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BRITISH INTEREST GROUPS AND THE EUROPEAN COMMUNITY: CHANGING LOBBYING STYLES

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&

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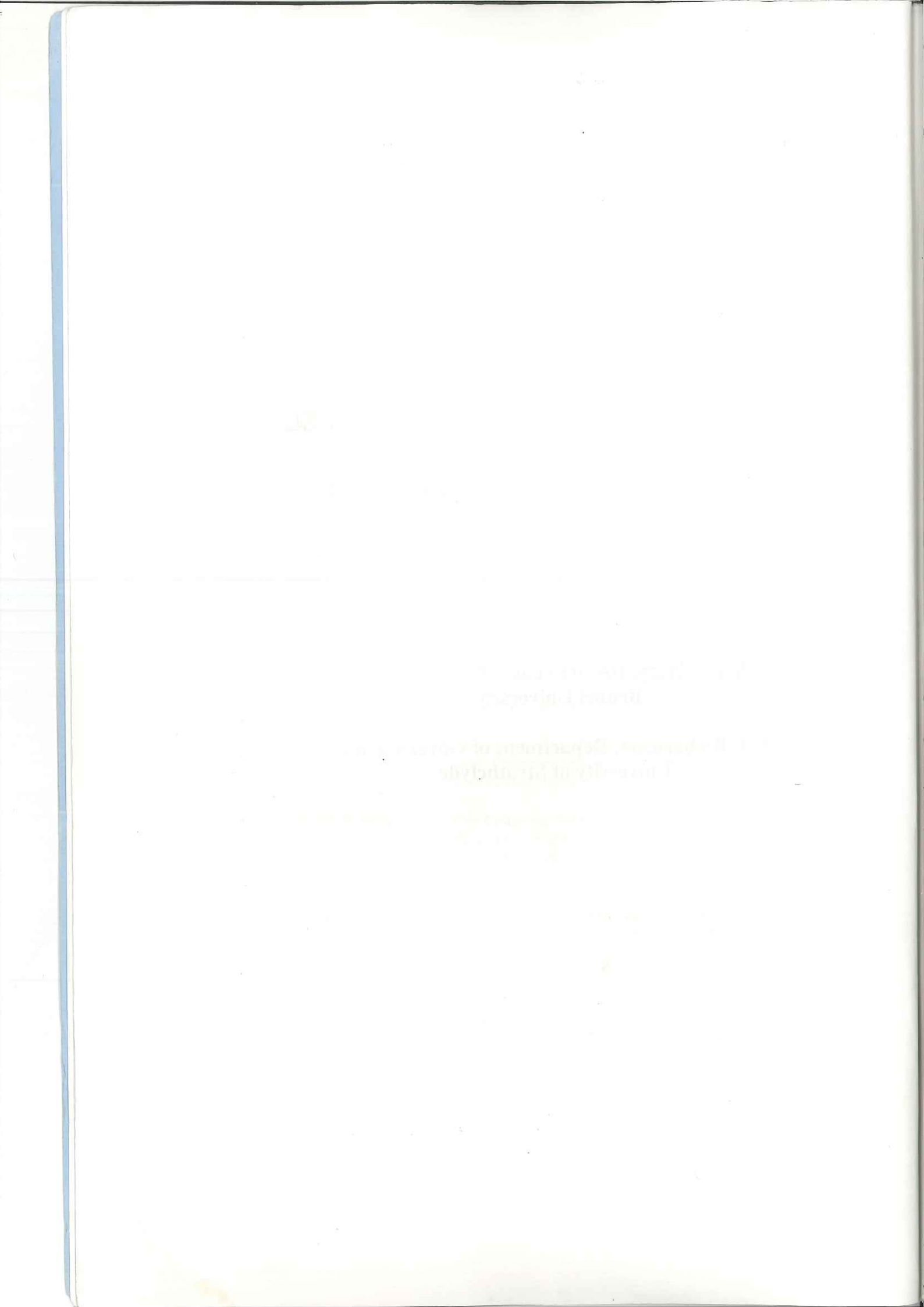
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**BRITISH PRESSURE GROUPS IN THE EC :
CHANGING LOBBYING STYLES?**

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1. INTRODUCTION¹

The adoption of the Single European Act (SEA) by the twelve EC member states in 1986 marks an important stage in the development of the Community. The SEA commits member states not only to the completion of the internal market by 1992, but also to monetary and financial integration. Other sections of the document strengthen the legal basis and widen the scope of Community policies relating to European political co-operation, economic and social cohesion, research and technological development, the environment and social policy. In order to facilitate the attainment of these objectives, the Act strengthened the legislative powers of the European Parliament and removed the need for unanimity within the Council of Ministers from those decisions pertaining to the single market. The impact of the SEA on EC policy-making is thus twofold: the scope of Community policies has been extended to include sectors which were previously the responsibility of national governments; and reform of the EC decision-making process has weakened the policy-making influence of national governments at the EC level. In short, the locus of policy-making power in these specified areas has shifted from the national level to the EC.

These changes have prompted a proliferation of interest group lobbying at the EC level. Whilst the phenomenon of European lobbying is not at all new, there has, in recent years, been a sharp increase in the number of groups and levels of resources devoted to influencing EC policy outcomes. The central aim of this article is to evaluate the response of British interest groups to the growing importance of European decision-making. Two key questions underpin this analysis: First, what problems do interest groups encounter when lobbying at the EC level? Secondly, does it make sense to talk of a European style of lobbying? The argument presented below is that, for the moment at least, there is no single or dominant model of EC-group relations. Whilst some interests have managed to establish a cohesive policy community at the EC level, most are involved in less integrated types of policy networks. These differences can be

¹ This article is based upon information obtained from interviews with a range of British interest groups engaged in EC lobbying and senior EC Commission officials. We wish to thank David Judge, Keith Dowding, David Bellamy, Martin Smith, Ella Ritchie, David Spence and various Commission officials for their comments on an earlier draft of this article and Christian-Martin Czypull for assisting with the analysis of types of Euro-groups.

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explained to some extent by the particular characteristics of different policy sectors. However, as highlighted below, the structural characteristics which underpin the EC policy-making process also inhibit the establishment of stable policy communities.

The peculiar features of EC policy-making also have important implications for the European Community itself, not least for those European Commission officials whose task is to manage the business of group consultation. Despite popular mythology, the EC bureaucracy comprises fewer than three and a half thousand senior administrators who are collectively responsible for the drafting and implementation of EC policies. The extension of the Community's sphere of competence and the resultant increase in European lobbying has – inevitably – imposed considerable strains upon an increasingly overloaded administration. For EC officials charged with the task of reconciling the interest of numerous groups from twelve member states, the Single European Act has underlined the need for interest group consultation.

The nature of interest intermediation at the EC level is thus in a state of flux; whilst groups seek to develop new strategies for effective EC lobbying, EC officials face the increasingly difficult task of managing the consultation, information exchange and implementation problems of EC policy-making. The typology of group-State relations based upon the concept of policy networks provides a useful, flexible framework within which to analyse these changes. Underpinning this typology is the concept of a policy-network, defined as a 'complex of organisations connected to each other by resource dependencies and distinguished from other...complexes by breaks in the structure of resource dependencies', (Benson, 1982, p. 148). According to Rhodes (1988), policy networks range from closed 'policy communities' to pluralistic 'issue networks'. The former are characterised by stable relationships between a limited number of participants who share a common ideology and policy preferences. Within a policy community decisions are reached on the basis of bargaining and without the participation of the public or Parliament. In contrast, issue networks involve a wide range of participants with conflicting views and policy objectives who move in and out of policy arenas, each of which contains several decision-making centres.

2. THE EXPANSION OF EC LOBBYING

Wyn Grant has noted that the relationship between pressure groups and the European Community has, so far, been a relatively neglected subject (Grant, 1989, p. 90). In Britain, there are very few general studies of groups trying to influence EC decision-making. (For examples see Kirchner and Swaiger, 1981; Butt Philip, 1985; Sargent, 1987; Grant, 1989). Yet, European-wide interest group federations have existed since the early days of the EC in industrial sectors such as agriculture, coal and steel, where responsibility for policy-making had been given to the European Commission under the Treaty of Rome. By 1970, more than 300 Euro-groups existed (Butt Philip, 1987, p. 75) and in 1980 the number of Euro-groups formally recognised by the Commission had risen to 439 (Economic and Social Committee, 1980). Some industries – whose interests were particularly intense – have been extremely effective EC lobbyists for many years. In April 1974, for example, M. Alexander Mallat, President of ATO-Chemie (a branch of the Elf Aquitaine and Total group) called for an EC organisation of the chemicals industry in order to combat intra-EC problems of over-production and the growing challenge from COMECON and the US (*Le Monde*, 27 April 1978). Similarly, in June 1978, the European federation of plastics industries, *L'Association des Fabricants de Matiges de l'Europe* (APME) asked the EC Commissioner for Industry, Etienne Davignon, to defend import levies on third world plastics in the next round of GATT negotiations and to cut East European imports (*Les Echos*, 19 June 1978). A typical example of policy benefits derived from lobbying in 1979 when the industry escaped all EC regulations concerning the free movement of goods and VAT harmonisation. A year earlier the Commission had announced its intention of facilitating the circulation of pharmaceutical products. This had provoked an outcry from the industry, followed by a meeting of 150 delegates from pharmaceutical industries in 14 countries (including non-EC countries such as Switzerland, Austria, Sweden and Norway) in Brussels (*Le Figaro*, 15 March 1979).

Prior to the 1986 Single European Act, however, much EC lobbying by national organisations or firms was conducted through national political and administrative structures. This tendency for groups to work through national ministries reflected the concentration of decision-making power within the Council of Ministers at the EC level. Since the 1966 'Luxembourg Compromise' effectively gave each national government a veto over proposals put to the Council by the European Commission, many groups relied upon national officials to defend them at the European level. Moreover, until the

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adoption of the SEA, many groups had no more than a passing interest in the EC policy process: though the principle of supremacy of EC law over national legislation was established early on, the scope of the Community's jurisdiction was, in practice, limited. In short, most interest groups were far more interested in the content of national legislation.

The Single European Act has prompted a number of changes to this pattern. It has formalised and strengthened the European Commission's powers to initiate Community policies in a number of areas (notably environmental and social policies, research and development) either not mentioned or referred to only briefly in the original Treaties. Signatories to the Single European Act have also agreed to the phased introduction of full economic and monetary union. Of more immediate importance, the Act commits member states to implementation of the internal market (i.e. the free movement of goods, services, capital and labour within the EC) by the end of 1992. This will require the introduction of some 300 harmonisation measures, 60 per cent of which have already been adopted by the Council of Ministers. Thus, at a stroke the number and range of interests directly affected by EC policy-making has increased dramatically. Moreover, the EC institutional reforms contained in the Single European Act (see below Section 3 for details) have significantly reduced the policy-making influence of national governments in key policy sectors, thereby increasing the need for interest group coalition building at the EC level.

In consequence, there has been a sharp increase in recent years in the volume and diversity of interests represented in Brussels. The latest figures indicate that there are now 525 Euro-groups (i.e. those federations which are officially recognised by the Commission) represented in Brussels though the membership, status, resources and policy-making influence of these associations varies enormously. Whilst some groups such as COPA (Committee of Professional Agricultural Organisations), UNICE (Industrial Employers), the ETUC (trade unions) and BEUC (European Bureau of Consumers' Associations) have a broad membership base, most – such as the European Association of Hearing Aid Dispensers and the European Herbal Infusions Association – are more narrowly focused with fewer members, fewer resources and a more selective interest in EC legislation. Often, the interests of a particular sector will be defended by more than one Euro-group. British Petroleum, for example, is a member of the European Federation of Chemical Industries (CEFIC), the Association of European

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Petroleum Producers (APPE), the European Petroleum Industries Association (EPIA) and the main European employers' federation, UNICE. Similarly, in addition to the umbrella organisation, CEFIC, which represents the interests of chemical federations of 14 European countries, there are at least nine major sectoral or sub-sectoral associations and sixty-five product level European associations representing the chemicals industry (Grant, 1989, p. 99). Industrial and commercial employers' interests account for almost 50 per cent of the Euro-groups, a further 25 per cent are connected with agriculture and food, around 20 per cent are related to the service industries (including the legal and banking professions), with just 5 per cent of the Euro-groups representing trade union, consumer and environmental interests (European Commission, 1990).

National associations such as the CBI (Confederation of British Industry), the CIA (Chemical Industries Association), the British Bankers' Association and the Consumers' Association in Britain also lobby independently at the European level – particularly on issues where they are at odds or competing with their European counterparts. Below this level, multi-national companies and/or economically powerful firms and organisations such as British Petroleum and Shell oil companies, Imperial Chemicals Industries, British Aerospace, Ford Motor Company, the London Stock Exchange and Unilever are as a matter of course represented in Brussels, either by their own public relations staff or by a professional consultant.

Regional and local authorities throughout the EC have also become more effective lobbyists in recent years. Despite opposition from some national governments, all the West German Länder, four Spanish regions, six French regions and two departments, and four British local authorities have recently opened offices in Brussels (Serignan, 1989). And, in 1988 the Commission established a Consultative Council of Regional and Local Authorities with consultative rights over the implementation of EC regional policies (Keating, 1990, p. 11). Three factors help to explain this trend: the growing importance of sub-national levels of government in several EC countries; the expansion of EC regional and social policies and the concomitant growth in the size of the Community's structural development funds; and the direct impact upon local and regional authorities of the establishment of a single market for utilities, water services and transport (i.e. the public procurement Directives).

Finally, non-EC groups and governments have also become much more active in Brussels. Whilst Eastern European and Chinese interests continue to rely upon

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diplomatic representation in Brussels, Japanese and American groups are among the most effective EC lobbyists. Especially influential, is the EC Committee of the American Chamber of Commerce (Amcham) which represents eighty US organisations including multi-nationals such as ITT, IBM, Allied Signal Inc., Colgate Palmolive, General Electric, General Motors etc., all of which have subsidiaries in EC countries (*Fortune*, Juin 1990, p. 78).

So, whilst several producer groups have been active EC lobbyists for many years, the amount of resources devoted to monitoring developments in Brussels has in all cases increased since the mid-1980s. The CBI, for instance, recorded twice as many meetings with EC commissioners in 1988 as with UK ministers (Grant, 1990, p. 4). Meanwhile the number of people employed in the Brussels office of the French employers' association, the Confédération National du Patronat Français (CNPF), has quadrupled since 1988 from seven to thirty-one (*Fortune*, Juin 1990, p. 78). Most groups, however, cannot afford to employ their own 'EC watcher' in Brussels. Hence, one of the most striking developments since the mid-1980s has been the explosion of professional lobbyists, financial consultants and law firms locating in Brussels. Thus, a single consultancy firm, Hill and Knowlton, employs no fewer than twenty-one consultants in Brussels (*Fortune*, Juin 1990, p. 81). In the absence of any official register of EC lobbyists, it is impossible to calculate exactly how many lobbyists actually operate at the EC level. One estimate put the figure for 1990 at 3,000 – three times that of two or three years ago (*Fortune*, Juin 1990). In addition to those groups which are more or less permanently engaged in EC lobbying, there are many other national groups and interests which enter into the EC policy-making arena less frequently.

British groups have in several sectors been among the most enthusiastic supporters of European-wide organisation. That the British should be reasonably advanced in this aspect of European integration is possibly not surprising, bearing in mind the very long tradition of an often symbiotic relationship between groups and government at the national level. Many producer interests, especially, have been well organised into national policy-making processes in Britain for at least a century (Richardson, 1990) and it comes naturally to them to seek a similar relationship with bureaucrats in Brussels once the shift in the locus of power has been recognised. Significantly, the majority of professional lobbyists, consultants and legal experts based in Brussels are also UK (and US) firms. This fact was frequently cited by non-UK groups and officials as giving Anglo-Saxon groups a considerable advantage over lobbyists from other EC countries – not least because of the considerable use made by the Commission itself of professional consultants for contract research.

**3. EC POLICY-MAKING AND IMPLEMENTING:
DECISION RULES AND RULES OF THE GAME**

Whatever cultural attitudes govern pressure group behaviour – whether these attitudes influence the attitudes of groups or bureaucrats (see Dogan, 1975) or the propensity of organised interests to emerge from the various cleavages in society – there is no doubt that institutional and structural factors are also of very considerable importance in understanding group behaviour. This is as true for the EC as it is for national systems. For example, the weakness of the European Parliament (other than perhaps in agenda setting and despite the introduction of the co-operation procedure) has similar implications for group lobbying in the EC as does the weakness of the UK Parliament (see Jordan and Richardson, 1987) or of the French National assembly (see Mény, 1990) for lobbying in Britain or France.

Interest groups seeking to influence the content of EC legislation naturally focus their energies upon those Commission officials (often from more than one Directorate-General) responsible for preparing draft proposals. In fact, Commission officials are generally acknowledged by groups to be more accessible than are Whitehall civil servants. However, one reason for this greater openness is the dependence of EC officials upon national experts and groups for detailed information about diverse technical standards, legislation and organisational structures throughout the EC. In consequence, it is virtually impossible for any single interest or national association to secure exclusive access to the relevant officials. Indeed, draft proposals are invariably revised several times following diverse representations from member states. This aspect of the EC policy process contrasts sharply with that of the UK where groups can generally rely upon the fact that major or radical changes to published White Papers are rare. A related problem for groups is the unpredictability of the European policy agenda. Though the Commission announces its own legislative programme at the beginning of each year other more pressing items may be added as a result of European Summit decisions. In addition, all national governments use their six month presidency of the Council of Ministers to promote favoured projects (e.g. the British government and the internal market) whilst MEPs, ambitious ministers, and interest groups all seek to push the Commission in certain directions. Keeping track of EC policy initiatives is therefore a major undertaking, further complicated by the highly compartmentalised structure of the Commission and the consequent need for horizontal co-ordination of EC lobbying.

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Since 1986, the European Parliament (EP) has become a somewhat more influential actor in the EC policy process and – given the likelihood of further institutional reform – is likely to become more influential in future years. Previously, the EP had no legislative powers; though MEPs were consulted over legislative proposals the Council of Ministers was under no obligation to take their views into account. In an attempt to redress the so-called 'democratic deficit' within the EC, the SEA introduced a new 'co-operation procedure' (see Figure 1) which grants the EP the right to a second reading of all Community legislation relating to the establishment and functioning of the internal market, social and economic cohesion, technological research and development and certain aspects of EC social and regional policies. This provides MEPs with a further opportunity to propose amendments to the 'common position' adopted by the Council of Ministers which can then be overridden by the Council of Ministers only by a unanimous vote.

The co-operation procedure has undoubtedly provided MEPs with additional leverage over the details of much Community legislation. As indicated in Table 1, during the period July 1987 to December 1988, 356 parliamentary amendments were accepted by the Commission of which 231 were adopted by the Council of Ministers. As Bogdanor (1989) has pointed out, the primary effect of the co-operation procedure has been to draw the Parliament into the early stages of the policy process in order that a policy compromise can be negotiated by the first reading stage – before proposals are 'firmed up' in complex package deals worked out by Commission and COREPER (Committee of Permanent Representatives) officials. For groups, the EP has thus become a useful means of achieving amendments to EC legislation. Nevertheless, the legislative powers of the EP remain – for the moment at least – limited. It has no right to initiate legislation, no legislative powers with regard to policies outside the sectors listed above and no powers to override decisions taken by the Council of Ministers. Moreover, parliamentary amendments to the common position require the support of an absolute majority of MEPs. Obtaining such support is far from simple given the lack of party discipline within the EP. Though MEPs sit in recognised trans-national party groupings within the assembly these are without exception internally divided along national and doctrinal lines.

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Thus, the most powerful EC decision-making body remains the Council of Ministers. In contrast to the Commission and the Parliament, both of which are in a sense 'European' bodies the Council is an intergovernmental body where national officials and ministers seek to secure the best possible deal for 'their' government. The fact that there is a considerable concentration of power within the Council, that its meetings are secret and closed, and that groups have no direct access to it, has significant implications for EC lobbying styles. Groups have little option at this stage but to rely upon the negotiating skills of national ministers, their civil servants and COREPER officials. However, as the Commission is a major participant in all Councils of Ministers, lobbying Commission officials gives an important element of continuity, at least for those arguments or lobby points which have a European validity.

In the past, each member state could effectively block proposals which, in theory, might have been adopted by a qualified majority by invoking (or more usually by threatening to invoke) the right of national veto granted by the Luxembourg Compromise. The SEA has – as Mrs Thatcher made clear at the time of its adoption – left intact the Luxembourg Compromise. In practice, however, the extension of majority voting to new policy sectors has been accompanied by a diminution in the use of the Luxembourg Compromise. There appears to be agreement among the member states that it should not be invoked with respect to those policy areas brought under the Community's jurisdiction for the first time in the SEA (e.g. the environment, research and development). In addition, member states have been generally reluctant to appear to be holding up legislation relating to the internal market. Thus, the extension of majority voting (54 out of 76 votes) to those sectors covered by the co-operation procedure has major implications for interest groups. By reducing the extent to which national governments within the Council are either willing or able to obstruct proposals, the greater use of majority voting has increased the incentive for groups to seek allies in other member states in order to achieve either a blocking minority or qualified majority.

Often overlooked, the European Court of Justice, which is responsible for interpreting and enforcing EC law, is also of crucial importance for EC lobbyists. In recent years, environmental organisations and women's groups, especially, have used the Court (whose appellate powers resemble those of the US Supreme Court) as a means of forcing recalcitrant national governments to implement EC legislation concerning the

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quality of drinking water and equality between working women and men (for the latter see Mazey, 1988). More generally, the supremacy of EC law over national legislation means that no group can afford to ignore EC legislative developments which might undermine policy compromises being negotiated nationally. For those groups given a frosty welcome by national policy-makers, EC lobbying may also prove a more successful means of influencing national legislation. In Britain, for example, the hostility of the present Conservative government to the European Social Charter has prompted trade unions and women's groups to redouble their efforts at the EC level in support of the Charter.

The distinctive nature of EC policy-making thus has important implications for interest groups. First, EC lobbying is a multilateral operation which requires interest groups to co-ordinate national and EC level strategies, since national politicians remain important allies within the Council of Ministers and are usually influential in determining the manner in which EC legislation is to be implemented. As a rule, no group can afford to alienate national government ministers during the course of EC lobbying, because on a whole range of other issues these ministers will be influential policy actors. Secondly, when it comes to EC policy-making, sectoral interest groups are often competing not only with their traditional adversaries (e.g. the CBI versus the TUC), but also with their counterparts from other member states. Moreover, one should not underestimate the enduring strength of nationalist sentiments and their capacity to undermine the formulation of stable transnational policy communities. Witness, for instance, (even within the relatively stable agricultural community), the recent violent clashes between British and French farmers prompted by the impact of UK lamb imports on French lamb prices. Thirdly, both the compartmentalised nature of the Commission and the problem of competitive agenda setting make it very difficult for groups to monitor EC policy developments. More generally, the EC decision-making and implementing process is not a stable one in the sense that national policy-making systems have very long histories and traditions. Changes in voting rules within the Council of Ministers and the strengthening of the European Parliament are in effect changes in the decision rules of the EC and have implications both for the organisation of EC lobbying and for its effectiveness. Plans for further institutional reform and future enlargement of the Community will undoubtedly further affect the way in which groups lobby the EC in the future.

constantly changing decision-making process will have implications for E.C. lobbying. 10

4. THE SCOPE OF EC POLICIES:

CHANGING AGENDAS AND THE POLITICS OF UNCERTAINTY

Although there are significant cross-sectoral differences in terms of the policy impact of the EC, it is not difficult to find a range of illustrative examples to show that more national groups must either develop their own EC lobbying strategies (combining attempts to influence their own government and the EC) and/or they must join (or form) European-wide groups. As with lobbying at the national level, much group activity is of course concerned with technical issues which are of low political salience to other than the affected interests. As always, therefore, it is necessary to distinguish between what Hoffmann, (1966) described as 'high' politics and 'low' politics. Just as national groups may find it difficult (or impossible) to influence issues such as nuclear deterrence or the broader aspects of energy policy, so groups operating at the European level experience difficulties in influencing such 'high' politics issues as monetary union, German reunification, EC-US relations or Community enlargement. Thus, in emphasising the increased scope and importance of lobbying at the European level – directly and indirectly via national governments – we also need to recognise that some of the really 'big' issues like political union are processed in quite a different way to those issues such as the use of cadmium in products and the exposure of workers to that substance (Grant, 1990, p. 5).

Yet, even issues which are properly characterised as high politics can be 'unpacked' into more manageable – and therefore bargainable – issues susceptible to group influence. There is also some evidence that officials recognise the need to develop something akin to 'policy communities' at the European level, as a means of managing the increasingly burdensome consultation process. EC environmental policy is a good example of this development. Though the political debate surrounding the general principles of this policy attracted widespread public interest, the Commission has sought to achieve its objectives by breaking them down into more technical issues around which it is possible to construct a more cohesive policy community. Thus, within DG XI (Environment) an ad hoc consultative group on chlorofluorocarbons (CFCs) has recently been established comprising groups which have a direct interest in

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CFCs – i.e. representatives from the chemicals industry and refrigerator, foam-rubber, plastics and aerosol manufacturers and users. The Commission's aim is to negotiate with these groups a means of meeting targets set by the Council of Ministers for reducing the use of CFCs. Significantly, environmental and consumer interests are not directly represented in this policy network which resembles a 'policy community' rather than an 'issue network'.

The range of issues – and the pace at which new issues arise at the European level – is bewildering! During spring of 1990, for instance, the EC adopted policies on public procurement (which are of major importance to EC and non-EC companies as public purchasing accounts for 15 per cent of Community GDP) as well as three new health Directives relating to patents for new drugs, the protection of workers exposed to ionising radiation and tobacco advertising. Meanwhile, MEPs considered Commission proposals for an EC audiovisual policy, consumer product safety and health and hygiene rules for meat. The April issue of the *CBI News* alone highlights the following EC-related items of concern to its members: *Social (EC) Action Programme* – listing 48 proposals in the social field deemed necessary by the Commission for the completion of the internal market; *Barriers to Takeovers* – this related to a DTI consultation paper intended as a forerunner to a European Commission study likely to contain specific proposals to remove barriers to take-overs in the EC; *Strict Liability for Defective Services* – this was a CBI commentary on the proposed EC Directive on the liabilities of service providers; *R and D Framework Programme* – the CBI was monitoring the development of the EC programme for future research and development; *EC Merger Control Regulations* – the CBI was producing its own guide to the Regulations which have been agreed by member states; *European Company Statute* – the CBI was presenting its views on this to the House of Lords Committee (as was the Engineering Employers' Federation).

British groups are also interested in the implementation of EC policies. The Engineering Employers' Federation's Director-General recently wrote to the Employment Secretary welcoming the commitment which Britain had secured from the EC Social Affairs Commissioner, Vasso Papandreou, to make regular reports to the Council of Ministers 'on the records of member states in implementing European

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legislation'. The UK minister is reported as saying: 'the UK takes its legal responsibility very seriously and we are concerned that others do likewise. There is sometimes a difference between what people say about employment and social matters and what they do in practice' (*EFF News*, April 1990, p. 5). This concern with implementation may be of importance in terms of cross-national differences in lobbying where cultural differences in attitudes to compliance may affect lobbying styles. Thus, British groups are by tradition used to a high degree of compliance and will therefore go to great lengths to ensure that the original decision is acceptable to them, on the assumption that whatever is decided will be implemented. This may be less true in other EC states where there is a tradition of non-compliance built into their political cultures. Evidence for this view is provided by the Commission's latest annual report on the application of EC legislation which shows that whilst Denmark and the UK have incorporated 80 per cent of the single market Directives into national law, in Italy 70 per cent of the Directives were still outstanding at the beginning of the year – despite the introduction of new national legislative procedures designed to facilitate implementation of EC legislation (*Commission, 1989, p.10*).

Groups face at least two major problems in coping with the growing influence of the EC. First, the European agenda is increasingly broad – even British plumbers now have to fit taps according to EC rules! Thus, at its most basic, the UK policy process is changing rapidly because there is a new actor on the scene – the European Community. Of course, Britain has been a member of the Community since 1973, but since the SEA and extension of the Commission's powers, the Community has become far more assertive and state-like. Part and parcel of this development has been increased public acceptance of the legitimacy and desirability of European legislation in a number of sectors. Secondly, the agenda is unpredictable (for the implications of this fact for lobbying tactics see Section 5 below), especially when compared with national policy agendas. One reason for the less certain agenda is the existence of different national political agendas which, in turn, leads to a degree of competitive agenda setting within the EC itself. While many issues will be common across national boundaries, others may be country specific or there may be cross-national variations in the position of common in terms on the agenda. The environmental issue is perhaps the classic

example of the differing emphases found in EC states and of the EC's agenda being influenced by certain enthusiastic actors. The Danes and West Germans have been particularly keen to maintain the environmental momentum within the EC. When a delegation from the National and Local Government Officers Association (NALGO) visited Brussels in April 1990 in an attempt to explore issues relating to water privatisation in Britain they were quickly warned by the Danish Permanent Representative that Denmark would not tolerate any relaxation of the Drinking Water Directive and would strongly resist any attempt to do so by other member states. Similarly, EC legislation controlling the use of cadmium was the result of a Danish initiative following that country's introduction of a unilateral prohibition on the product (Grant, 1990, p. 5). Yet another environmental example arose in September 1990. The Commission changed its proposals for a legislative programme to promote recycling, dropping its plans to amend the 1985 Directive on beverage containers. This was the fourth change of course within four years and was in response to legislative plans announced by the West German Government in May 1990. As the West German Government was obliged to notify the Commission of its proposals, the Commission's decision to draft an all-packaging Directive appeared 'to be intended to put it in a position to say to the German authorities that they should defer the introduction of their legislation because harmonised rules are shortly to be promulgated at EEC level' (Ends Report, 188, 1990, p.31). National issues can thus suddenly be translated into cross-national issues via the EC (e.g. the rapid response of EC agricultural ministers to the British problem of 'mad cow' disease). So, not only must the lobbyist monitor the relevant national policy networks, but (s)he must also monitor the developing policy agenda in Brussels and the developing agendas in the other Community states.

An added problem – leading to further agenda uncertainty – is that the Commission, despite being 'technocratic', is relatively small and inexpert (in the sense of lacking detailed, technical knowledge, especially across twelve nations) and is therefore often reliant on external evidence either from groups or 'experts'. Brussels bureaucrats may, therefore, be susceptible to the phenomenon identified in Britain by C.D. Foster, who argued that, lack of professional expertise in bureaucrats leads to a lack of confidence in formulating policies and to a greater reliance upon interests (Foster,

1971, p. 63). Butt Philip has also noted a special dependency relationship between officials and groups (though he does not use the term 'dependency'). He comments that:

The Commission, for its part both wants and needs contact with the many interest groups in Europe. It too needs information about the variety of positions and aspirations of Euro-groups and national pressure groups, as well as factual information which may be slow in arriving from national governments. Such information will often be essential material upon which to construct proposals and policies which will have a community application (Butt Philip, 1985, p. 42).

Commission officials face an apparent dilemma with regard to group consultation which has yet to be resolved. On the one hand, those interviewed stressed their commitment to (as well as need for) the widest possible consultation with groups. On the other hand, they also acknowledged the increasing difficulties of achieving this given the speed with which a greater amount of legislation must be prepared and the badly organised nature of many interests. Almost against their will it seems, Commission officials are in danger of being drawn into quasi-clientelist relationships with the limited number of groups which are really able to keep pace with and respond to Commission proposals.

Both the size and nature of the Commission, together with the fact that twelve different nations have an input into the policy process (as well as twelve national sets of interest groups), means that the market for policy ideas within the EC is much broader than in any one national system. This is no doubt beneficial in terms of policy innovation, but the ensuing process is more difficult for everyone – including groups – to 'manage'. Thus one characteristic of Brussels decision-making (compared to the relative predictability of, say, UK decision-making) is that new ideas and proposals can emerge from 'nowhere' with little or no warning, simply because the Commission has seen fit to consult a particular group of experts. This can happen (quite often, so it seems) because stable and predictable policy communities have generally not yet been developed at EC level.

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Thus, one of the primary advantages (to organised interests) of making policy via well-defined policy communities – namely, the prospect of a 'negotiated order' (Strauss, 1987; Richardson and Jordan, 1979) is usually lacking at EC level, or at least is much more difficult to achieve. As J.P. Olsen suggests, organisations try to avoid uncertainty by arranging 'negotiated environments' (Olsen, 1977). Uncertainty and risk, as well as conflict and competition, are avoided through the formation of stable relationships between actors. In very many policy areas at the EC level, there is simply not in existence anything like the intimate knowledge that often exists between policy actors at the national level, and neither is there sufficient common *interest* to underpin the development of stable agendas and processes. In consequence, 'issue networks', characterised by a large and changing membership with disparate interests are commonly found at the EC level. These conflicting policy objectives and frequent fluctuations in membership inhibit the formulation of stable policy agendas within such loose networks. Thus, in at least one case, in the field of environmental regulation, we were told that the Commission had – to the consternation of one UK group – initially adopted the views of 'experts' of whom other key actors had never heard! Moreover, the Commission itself seems less of a 'bureaucratic village' than are many national bureaucracies. This is partly because the bureaucrats are not drawn from common cultures and do not pass through common selection systems and common training. It is also due to the high degree of sectorisation/segmentation of policy-formulation even within Directorates. For example, in March 1990 there was considerable conflict over aviation safety proposals emanating from DG VII (Transport). DG VII had proposed new aircrew flight time regulations which would have severely restricted the time that airline pilots could fly without rest. These proposals were leaked to the industry (itself an interesting comment on the EC policy process in that the industry had never received prior warning or consultation). The industry then caused an outcry and mobilised the European Transport Commissioner to demand a full economic justification of the safety proposals. The issue quickly became a public and open conflict between different parts of the Commission (responding, respectively, to social policy considerations and to the airlines), instead of being pre-processed through the type of private bureaucratic co-ordination and negotiation which one might expect at the national level in most West European democracies. Nor was this an isolated example. We were also told of similar conflicts between DG XI (Environment) and several other DGs including DG VI

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(Agriculture), DG VII (Transport) and DG XVII (Energy) whose own activities (and interests) are being increasingly affected by the Commission's determination to develop a European environmental policy. Of course, such problems also exist at the national level. The difference is one of degree; at the EC level, the absence of stable policy communities, the increasing assertiveness of certain Commission DGs since 1986, and the extremely compartmentalised nature of the Brussels bureaucracy undoubtedly render such conflict more difficult to avoid than at national level. As Butt Philip suggests, 'Incoherent and inconsistent policy stances can easily emerge from the Commission because Directorates-General make policy decisions separately rather than jointly' (Butt Philip, 1985, p. 53).

Because of the unpredictability of the policy agenda there appears to be a greater incidence of groups having to fight 'fire brigade' campaigns at the European level, instead of the more effective group strategy of managing the political agenda in the first place, which is more usual in Britain. The process of agenda setting and policy formulation may appear to be more pluralistic at the EC level (in the sense that a much wider range of groups may be involved), but there is little evidence that the pluralistic choir sings with a particular accent. Hence, lobbying Brussels may be especially about what one Washington lobbyist described as his central task – not changing the world but minimising his surprises! Two essential questions for lobbyists are what is coming up next and from where? As at the national level, however, the agricultural sector may be the exception. As Smith notes, the agricultural agenda in Europe has been very stable, thanks to the enormous influence of agricultural groups at the EC level, replicating their influence at the national level. He notes that the dominant ideology (an EC agricultural policy) has "... meant that any pluralism within the EEC was limited. Only certain ideas would be taken seriously in policy-making. The formal pluralism was further eroded by the processes of consultation and decision-making which further privileged the farmers by only taking certain decisions and consulting insider groups" (Smith, 1990, p.154). The stability of the agricultural agenda is assisted by the virtual exclusion of other competing interests (a phenomenon probably less common in other policy areas within the EC). For example, there is little indication that consumer groups have penetrated the agricultural policy community at the EC level (Smith, 1990, p.164).

5. STRATEGIES AND STYLES OF LOBBYING:

NATIONAL POLICY COMMUNITIES -vs- EUROPEAN POLICY NETWORKS?

The agricultural case, as described by Smith, is possibly the model to which other sectional interests might aspire. In this sector the interests have secured a degree of integration with policy-making, and a stability of policies which is a supra-national reflection of the traditional national power of farming interests. Moreover, the agricultural lobby has not faced the lobbying problems faced by interests in other policy areas. In particular, there seems to have been little or no tension between the need to maintain existing national policy communities and the need to develop new international policy networks. This international network is particularly well resourced. The main Euro-organisation COPA and its sister organisation representing farmers' co-operatives (COCEGA) had, in 1981, a combined budget of 760,000 EUA (European Unit of Account), which was eight times that of the European Consumers' Group and ten times that of the environmentalists (Smith, 1990, p.161). The quasi-corporatist relationship between the farming interests and DG VI is facilitated by the fact that COPA acts as a gatekeeper for the Commission, limiting the farming groups involved in agricultural policy and processing the demands (Smith, 1990 p.162). The European dimension to lobbying has, if anything, strengthened the bonds between the farming interest in the UK and the Ministry of Agriculture, Fisheries and Food (MAFF). Thus, Smith notes that "The close relationship between the NFU and MAFF remained, and they no longer had to fight the Treasury, Foreign Office and Department of Trade, but could take decisions with eight other pro-farming ministers. The irony of the situation was that whilst membership of the EEC reduced the autonomy of the British state over agricultural policy, it increased the autonomy of the Ministry of Agriculture" (Smith, 1990, p.159).

One particular advantage which the agricultural interests have is that agricultural policy has, so far, been heavily sectorised and subject to few cross-sectoral influences. Only recently has this sectoral autonomy been challenged in Britain (Smith, 1989). Similarly, those who wish to challenge the power of the agricultural lobby at the EC level face the difficulty of a 'captured' Commission and "...a belief within Europe that agricultural policy-making should be left to those involved in agriculture" (Smith, 1990, pp.155-156). Smith goes on to quote Neville-Rolfe (1984, p.272) to the effect that

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suggestions that DGs other than DG VI should be involved in agricultural policy-making have been suppressed. This 'franchising' of public policy is far less evident elsewhere, as we suggested in the case of air transport safety rules cited above. The whole question of the EC Social Charter is another example of cross-sectoral conflicts which find certain interests (e.g. employers) having to deal with Directorates that are far less sympathetic to (or familiar with) the objectives of those interests than their UK 'sponsoring' ministries might be. Indeed, interests which have to deal with a range of Directorates within the Commission are well aware of differences in receptivity to their views. For example, one respondent remarked that there were major differences between DG V dealing with Employment and Social Affairs and DGs III and IV dealing with the Internal Market and Industrial Affairs, and Competition respectively. The latter tended to adopt a free market approach, whereas DG V is widely perceived by employer interests as the arm of European trade unions in the Commission. Several of our respondents perceived differences in policy-making styles of different Directorates. For example, one lobbyist (in the energy field) saw DG XVII Energy, as generally receptive to influence as it was relatively weak on expertise in his particular field. In contrast, DG IV (Competition), with which he also had dealings, "... has a German flavour... not much cuddling up there...". One Directorate with which he had had successful dealings in the past was now much more problematic, simply because it was now being run by a new official of a different nationality. Yet another Directorate (DG XI, Environment) was perceived by him as politicised, suspicious of his industry and as 'overcrowded' in the sense of too many groups having gained access.

A clash between what is agreed between interests and their relevant department at the national level and what the EC sees as its policy goals was illustrated in 1990 by two cases involving national support for the motor industry. Both France and Britain were in conflict with the relevant Commissioner (Sir Leon Brittan, Commissioner for competition policy) concerning subsidies to Renault and Rover, respectively. This is illustrative of a major problem for groups used to negotiating 'deals' with the government in Britain – namely, that which might be agreed easily in Whitehall can be undone by Brussels at a later stage, because it contravenes European law. In the French case, the French Government had to take back approximately half of the FFfr.12 billion (\$2.1 billion) paid in subsidies to Renault. In the British case, Sir Leon questioned the legality of some £38 million (\$65 million) paid by the British Government to British

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Aerospace in 'sweeteners' when the Rover Group was sold to British Aerospace. Basically, because the locus of power is shifting, British government departments can no longer guarantee that they can 'deliver' agreements reached in the usual consultations. A hitherto 'reliable' partner has suddenly become less reliable – in part because of a reduction in power and in part because that partner is now involved in a much more complex game where trade-offs *between* policy areas, at the EC level, are more common.

This illustrates the dependency which exists between groups and 'their' ministries, with the latter being, effectively, 'intermediaries' between the groups and the EC in the final stages of the policy-making process. Most groups are conscious that they must be careful not to alienate their own ministries by pursuing a contrary line in Brussels or Strasbourg. A typical comment was "...I would be nervous if we were clearly saying something at major odds with the DTI... we would need to take a policy-decision on that... we wouldn't do it unless it was vital and we had exhausted all other lines of bargaining with the DTI." This reflects the reality for groups, knowing as they do that the DTI (in this case) could easily ditch the group's case in the ministerial bargaining at EC level – either because the DTI was in disagreement with the group's position, or because, despite being in agreement, it felt that the group's position could be sacrificed in a bigger trade off in Europe, or because the DTI was simply lacking in sufficient expertise to grasp the precise nature of the issues involved.

More often, however, there is a recognition of mutual interest in 'dealing' with Europe, and a recognition that a common and co-ordinated strategy between group and Whitehall Department is desirable. Intelligence is usually shared because both Whitehall officials and group leaders face the same problem – the need to obtain good advance intelligence of policy change emanating from the EC. Groups are often happy to channel influence via the appropriate Whitehall Department, providing that the Department is willing to hold de-briefing sessions on its return from Brussels. Equally, Whitehall Departments are glad of briefings from groups, when the latter have especially good Brussels contacts. In such cases, the group can play the role of 'information broker' for the Department. Certainly, a wise group will not rely on 'its' Whitehall Department, but will develop its own Brussels contacts. For example, the DTI seems not to have been any more aware of developments regarding the EC's policy towards insider dealing than were the groups themselves. Both sides had been lulled by the apparently slow gestation

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of this policy, only to be caught by surprise when the pace of EC policy-making on this issue quickened in 1989. The change of pace was due to a decision by the then Spanish President of the Council of Ministers to 'notch up' a series of EC decisions before his Presidency expired. Again, this illustrates the differing decision rules facing lobbyists at the EC level, as 'notching up' is a common feature. In some cases the group may know much more than the Whitehall Department because the group may have good contacts (particularly if it is a multi-national company) in several EC states and may, therefore, be in a better position to assess the early development of policy from within a foreign government.

Being able to monitor different national developments may yet prove to be the most effective skill for groups attempting to influence European policy-making. As one interviewee put it, "... getting a handle on national priorities is the real trick." The need to acquire this information is because national agendas can be translated to the EC agenda quite quickly. In the agricultural case described by Smith, there happens to be what is probably an unusual coincidence of interest between European farmers. In other policy areas, the interests of national groups may be quite fundamentally opposed. For example, in the field of financial services there are differences in national systems and traditions. A spectacular, public, example of these national differences arose in 1989/90 concerning the capital adequacy of investment firms. The objective of the Capital Adequacy Directive is to create a single market in financial services, with effective consumer protection. The clash arose because of major structural differences between the West German and UK financial services industries. By April 1990, the Directive had gone through no fewer than five drafts, many of them radically different. From the British perspective the earlier drafts were quite satisfactory and all seemed well. Then, suddenly, a new draft was produced, reflecting the successful intervention of the German banks, turning a potentially successful UK campaign into a risky 'fire brigade' campaign needed to reverse the German success (see *The Financial Times*, 26 April 1990). In contrast to the open conflict on the Capital Adequacy Directive, the UK and German interests were at one over the case of EC policy towards insider dealing, cited earlier, and so both German and UK groups were able to lobby the EC directly to the same effect.

Despite the heat generated by the conflict over the Capital Adequacy Directive, the outcome illustrates the advantages of dealing with Brussels, as well as the

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disadvantages. Predictably, a compromise between the differing national systems was worked out, reflecting an organisational culture in Brussels which is more pragmatic than ideological. This means that, since 1979, there has been a growing divergence between lobbying the UK Government, and lobbying Brussels. In the former case, there is an increased tendency for groups to be faced by a policy position based upon the Government's ideology (for example, regarding privatisation, labour law, de-regulation). In Brussels, however, there is more likely to be a pragmatic, bargaining style, reminiscent of the post-war British policy style (Richardson and Jordan 1979; Jordan and Richardson, 1982). The Brussels bureaucracy is much smaller, more technocratic, and lobbying can be much more a technical question of agreeing a policy that works. Thus one respondent (an ex-Whitehall official) suggested that, typically, the view in Brussels was that if 'A' and 'B' both work, then let's encompass both in a Directive. This organisational culture emphasising (usually) pragmatic, consensual bargaining is also reinforced by the relative lack of expertise on the part of the Commission cited earlier.

The willingness to consult has its costs – both for decision-maker and lobbyist. One cost – to the decision-maker – is that the policy area can become too open and overcrowded (as suggested by one of our interviewees regarding DG XI). This can lead to a long drawn-out process before a decision is reached. For example, the EC took eight years to negotiate a Directive governing the manufacture of jam... "what one Brussels diplomat refers to disparagingly as 'a mixture of sugar and fruit'." The highly technical nature of some fields is such that it is not surprising that the formation of a common EC policy is time-consuming. Thus some 500 food additives are on sale in the EC, yet they all need to be subject to EC regulation (*The Financial Times*, 5 March 1990). Again, compromise – rather than policy preference – is in evidence. In the case of nutritional labelling, the EC has tried to 'square' two conflicting pressures. In making concessions to small and medium-sized companies who argued that the provision of a lot of technical details on their food would be too burdensome, the Commission was criticised by the Bureau of European Consumers Unions (BEUC), (*The Financial Times*, 5 March 1990).

Openness and a willingness to consult and a desire to 'unpack' big issues into more manageable technical problems all assist group influence at the European level. Yet the picture is one of enormous complexity, with a vast range of groups, conflicting national interests, a strongly sectorised bureaucracy, and generally unpredictable

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agendas. If we take just one specialised area as an example – biotechnology – we can see the long chain between an identifiable UK interest and decision-making at the EC level. At the end of 1989, in response to the need to manage the growing influence of the EC in this important policy area, the CBI Working Party on Biotechnology, (comprising representatives from the agro-chemicals, chemicals, food and drink, soap and detergents, pharmaceuticals and brewing industries), together with the Bio-Industry Association (BIA) agreed on a working arrangement for representing joint membership interests more forcibly in European lobbying arenas. The new arrangement is known as the UK National Biotechnology Association (UK NBA) and is working with other National Biotechnology Associations to persuade an existing Euro-group – the European Biotechnology Co-ordinating Group (EBCG) – to strengthen its operation (*CBI News*, Feb.1990). The focus for this lobbying activity to date has been the three Biotechnology Directives concerning environmental and safety aspects of the industry. Interestingly, the UK regulatory agency, The Health & Safety Executive (HSE), took the initiative – in 1988 – of setting up a Working Group to monitor inter-governmental discussions on the Directives and to co-ordinate industry's response to them. In effect the HSE is trying to mobilise a united British voice by acting as leader of a well established national policy community. At the European level, the Euro-group, EBCG seems to be relatively ineffective. CEFIC has suggested a reform of the Co-ordinating Group by allowing direct company representation within the Group. Although this suggestion was rejected, the quarterly EBCG meetings are now held on a rotational basis, with each member association taking it in turns to organise the meeting. There is a general acceptance that the Euro-group has to be made to work, as the Commission does not wish to see a proliferation of groups with whom it has to consult. Nevertheless, there is another Euro-group in the sector, formed in June 1989. This is the Senior Advisory Group-Biotechnology (SAGB) consisting of the seven big European companies, such as ICI and Monsanto Europe S.A. The Director of SAGB formerly worked for the Health and Safety Executive, for the Commission, and for OECD, and has a permanent secretariat (unlike EBCG). The Advisory Group lobbies directly in Brussels, as do the European sectoral federations. The complexity of the lobbying system in this policy area is illustrated diagrammatically in Figure 2.

The biotechnology example illustrates at least two important aspects of lobbying at the EC level – namely, the need for resources and a gradual as well as recent change in the Commission's attitude to lobbying. As with national lobbying, resources are important. A clear trend for groups to devote more and more resources to European

lobbying is evident. The most spectacular example of heavy resourcing for European level lobbying is the case of agriculture cited earlier. But an organisation like the International Stock Exchange, in London, appears to devote as much time to European lobbying as it does to UK lobbying. In other policy areas – such as water policy – the relevant groups, e.g. the Water Services Association, are only now developing their Brussels lobbying in the post-privatisation phase. (Under public ownership, the industry relied exclusively on the Department of the Environment.) Effective Euro-groups in this field do not yet exist, although there are early signs that a cross-national water policy community is developing. Even where Euro-groups exist, some national organisations, e.g. the CBI, have permanent offices in Brussels, whereas others rely on regular visits or resort to the use of Brussels-based consultants to act as 'watchdogs' in order to warn of impending policy change. Our interviewees suggest, however, that consultants have important limitations. For example, they may lack the necessary expertise to recognise what is significant for a group and they will not possess the technical expertise needed for credibility with officials in Brussels. However, they are used as facilitators – setting-up meetings and generally gathering information. Getting to know officials is, as always, a central feature of lobbying which all groups – both national groups operating in Brussels and Euro-groups – work at carefully. For example, Grant quotes the case of one US lobbyist, whose hobby was photography, who resorted to taking photographs of the children of officials in order to establish informal contacts with officials! (Grant, 1990, p.10-11). Formal visits, informal lunches, and telephone contact, are the stock in trade of lobbying at the EC, as they are at the national level. For British groups, visits to the permanent UK representatives – UKREP – are usually included as UKREP appears to be highly regarded by groups as a source of advance intelligence. In some sense, UKREP is acting as an unpaid agent for groups and appears to do an effective job. To some degree, of course, everyone is on a learning curve as the EC develops. As suggested earlier, Britain has at least one advantage in that British officials and lobbyists are used to a symbiotic relationships between groups and government and are used to a lobbying system based upon bureaucratic power. Thus the British traditions of policy-making are not unsuited to lobbying the EC, where so much decision-making is within the bureaucracy. On the other hand, British participants are also used to a unitary state, whereas the European lobbying has much to do with the working of federal organisations – and especially the complexities of different national interests – both within the Commission and within the many Euro-groups.

6. PROSPECTS:

MANAGING COMPLEXITY AND UNCERTAINTY

Just as the European Community is itself developing its institutions and policies, then so the interest group system surrounding the Community has yet to reach a stable state. We are still in the relatively early stages of group adjustment to a shift in the locus of power. We should not expect the lobbying system to be neutral as between different types of groups – any more than it is at the national level. The most successful groups will be those which exhibit the usual professional characteristics – namely, resources, advance intelligence, good contacts with bureaucrats (and parliamentarians when the occasion arises), and particularly an ability to put forward rational and technical arguments which will assist in the formulation of practical policies.

It is not surprising, therefore, that the producer interests – such as farmers, oil companies, chemical companies, airlines – are usually the most effective lobbyists at the EC level. They have the most obvious direct *interest* which is threatened by EC action (e.g. airline de-regulation) and were bound to mobilise resources in order to defend existing benefits, or to demand new ones. Even these interests, however, may have underestimated the resources and effort needed to influence the EC in the long-run. This is because there is a need for groups to monitor the developing policy agendas in the twelve member states in order to detect early signs of developments in the EC policy agenda. Even when an issue has arrived on the EC agenda and is being processed, there is a need to monitor national developments, as was illustrated in the Capital Adequacy example cited earlier. To monitor these national developments really effectively demands considerable expertise and resources on the part of groups, with obvious advantages to multi-national companies, as suggested earlier.

Considerable resources – and political skills – are also required for the setting-up and operation of Euro-groups. The fact that there has been a proliferation of Euro-groups does not mean that they are necessarily successful. CEFIC is seen as a 'model' but that may be unusual, as it is dominated by a few large multi-nationals with the expertise and resources to formulate (and deliver) a coherent group strategy on most issues. Other policy areas are much more problematic in terms of the emergence of effective Euro-groups. For example, the financial services sector presents difficult

problems in organising a Euro-group because the national industries are so different in terms of structure that even equivalent *national* groups do not exist. The process of formulating group policy at the national level is often difficult, because of conflicts of interest among members (e.g. between small and large firms in trade associations). This difficulty is multiplied twelve-fold in Euro-groups (indeed it is worse than that as many Euro-groups include non-EC members). Much more needs to be known about the coalition building process in these federal organisations before we can draw firm conclusions about their effectiveness. However, a common criticism is that they produce lowest common denominator policies because of the need to compromise conflicting interests (Grant, 1989, p.102).

This presents problems for the Commission. As national, Euro, and extra-Euro (e.g. US and Japan) interests mobilise to influence EC decision-making, there are signs that policy sectors are becoming overcrowded and difficult to manage. A small bureaucracy, with increasing workloads, is unable to cope with a further proliferation of groups seeking to influence EC policy-making. Predictably, the question of the regulation of lobbying is now on the agenda with pressure mounting within the EP for registration of EC lobbyists, although we would expect this to be no more effective than at the national level (see *The European*, 18-20 May 1990). It seems likely that the Commission will rely more heavily on Euro-groups in the consultation process or to rely on national governments to be the spokesperson of their groups on each issue. Thus, direct lobbying by national groups might become more difficult, forcing them to rely more heavily on intermediaries.

Finally, we may see a shift in the balance of power between different interests. For example, British environmental policy, hitherto well 'managed' (Richardson and Watts, 1985) is now likely to be much more open to external influences because of EC initiatives (e.g. over water pollution policy). Moreover, the increased influence of the EC and the European Parliament provides new opportunities for the environmentalists to shift the balance of power rather more in their favour than has been the case at the national level in the UK. Similarly, trade unions – now extremely weak in terms of policy influence in the UK – may be able to exercise greater influence at the EC level where the prevailing ideology is more favourable. One particular advantage which outsider groups – such as environmentalists and consumers – may have at the European

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level is that they can utilise 'whistle-blowing' to warn the Commission of implementation failure (Grant, 1990, p.20). Indeed, the whole question of the *implementation* of EC policy – and the role of the Court in the implementation process – is of considerable importance for groups, if only because the intervention of the courts may weaken the advantage that national groups have in dealing with national government regarding implementation. We noted earlier that the British style is (generally) to take implementation seriously. As Jacqueline de Groot (Co-ordinator of the EC group setting-up the European Women's lobby) has pointed out "Britain is always the country that tries to hold back Social reforms, but once they are passed, it has a better record than most in implementing them" (*The Independent*, 18 June 1990). British groups may have rather less to lose from increased Court intervention in the implementation process and may have adopted the right strategy for EC lobbying, in the long-run viz. concentrating on influencing policy formulation, rather than relying upon implementation failure. Increasingly, groups disfavoured by national lobbying systems will try to influence Brussels and Strasbourg to ensure that initiatives favourable to them are implemented. For example, in June 1990, it was reported that "... the army of organisations with an interest in higher social standards in Community countries – including trade unions, women's groups and associations for the disabled and retired – have been growing impatient" (*The European*, 15-17 June 1990). Evidence that hitherto weak groups could gain greater leverage at the EC level came in the same month when Britain reacted furiously to the Commission's proposed implementation of those provision of the Social Charter dealing with the harmonization of conditions for part-time and temporary workers (*The Independent*, 14 June 1990). Seemingly, not only must interest groups, adjust to the new realities of European decision-making, but also governments must be better organised!

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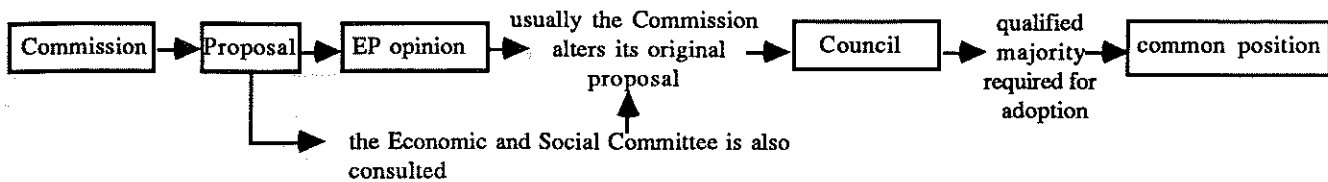
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Smith, Martin J. (1990), *The Politics of Agricultural Support in Britain: the Development of the Agricultural Policy Community*, (Aldershot, Dartmouth).

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FIGURE 1
CO-OPERATION PROCEDURE

First Reading



Second Reading

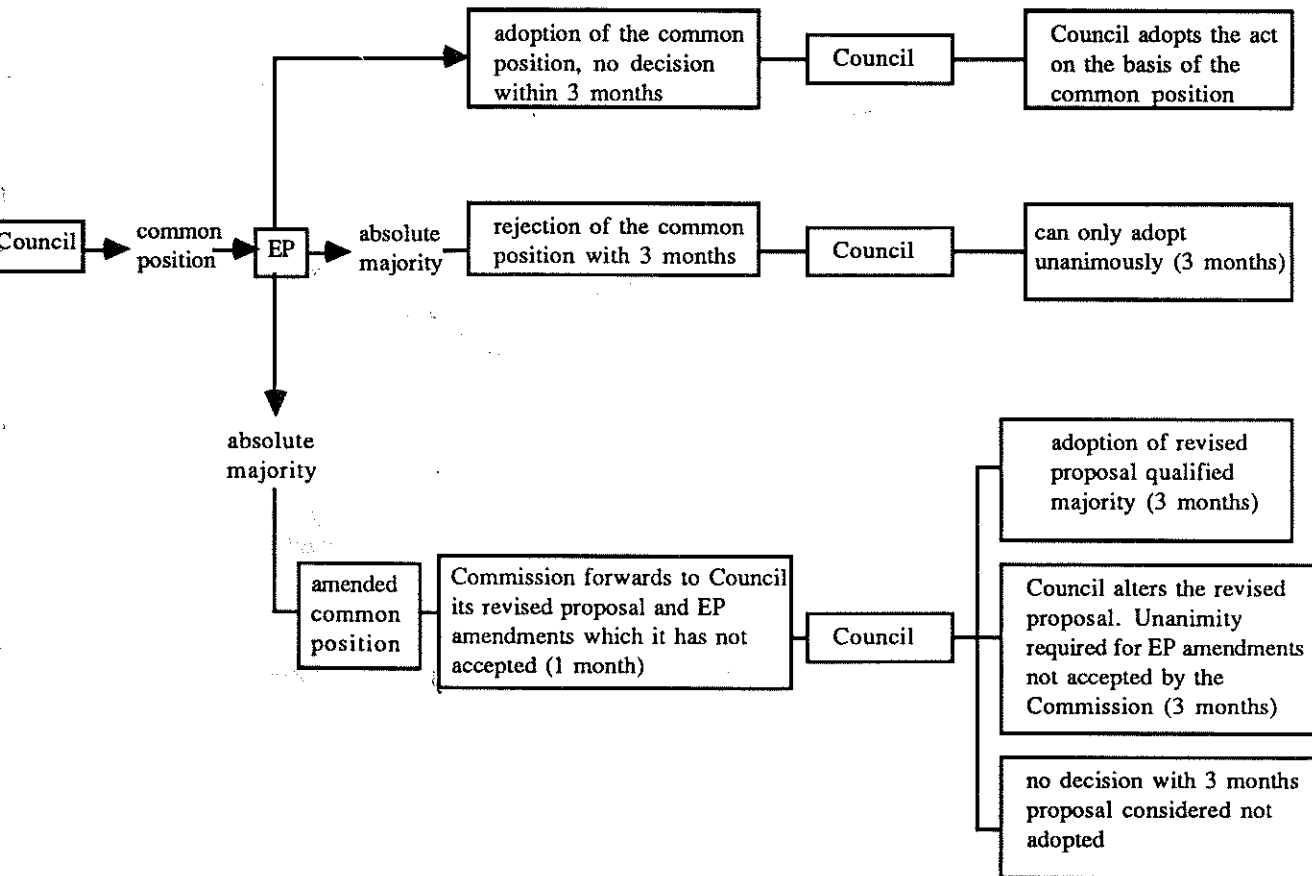


TABLE 1

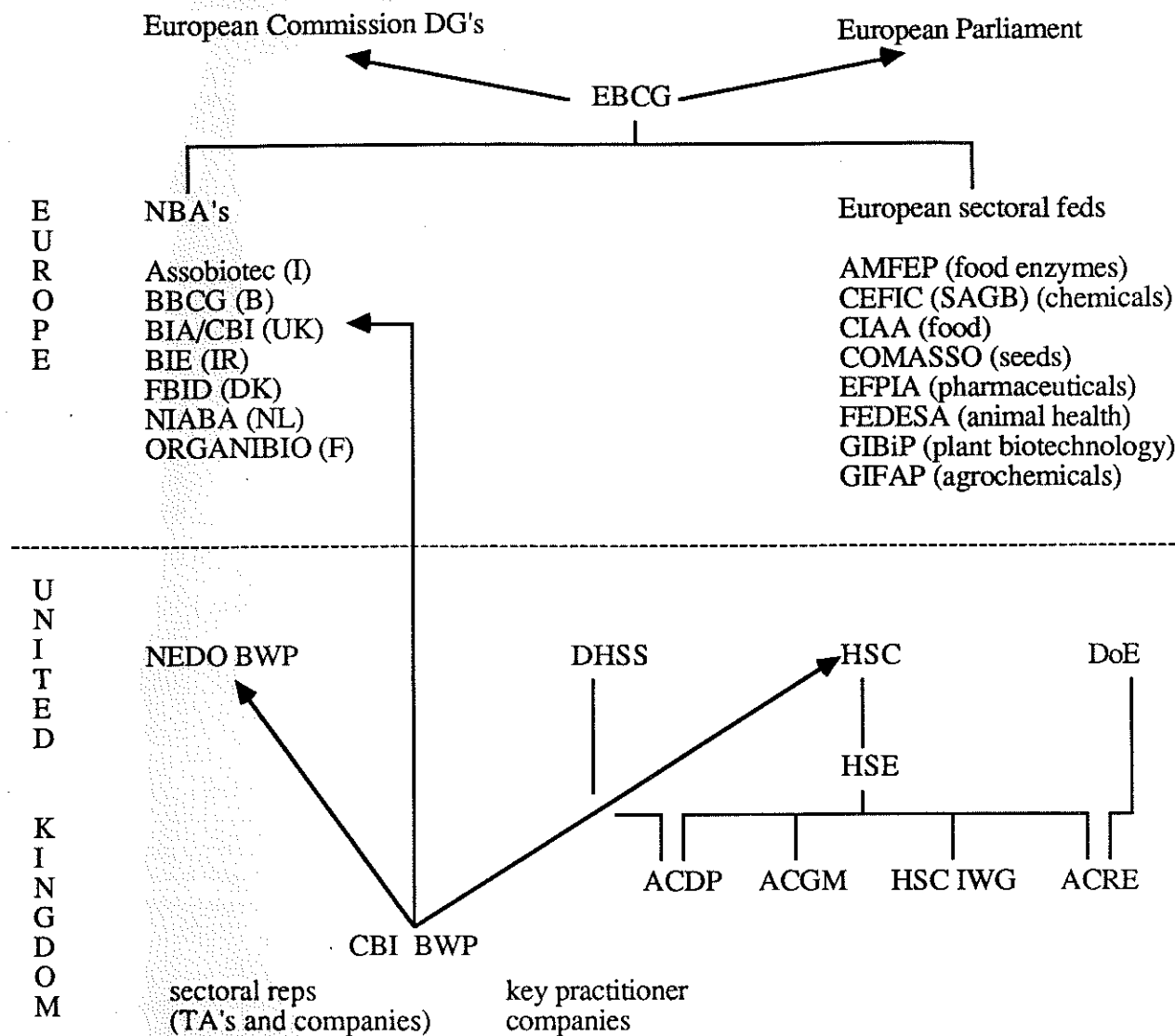
**FINAL RESULTS OF THE
COOPERATION PROCEDURE
(July 1987 to December 1988)**

Amendments adopted by Parliament	Amendments accepted*			
	by the Commission		by the Council	
		%		%
First reading	294	60	212	44
Second reading	62	58	19**	23

* In whole or in part

** Council accepted 19 out of 84

FIGURE 2: CBI BIOTECHNOLOGY WORKING PARTY LOBBYING STRUCTURE



- ABBREVIATIONS:**
- AMFEP: Association of Microbiol. Food Enzyme Producers
 - CEFIC: European Council of Chemical Manuf. Federations
 - CIAA: Confederation of the Food & Drink Industries of the EEC
 - COMASSO: The Association of Plant Breeders of the EEC
 - EFPIA: European Federation of Pharmaceutical Industries Association
 - FEDESA: European Federation of Animal Health
 - GIBiP: Green Industry Biotechnology Platform
 - GIFAP: International Group of National Associations of Agrochemical Manufacturers
 - ACDP: Advisory Committee on Dangerous Pathogens
 - ACGM: Advisory Committee on Genetic Manipulation
 - ACRE: Advisory Committee on Release to the Environment
 - DoE: Department of the Environment
 - DHSS: Department of Health and Social Security
 - HSC: Health and Safety Commission
 - HSC IWG: Health and Safety Commission Informal Working Group
 - HSE: Health and Safety Executive