance, the “thermostatic model” seems to provide a good explanation of how policymakers’ decisions reflects public opinion and how the public reacts to policy decisions (Wlezien and Soroka, 2012). According to this model, as public opinion about a certain issue in the society changes, policymakers will react to this change by enacting more policies in that area. After sufficient change in policy takes place, the public opinion no longer supports further action on that issue and attention shifts to other topics.

However, according to this model, it is unclear whether interest intermediation – the organizational structures that operate as a transmission belt between citizens and policymakers – plays some role in this process. The issues that the citizens consider important (public agenda), those that interest groups get involved in (interest group agenda) and the issues that are addressed in EC policy discussions (EC agenda) may or may not overlap. By policy congruence we understand the correlation between these different agendas, much the same way Jones and Baumgartner investigate the agenda congruence of US citizens and Congress (Jones and Baumgartner, 2005). Furthermore, there is now an emerging literature that examines the extent to which the policy priorities identified by the public are reflected by the interest group agenda (e.g. Kimball et al., 2012). More specifically, some of that literature seeks to understand how interest group mobilization reflects public attention to different policy areas. For example, if public opinion surveys display an increased attention among citizens to immigration issues, the expectation is that advocacy on such issues increases. The empirical testing of this hypothesis has been surprisingly scarce, despite the obvious implications for theories of interest representation and democracy. There is, nonetheless, some evidence that EU interest organizations mobilize for policy consultations at higher rates on topics considered important by the general public (Rasmussen et al., 2014).

While the link between public opinion and policy often disregards the role of intermediate actors in the representation process, the impact of public opinion on the interest group agenda only partly describes the transmission belt argument. Showing that the advocacy efforts of interest organizations reflect public opinion should be followed by an account of whether and to what extent citizen concerns are also addressed in the interactions between interest organizations and policymakers. Ultimately, the role of organized interests as transmission belt of societal interests is unclear if those groups that mobilize to represent the public – i.e. whose policy agenda is most congruent with the public agenda – do not gain access to or attention from policymakers, while those who mobilize on issues that are not of major concern to most citizens gain plenty of access. Access and issue congruence between interest

groups and policymakers are, therefore, part of the more complex framework in which public preferences are translated into public policy.

Our aim is to connect the approaches described above by developing a framework involving three building blocks of policy congruence – citizens, interest groups and policymakers – connected by the amount of attention each of these different actors give to various policy topics. In a first step, we connect citizens and interest groups by looking at which policy topics they consider as being the most important. We then take this link further and connect interest group policy priorities to the agenda of their discussions with EC officials. That way, we examine whether interest organizations actually play some role in linking the general public interest with the EC's policy agenda.

Policy congruence in the European Union

In this section we develop two ideas on how we can understand varying levels of policy congruence in the EU. This concerns the extent to which the issue prioritization of the general public is picked up by policy advocates – among whom quite a number label themselves as citizen interests and claim to represent the general public – and policymakers. More precisely, we aim to clarify whether or not the topics on which organized interests and policymakers exchange information reflect broader public concerns. First, although a argument can be made in favor of a low level of policy congruence, there are also good reasons to expect some policy congruence. Arguments in favor of both expectations will be developed more in detail. Second, we argue that it might be problematic to talk about *the* citizens, *the* interest group system or *the* policymakers in very general terms. Instead, the public consists of different segments that might be represented by different sections of the interest group system or policymakers.

There are good reasons to expect a low level of policy congruence in the EU. The EU is a complex multilevel system characterized by a high level of institutional friction (Chaqués Bonafont and Palau, 2011). Institutional friction refers to the transaction costs involved in public policymaking, more concretely the number of collective actors whose agreement is needed for decision making. Systems with high levels of institutional friction are less flexible in responding to sudden challenges or changes in public opinion. One of the reasons is that the involvement of many governmental actors obscures who is doing what and constrains the ability of citizens to inform themselves. In systems characterized by high levels of institutional friction it is, therefore, much more difficult to attribute policy responsibilities (by citizens), which reduces the electoral cost for policy inactivity (among policymakers). In other words, policymakers are more difficult to hold accountable for not acting on public demands. It is

especially in areas with overlapping competencies that congruence should be low (Soroka and Wlezien, 2010). In addition, Europe's key central executive of the EU – the European Commission – is not directly elected and, therefore, may show a lower propensity to pay attention to public opinion (Hobolt and Klemmensen, 2008). Given the expected low level of congruence, the mobilization of societal interests is most likely to be a response to agenda-setting initiated by policymaking elites (and not a response to some broader public concerns).

In contrast to this view, one might argue that EU institutions – including the EC – can be expected to take into account public sentiments when designing policies. Some empirical studies confirm this hypothesis (Alexandrova et al., 2016; Toshkov, 2011). To begin with, most EU regulations need approval from the European Parliament and the Council, two bodies that consist of elected politicians. In addition to this, the implementation of many EU rules depends on approval by national parliaments. As the EC cannot afford systematic non-decisions or bad implementation, it faces some incentives to consider policy issues to which the public pays much attention. Also, recent evidence shows that European politics has some influence on electoral politics in the member-states and various scholars have demonstrated an increased politicization of European politics among the public in many member states (e.g. Hutter and Grande, 2014; Rauh, 2016). One aspect of politicization are the growing numbers of societal interests that mobilize at the European level. Although business still dominates the EU interest group population, it is clear that the set of European organized interests is highly diverse, enabling it to represent a wide array of citizen interests. For instance, Rasmussen et al. (2014) demonstrate that organized interests are more active in areas the public cares most strongly about. One of the reasons mentioned in much of this research, is that a dense and diverse interest group systems relies on sustained support from members and constituencies in order to ensure organizational survival. Groups may decide to mobilize on issues that generate broad public attention as this enables them to attract attention from members as well as policymakers. If this is correct, then mobilized interest act as a transmission belt between the public and policymakers.

Although one could resort to a simplified framework of issue congruence among political actors, it might be inaccurate, especially in the case of a composite polity such as the EU, to talk about the citizens, the interest group system or policymakers in very general terms. That implies that expectations about overall low levels of congruence are relevant, but could also be incomplete and problematic. Interest groups or policymakers do not necessarily respond to some general public interests, but might often do so in relation to a particular segment of the public, a specific electoral or territorial constituency (Gilens, 2005; Page et al., 2013). In

addition to this, policymakers can only be responsive in policy areas where they have policymaking competencies. Developing policies and regulations in areas where the EU institutions have few legal competence or responsibilities (and where other jurisdictions are competent), could even be considered as a some sort of inappropriate form of congruence as this might violate the autonomy of the member-state governments. Instead, showing some restraint in these areas might be interpreted as a form of responsiveness.

Therefore, we propose to disaggregate public attention, advocacy and access into some meaningful segments for which we might expect varying levels of congruence. It implies, in terms of operationalization, that we develop measures for different interest group types and confront these with public opinion data for different segments of the public. We list three ways to segment these general categories.

First, one might argue that there is no such thing as one overarching EU interest group community. One might think that the issues prioritization of business interests is less in line with public opinion compared to the prioritization of non-business interests. As Dür et al. note, there is some incongruence between European public opinion, that has a general preference for more regulation and a negative view of business, and business which favors deregulation (Dür et al., 2015). The low correspondence between the overall public and EU-level advocacy as well as access, is then largely due to the greater number of business interests that mobilize at the European level. In contrast, non-business interests – NGOs, diffuse interests, civil society – may show, compared to business, a higher level of congruence with public opinion, which might be reflected in their advocacy efforts as well in their interactions with EU policymakers. As a counter-argument, one could reason that business interests are also attentive to publicly salient issues. As an increasing number of non-business interests seeks to influence EU public policy, business interests may respond to this (by counteractive lobbying or in collaboration with non-business interests) and pay increasingly attention to publicly salient issues.

Second, organized interests differ substantially in terms of their organizational outlook and their preferred advocacy strategies. Some groups depend for their organizational maintenance on a broad based individual membership while others bring together a rather small number of corporate actors. Groups may also favor some particular advocacy strategies whereby some specialize more in outside and others more in inside lobbying (Beyers, 2004; Dür and Mateo, 2013; Hanegraaff et al., 2016). Both a dependence on a substantial individual membership and a propensity to specialize in outside lobbying make groups more likely to be active on publicly salient issues. These groups should show a higher level of policy congruence with the public. In contrast, those without an individual membership and those who specialize

in inside lobbying are much less in need to pay attention to public opinion. Following a logic of resource exchange for access, these groups should be more likely to closely follow the EC's policy agenda and be more active on the same issues as the EU executive.

Third, another view is that the general public does not exist, but that it consists of different segments that each adopt a different issue prioritization. For instance, highly educated middle class citizens might have a prioritization that is relatively well reflected by NGOs and civil society interests. Or, very affluent citizens or voters for economically right-wing parties have a prioritization that corresponds with business interest. With respect to the EU it is relevant to consider its territorial composition and how this is reflected in the EU system of interest representation. Public opinion in Europe consist largely of different national publics, each potentially demonstrating varying levels of issue prioritization. As most organized interest mobilized in Europe originate from North-Western Europe (and not from the South or the East), we can imagine that the prioritization of EU-level interest groups – as well as the substance of their conversations with policymakers - is mostly congruent with the prioritization among the public in North-Western Europe (Berkhout et al., 2017).

Research design

We combine three different sources of data to assess how citizens, interest groups and public officials prioritize particular policy topics. First, to determine how important specific policy topics are to EU member state citizens, we use available public opinion surveys. Second, we employ a survey of EU interest groups that measures the “energy” with which they get involved in lobbying on these same topics. The third data source records detailed observations of direct meetings between interest groups and senior EC officials on various policy topics. In what follows, we describe these data sources in more detail and provide an account of how we combine them. Before that, an important clarification is perhaps necessary. To reliably establish a connection between the priorities of these different actors, we carefully considered the timing of the surveys as well as the interaction between interest groups and European policymakers. The public opinion survey we rely on was carried out between May-June 2014, the interest group survey data was collected between March-July 2015, while the access of groups to EC officials was recorded between November 2014 and December 2015. Thus, an appropriate time lag is present such that interest groups and public officials could be aware of the priorities expressed by the citizens.

We use the European Elections Study (EES) survey to measure the priorities of the public (Schmitt et al., 2016). The survey was conducted in all 28 member states and contains

useful information on the political attitudes and priorities of EU citizens. More specifically, we select the question on the first most important issue or problem facing the country of the respondent at the moment of the survey.² Respondents were able to provide an open answer to this question, which was then coded by the EES survey team into one of 148 policy area categories (see, Popa et al., 2015). In order to facilitate the comparison of the priorities mentioned by the public with those held by interest groups and the EC, we further recoded these categories into 21 policy areas used in the INTEREURO project. Overall, the most important problems identified by EU citizens in the EES survey were in the following policy areas (in descending order): employment, economic and monetary policy, social policy, migration policy, fight against crime. These five areas accounted for more than 80 percent of most important issues mentioned by the respondents. In addition to the detailed information concerning the most important policy problem for EU citizens, the advantage of the EES survey is that it also includes additional items that allow us to observe issue priorities among different subsets of respondents. These additional items include information about their socio-economic status, which we use in order to examine whether different publics prioritize policy problems in different ways.

To measure the policy prioritization of EU level interest groups we make use of a large survey conducted among EU-level interest associations within the framework of the larger INTEREURO-project (Maloney et al., 2016). The sample includes 2,038 EU-level interest associations which were selected from a sampling frame of firms listed in the Transparency Register of the European Union, the OECKL Directory, and lists of EU-level associations created during previous research projects. One important aspect is that the sample focuses mostly on groups that are collective, which means that they rely on some membership, supporter or constituency support. Supporters or members could include individuals, firms or other legal persons. Excluded are corporate entities such as individual firms, consultancies, think tanks, or institutions. This implies that all sampled organizational entities offer clear opportunities to citizens political engagement.

Contact details were collected for each of these organizations from the aforementioned registries and organizations' websites as well as through phone and email contacts. The

² Survey participants were asked two questions: one about the first most important problem and one about the second most important problem facing their country. We use the question on the first most important problem. The question wording was: "What do you think is the first most important issue or problem facing [country] at the moment?"

questionnaire was in the field from 9 March until 2 July 2015. It took an average of 26 minutes to fill in the survey. The response rate is on average 36%, which is very good taking into account similar surveys (Marchetti, 2015). The online survey has been designed to obtain data on groups' organizational structures and strategies, sectoral and organizational activities degree of professionalization, institutionalization and bureaucratization, level and sources of funding, the amount of information at a group's disposal, salience of specific issues and policy fields to the group, policy preferences political contacts and networks, and lobbying activities used to influence outcomes. In addition, the survey collects organizational demographics (i.e. year founded, size, structure, members' activity levels, staffing levels, and budgets) as well as some socio-demographic data on group leaders.

One key question for the analyses in this paper probed in the policy areas in which interest groups were actively involved. Respondents were presented 21 policy areas and were asked 'Which areas is your organization involved in?'. As a follow-up we asked for those areas where there was some involvement 'How involved is your organization in these areas?' In short, for 21 policy areas we have a measure of involvement ('no' or 'yes') and the intensity of involvement ('somewhat' or 'strong'). The five most frequent policy areas that interest groups are involved in are, respectively, environmental policy, the Single Market, education, health policy and social policy.

The third data set we use records information about the meetings that took place between interest groups and senior EC policymakers. At the beginning of its mandate, the EC under the leadership of Jean-Claude Juncker passed two decisions aimed at increasing the transparency of its interaction with interest organizations. The two decisions require Commissioners, their cabinet members and Directors-General to publish the meetings they have with organizations that carry out lobbying activities on the European Union decisions (European Commission, 2014a, 2014b).³ Since November, 2014, these senior EC officials publish the meetings they

³ It is important to note that the EC decisions do not specify sanctions against officials in case of non-compliance. Thus, we cannot exclude the possibility that some meetings are left out. However, even if that might occur, there are no reasons to believe that this would be systematic or that our observations are biased. First, there is quite some oversight that EU-specialized media outlets, such as Politico, and some NGOs, such as Transparency International, exercise on these meetings. Undisclosed or secret encounters are likely to trigger unwanted scandals and further damage the public legitimacy of the EC. Second, what we actually see is that many meetings with actors that could have previously been considered "sensitive", such as representatives of business interests, are the ones most frequently reported. We see no reason why officials would systematically publish meetings with these actors or

have with interest organizations on the EC website. The disclosed information includes the name of the policymaker, the organization that policymakers have met, the date of the meeting, and the subject of their discussion. We collected all the available data on these meetings and coded the subject of the discussions into the 21 policy area categories of the INTEREURO project. For the time period we consider in this study, there were a total of 7668 meetings between 2234 interest organizations and 262 EC officials. The five most frequent policy areas addressed in these meetings were economic and monetary policy, the Single Market, energy policy, environmental policy and scientific research policy. Somewhat surprisingly, the last category figures prominently on the political agenda of the Commission due to a high attention to issues related to the Digital Agenda and the Digital Single Market (e.g. the transition to 5G communication networks, Horizon 2020 projects or the development of self-driving cars).

The main advantage of using data on meetings is that in addition to proposals that are already under debate, we can also capture the EC's policymaking intentions before a specific legislative proposal is launched. More specifically, the discussion topics in these meetings offer an overview of the policy areas in which the EC might act following direct interactions with interest organizations. The meetings, therefore, provide an ideal moment for interest groups to promote their goals. Legislative initiatives, speeches delivered by policymakers or other policy documents may also offer information about the policy agenda. However, they are not directly related to interest group activities and may also reflect the input of other political actors or may be the result of exogenous events. Furthermore, some previous research has emphasized the relevance of *rhetorical responsiveness*, understood as the policy issues that the government may discuss rather than those issues on which the government legislates (Alexandrova et al., 2016, p. 610; Hobolt and Klemmensen, 2008, p. 310).

From these three sources we developed measures for 21 policy areas. For each area, we calculate the relative percent of attention it receives from citizens, interest groups and the topics of the meetings published by EC policymakers, respectively. However, we do not necessarily expect that all citizens or all interest groups have the same policy priorities. Respondents of different socio-economic backgrounds may have different opinions about the most important problem facing their country. Some might emphasize economic issues, while others might consider security issues more problematic. Thus, we calculate separate indicators of attention among respondents of different socio-economic status (SES) by relying on a question that

hide meetings with others. In fact, this is in line with studies on interest group access that observe a higher level of business inside lobbying, compared to other types of interests.

records the self-perceived class membership of the respondent.⁴ This way we can test the expectation that the interest group or EC agenda corresponds with distinct segments of the society. Furthermore, the policy priorities of interest organizations that specialize in inside strategies and might be different from those that focus on outside lobbying. Making a distinction between insiders and outsiders, recent findings also indicate that business organizations are more likely to enjoy access to the EU executive than non-business groups (Dür and Mateo, 2016). We therefore calculate separate percentages for business and non-business groups, as well as those that use inside strategies and those that use outside strategies.

Data analysis

We first present overall results, comparing the amount of attention given to different policy areas by citizens, interest groups and EC officials in their meetings with interest groups.

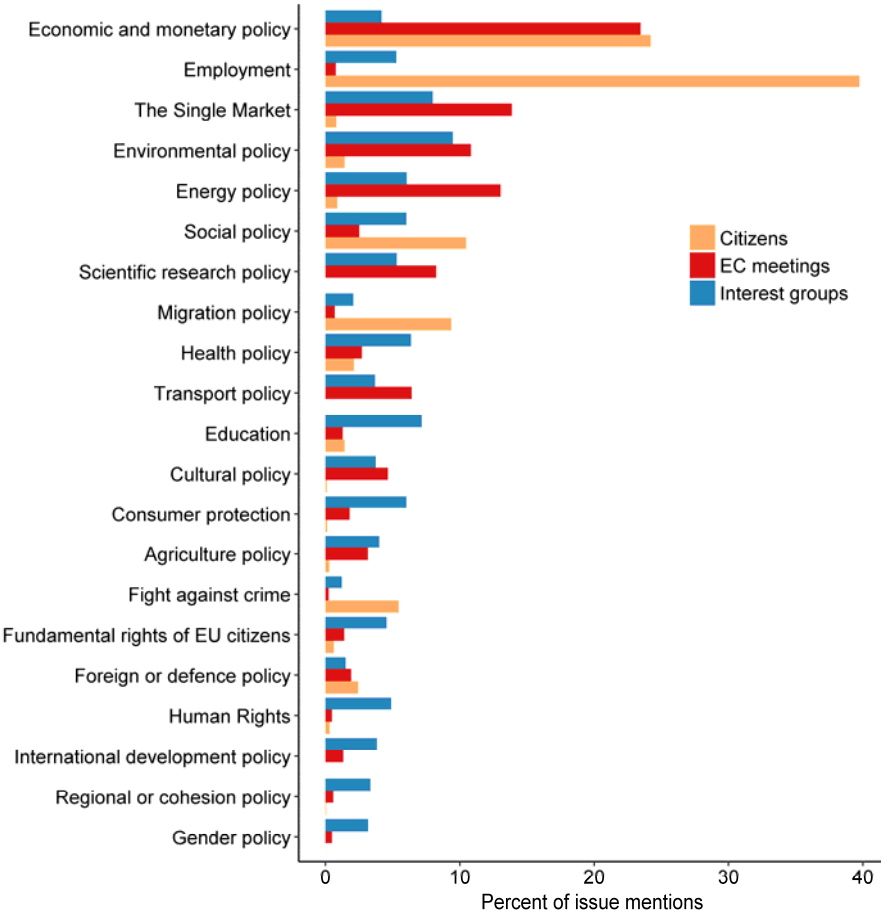


Figure 1. The interest group, public and EC agendas

⁴ The wording of the question was: “Do you see yourself and your household belonging to...”. The answer options were: “The working class of society”, “The middle class of society” and “The higher class of society”.

Figure 1 shows the distribution of policy issues mentioned as the most important problem in the EES survey (percentage of the EU population), the issues on which interest groups get involved, as mentioned in the INTEREURO survey (percentage of groups mobilizing on these issues) and the issues addressed in EC meetings with interest groups (percentage of meetings on these issues). As the figure shows, the priorities of the public, interest groups and EC policymakers differ in many areas. Among the public there is a particularly strong focus on employment policy, economic and monetary issues, social policy and migration (while these areas gain less attention from organized interests). These are the main areas in which EU citizens identified the most important problems facing their countries in 2014. On the other hand, the policy areas in which interest groups get involved are quite different, with the environment, the Single Market, education and health policy being their top priorities. In the meetings between interest groups and EC senior officials the most frequently addressed topics are related to economic and monetary issues, the Single Market, energy policy and environmental policy.

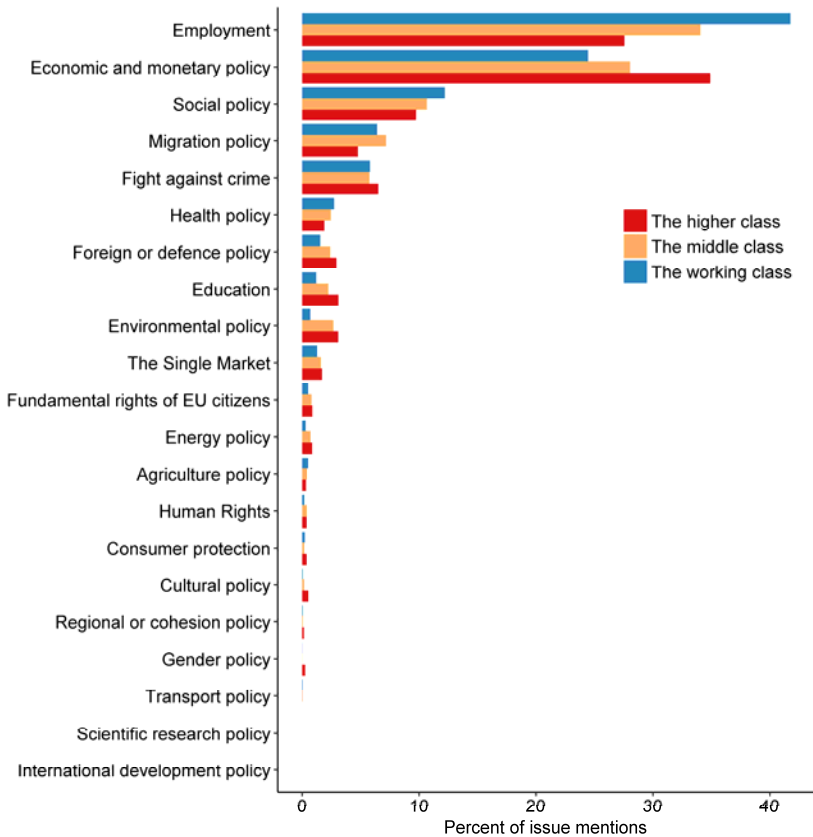


Figure 2. MIP among different social categories

The priorities of the public in terms of economic and monetary policy resemble those addressed in the meetings between EC officials and interest groups. However, this similarity is more likely to be explained by the extensive competencies of the EC in this domain, rather than by some kind of responsiveness to public priorities. In fact, this is the only policy area where public priorities seem to be closer to those addressed in the EC meetings. In all other domains, the public agenda seems to be disconnected from both the interest group and the EC agendas.

To illustrate in more detail the relationship between these agendas we first look at the congruence between the priorities of citizens with different SES and different types of interest groups. Because the EES survey does not include information about the income levels of EU citizens, we rely on the question tapping the self-perceived class membership of the respondents. Survey participants could indicate that they either belong to the working class, the middle class or the higher class of the society.

Figure 2 compares the policy priorities of these different groups of European citizens. In line with some previous results concerning policy prioritization among different social categories in the US (Kimball et al., 2012), we observe few differences between the priorities of higher class and lower class respondents. The two policy areas where some substantial differences are observed are employment and economic and monetary issues. Respondents who identify as working class are more concerned about employment than middle or higher class respondents, while those with a higher social status express slightly more concerns about economic and monetary issues, which is expected and, again, similar to previous studies. Therefore, it is not very surprising that the correlations between the priorities of citizens with different SES and the interest group agenda are rather similar.⁵ Yet, the policy priorities of the interest group community taken together seem to be dissociated from those expressed by different groups of citizens. We find a correlation of 0.13 for those identifying as working class, 0.17 for the middle class and 0.16 for the higher class group.

To further examine the relationship between the interest group and the public agenda, we turn to the analysis of the policy options of different types of interest groups and citizens. As mentioned before, the interest group community overall might not accurately represent citizen priorities, but different types of interest organizations might be more responsive to the EU public opinion. Our expectation was that the policy priorities expressed by interest groups who focus more on outside tactics and represent non-business interests could display a stronger

⁵ We use Spearman rank-order correlations to characterize the associations between different agendas as we do not assume a linear relationship between our measures.

congruence with the public agenda, compared to groups pursuing inside strategies or representing business interests.

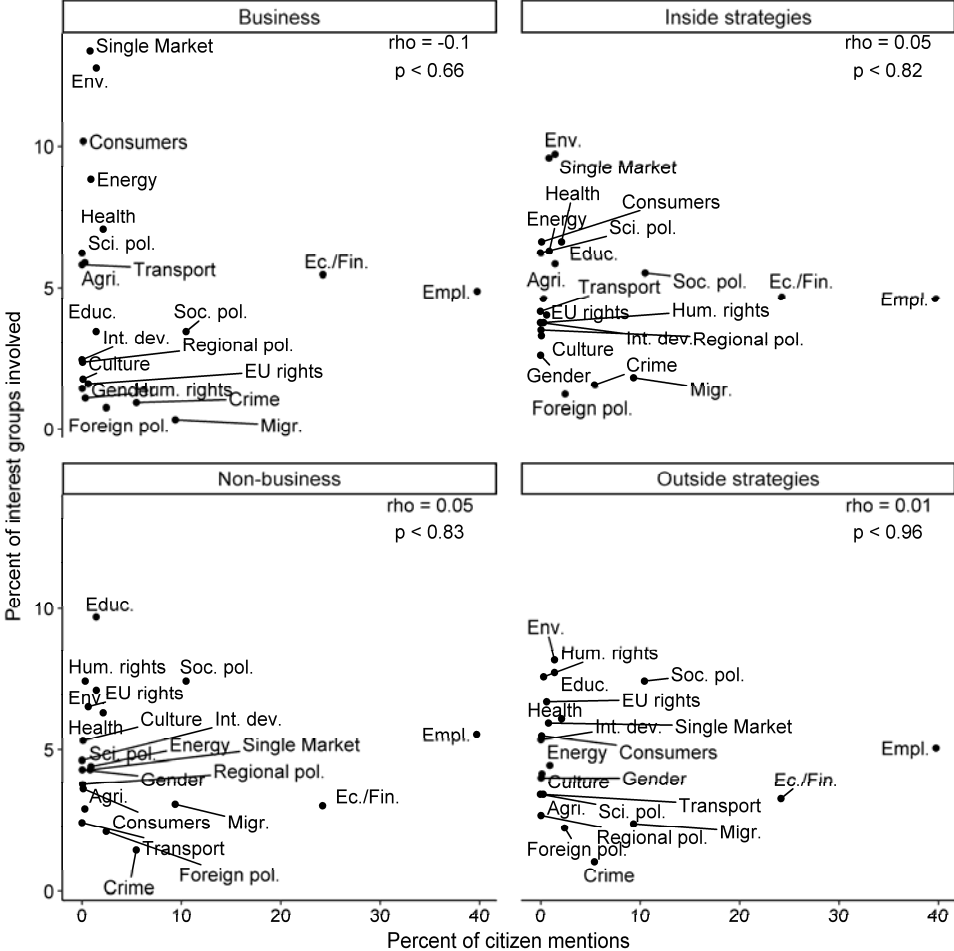


Figure 3. Interests groups and the public agenda

However, there is very little support for this expectation in our data. In Figure 3 we plot the percentages of the policy issues identified as the MIP in the public opinion survey against the percentages of those policy issues in which different types of interest organizations get involved. Business and non-business interests are not much different in terms of how their agendas reflect public concerns. This implies that the alleged gap between the EU policy agenda and general citizen concerns is not only due to the strong representation of business interests, as incongruence also characterizes other types of interests. There are minor differences, for instance, with respect to social policy or migration policy, both considered among the most important problems by citizens. Social policy takes up around 7.4 percent of the agenda among business interest groups and about 3.4 percent among non-business interest groups. A slightly higher attention to migration issues can also be observed among non-business groups. While these differences might illustrate that, when compared to business groups, non-business groups

have slightly closer priorities to those of EU citizens, the correlations in both cases remain small and statistically insignificant. When comparing the congruence between citizen priorities, on the one hand, and interest groups focusing on inside or outside strategies, a similar picture emerges. We do not find a higher congruence between outsiders and citizen groups, compared to insiders.

To test the expectation that the interest group agenda should better represent the policy priorities of citizens from North-Western EU member states, we calculated separate correlations for each country. The results do not confirm this expectation and we find no pattern that would indicate variation in congruence across member states. All correlations are below 0.4, with p-values > 0.1. Table A1 in the Appendix presents the detailed results for each country.

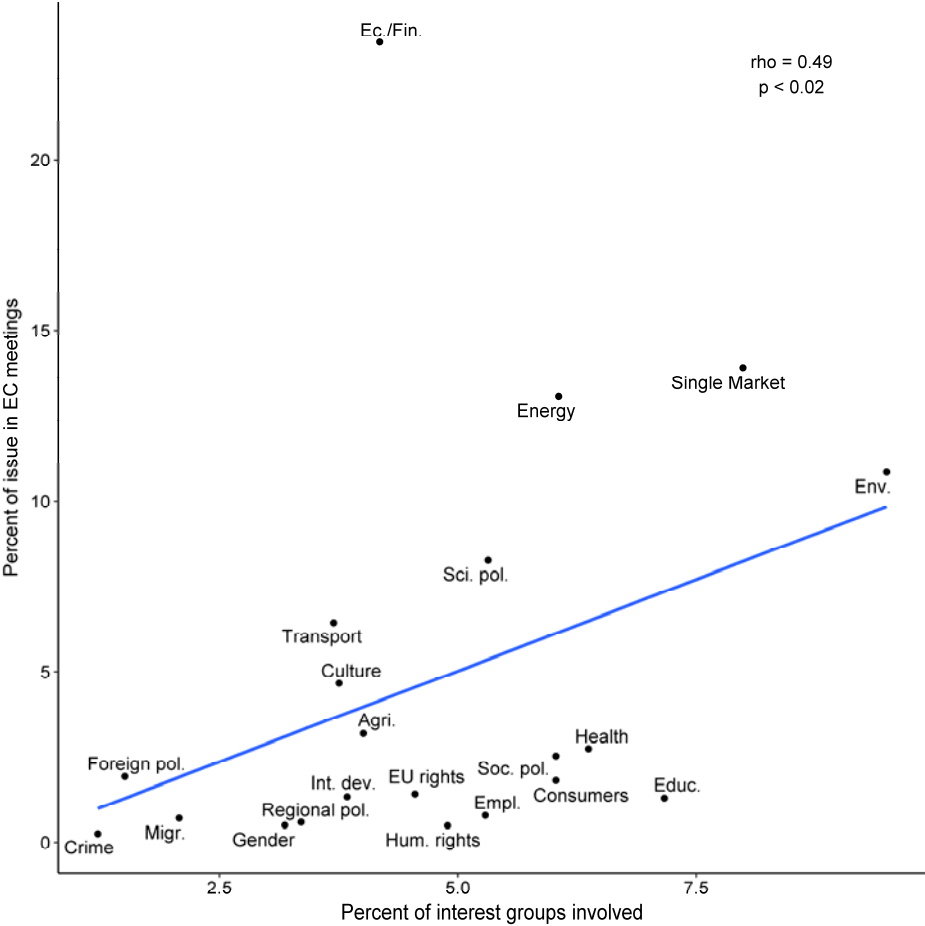


Figure 4. Interest groups and the EC agenda

In the next step of the analysis we turn to the congruence between the interest group agenda and the topics addressed in the meetings with EC policy makers. Figure 1 has already shown a somewhat closer resemblance between interest group priorities and the EC agenda.

This is illustrated more clearly when we examine the correlation between the percent of policy issues in which interest groups are involved and the attention given to these issues in the EC meetings. As shown in Figure 4, these two measures correlate fairly (Spearman's rho = 0.49) but not very strongly. Yet, the correlation is positive and statistically significantly (p-value = 0.02). More specifically, a higher attention to a policy issue on the EC agenda is associated with an increased involvement of interest groups on that issue and vice versa (lower attention to distinct policy issue in the EC is associated with a lower interest group involvement in that area). We refrain from advancing any arguments regarding the causal direction of this relationship, as further analysis would be necessary to clarify whether interest group activity drives the EC agenda or whether EC activity in certain domains leads to more interest group involvement. Yet, the analysis shows it is not the public agenda that drives advocacy in Brussels and the amount of access that policymakers supply to organized interests. It is clear that whatever the causal direction, the results show a higher overlap between the policy priorities of EC and interest groups than between those expressed by citizens and interest groups.

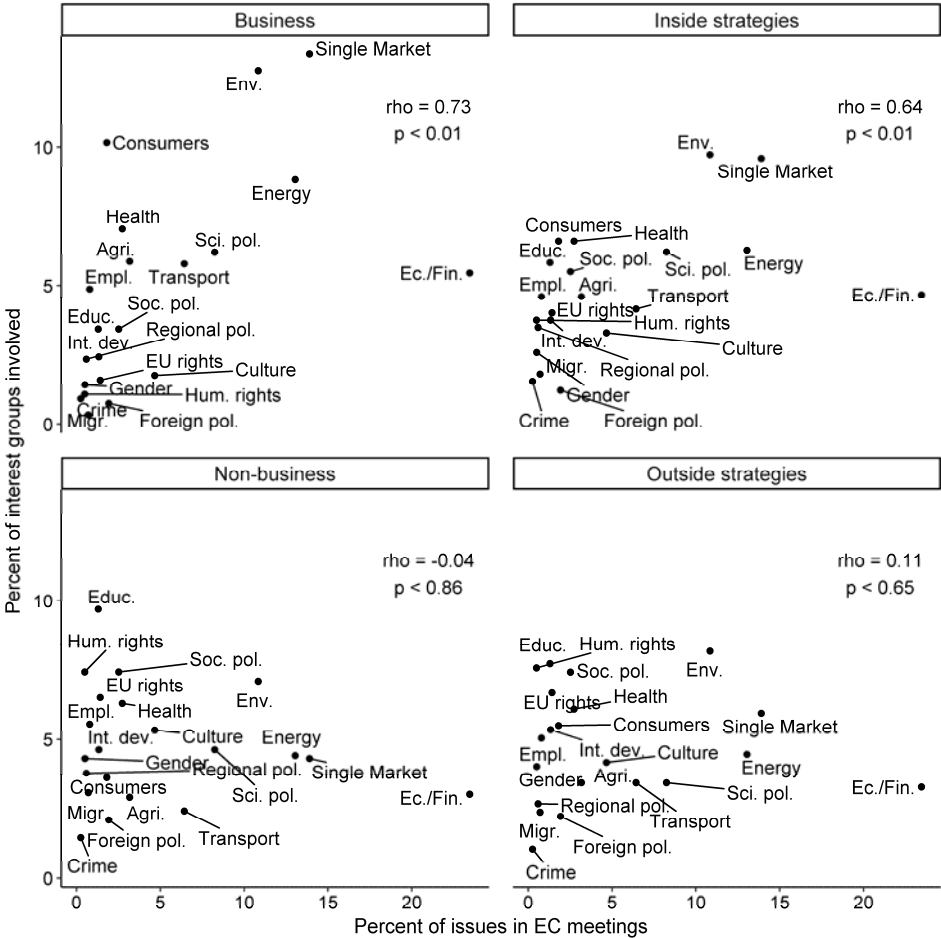


Figure 5. Interest group types and the EC agenda

When we examine the congruence between the EC agenda and the priorities of different types of interest groups in more detail, the results indicate some important differences across types of interest groups. In Figure 5 we compare and contrast the involvement of business and non-business groups in the 21 policy areas, as well as that of insiders and outsiders with the EC agenda. This detailed analysis offers a more nuanced understanding of the overall results. The policy priorities of business interest groups correlate positively and much more strongly with the EC agenda than those of all interest groups taken together ($Rho = 0.73$ compared to $Rho = 0.49$). Moreover, we also observe that non-business group policy priorities do not correlate with the EC agenda. Similarly, the policy priorities of interest groups that focus more on inside lobbying are more strongly associated with the EC agenda than those held by interest groups who focus on outside strategies.

The higher congruence between business interests and the EC agenda may not be very surprising. Some previous studies have already indicated that business groups are more likely to occupy an insider position and enjoy more access to the EC (Cowles, 1995; Dür and Mateo, 2013, 2016). Therefore, the business insiders and non-business outsiders dichotomy also partly reinforces previous findings, although these different typologies do not necessarily overlap. Many non-business groups, for instance, may pursue and find value in obtaining access to the EC. What is surprising, however, is the complete lack of congruence between the policy agenda of non-business groups or outsiders and that of the EC, implying that groups that have no access to the EC pursue a different policy agenda.

Conclusions

To conclude, our results point towards a more complex and rather biased three-level policy agenda structure: a first level including business groups, insiders and EC officials; a second level consisting of non-business groups that only have some common policy interests with the EC; and the public opinion that has a completely different agenda than both. On the other hand, these results go against the ‘transmission belt’ argument with regard to the role of interest groups, at least at the EU level and for the time frame that we consider. Interest organizations do not seem to pick up on the most important policy problems that the citizens identify and transmit them to EC officials. What we observe instead is that the interest groups that mobilize at the EU-level pursue their own agenda which correlates to an important degree to that of the EC. In short, considering the congruence with public opinion, our findings fit very well with a characterization of the EU as a system of elite-pluralism (Coen, 1998; Eising, 2007; Marsh, 1983).

Having observed a lack of congruence between citizen priorities and interest group involvement in different policy areas, on the one hand, and a strong association between the interest group and the EC agendas, on the other, raises some additional question. To begin with, an important issue that we did not address concerns whether the EC legislative agenda is more directly responsive to the policy priorities identified by the public or different subgroups thereof. For instance, are the EC's concrete regulatory activities effectively a response to the policy agenda put forward in the day-to-day meetings with organized interests. Unfortunately, our current dataset does not allow us to provide a precise answer to this question. Second, another key topic is the extent to which congruence is a function of the extent to which the EU has competences in some policy area or not. We did not control for that possibility, but future analysis should account for this. One of the problems, however, is that it is not always easy to establish whether a policy area is a EU competence or not as in many instances policy competencies are shared instead of divided. Furthermore, given the lack of congruence between the EC agenda and the most important policy problems identified by the citizens, is the EC really unresponsive to the public or is it also taking into account other issues that could be considered important? For instance, although public opinion may not consider the environment as the first (or even the second) most important problem, the EC may consider it important for a good reason. Thus, a future step in our analytical endeavor will consist in conducting a more detailed statistical examination of issue congruence between organized interests and citizens at the national level in a number of EU member states. Such further testing will help us better determine if the results we presented in this study find more robust empirical support in other political systems.

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Appendix

Table A1. Correlations between the EU interest group agenda and MIP in EU member states.

rho	p-value	country
0.35	0.12	Sweden
0.26	0.26	Bulgaria
0.25	0.28	Austria
0.25	0.28	Belgium
0.25	0.27	Portugal
0.25	0.28	Slovakia
0.24	0.3	Romania
0.23	0.32	Czech Republic
0.23	0.31	Ireland
0.22	0.33	Hungary
0.22	0.34	The Netherlands
0.21	0.36	Finland
0.19	0.41	Denmark
0.17	0.45	Poland
0.17	0.45	Slovenia
0.14	0.56	Germany
0.14	0.55	Latvia
0.13	0.56	Malta
0.12	0.61	Italy
0.11	0.62	Croatia
0.1	0.68	Estonia
0.09	0.68	Luxembourg
0.07	0.76	France
0.06	0.8	Greece
0.02	0.93	Lithuania
-0.02	0.93	United Kingdom
-0.04	0.86	Spain
-0.13	0.57	Cyprus