Out of Many, One? The Policy Portfolio of Brussels’ Based Regional Interests

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Abstract. The literature on territorial lobbying in the EU has paid much attention to the interaction between regional offices and central state governments, as well as their relation with the European institutions. Surprisingly, far less systematic research has been conducted on the policy domains and policy issues regional representations prioritize in Brussels. In this paper, we argue that the issue prioritization of regionalist interests forms an important ingredient of their strategic repertoire as knowledge about these priorities or policy portfolios offers insights into the type of interests territorial lobbies represent and how they organize their representation. Empirically, we demonstrate the varying nature of Brussels’ regional offices potential and realized policy portfolio, i.e. the set of issues in which they invest resources. For this analysis we combine website coding and document analysis with evidence collected through a telephone survey with 180 officials from regional offices and trans-regional associations.
Introduction

During the past decade, various studies have focused on the activities of regional offices in Brussels, highlighting the differences in their action repertoire (Jeffrey 1997; Marks, Heasley et al. 2002; Huyssuenne and Jans 2008; Rowe 2011). In this literature, much attention has been paid to the interaction between sub-national authorities (SNAs) and central state governments, as well as their relation with the European institutions. All these representations fulfill similar functions, as they act as two-direction communication channels between their home base and the European institutions. They monitor policy developments in Brussels, and as such represent a kind of ‘early warning systems’ for regional governments. In addition, they may take a pro-active stance by offering information to the Commission in the early stages of the policy cycle.

Surprisingly, far less systematic research has been conducted on the policy domains and policy issues regional representations prioritize in Brussels. However, case-studies show that there are considerable differences in terms of the type of policies and issues that attract the attention of these actors. For instance, Jeffrey underlined the different nature of UK and German offices. Whereas German offices generally aimed to shape EU policy, UK offices were more focused on monitoring activities (1997). Such differences are not necessarily a matter of variation across member-states. Distinct behavior of regional representations can also be observed within countries. Criekemans for example shows that the policy priorities of the Belgian regions – Flanders and Wallonia – varies considerably (Criekemans 2010). The Flemish representation is generally active on a wide range of EU policy topics and considers EU policies as a key component of its external policy, while Wallonia, in spite of having identical policy competences, has a much more specialized policy portfolio, mainly focused on the Interreg Programme. There are also substantial differences between trans-regional associations. Some of these have a very broad and generic focus – for instance REGLEG, the European Network of Regions with Legislative Powers – while others have a more narrow and specific (sectoral) focus – for instance, the Association des Régions Européennes des Produit d’Origine. In sum, some regional representations monitor and lobby developments within a small number of domains or concentrate on one single topic, while others encompass broader, general interests, that are not confined to a particular policy domain.

In this paper we conceive Brussels’ based territorial representations as interest organizations. True, these actors are distinct from many other organized interests in the sense that they represent the public sector, democratically elected executives and territorial
jurisdictions. However, many of the activities SNAs deploy in Brussels, for instance their attempts to represent their interests through collective forms of representation, can be considered as equivalent to interest group behavior (Donas and Beyers 2012). In this regard, it is no surprise that some previous studies on regional representations strongly relied on interest group literature (for instance Marks, Nielsen et al. 1996; Marks, Heasley et al. 2002). Organized interests can be conceived as ‘issue entrepreneurs’ as most of their activities are strongly issue-related (Baumgartner and Leech 1998; Baumgartner and Leech 2001). To represent their constituency, they need to conceptualize their constituencies’ interests, translate these into operational terms and identify concrete policy positions. Organized interests spend a large amount of time and effort on issue prioritization. This process also plays a crucial role during the policy process, as exchanges with policymakers often revolve around issue-related expertise. This know-how affects how policymakers understand concrete policy issues and shapes their thinking about possible solutions. Finally, the nature of issue prioritization may feed back into the nature of an organization’s membership. For instance, an organization that prioritizes only a few highly technical issues will serve a different constituency and apply different strategies, compared to an advocacy group that focuses on issues of a more general and salient nature.

The policy portfolio of regional representations, which we define as the set of policy domains and issues in which these actors invests resources, provides us with an interesting puzzle. Most regional representations rely on a small staff and limited resources, while the jurisdictions they represent frequently have interests in a large and very diverse number of areas. But just as any other organization, these regional representations face a ‘bottleneck of attention’, implying that ‘only one or a very few things can be attended simultaneously’ (Simon 1985). As a result, regional interests will not become politically active on every issue of interest. Most issues will drop from their organizational agenda, or receive only scant attention.

A key question therefore is what type of issues and domains attract the attention of regional representations, i.e. how the policy portfolio of these actors is defined, and what the implications are in terms of policy networks and political strategies. For answering these questions, we develop a conceptual framework that relies on earlier work done by interest group scholars distinguishing generalist interests, who focus on a wide variety of topics, and niche players, who concentrate on a small number of narrow issues. Empirically, we focus on the Brussels’ based community of regional interest organizations that encompasses a mixture
of generalist and specialist organizations. This population is similar to other fields that generally encompass a majority of specialized organizations and a small (but often well-resourced) number of generalist associations (Walker 1991; Heinz, Laumann et al. 1993; Heaney 2004; Soule and King 2008; Halpin and Binderkrantz-Skorkjær 2009; Halpin 2011). As the latter generally have a large potential portfolio, their issue prioritization will be of a different nature than that of a more specialist organization, whose portfolio is often limited to a small set of issues within a particular policy domain. Usually it is expected that organized interests with a more general outlook are central players and show a higher capability to integrate, aggregate and represent the demands of larger coalitions (Browne 1990; Halpin and Thomas III 2011). However, even organizations with rather encompassing goals may focus on specific issues in their day-to-day interactions with policymakers (Browne 1990, 489).

In sum, our main research focus concerns the issue prioritization by territorial interest organizations: what explains the nature of their policy portfolio, or the issues and domains that attract their attention? In the next section, we further clarify the concept of policy portfolio and address its analytical dimensions. The second section of the paper presents our research design and dataset, for which we combine website coding and document analysis with evidence collected through a telephone survey with 180 officials from regional offices and trans-regional associations. The third part of the paper presents some preliminary results of our data-analyses.

**The importance of policy portfolios**

The policy portfolio consists of the set of policy domains and issues in which organized interests invest resources. This portfolio represents a key ingredient of an organization’s identity or DNA, together with other elements such as a group’s representational role, ideological credibility and technical experience (Heaney 2004). The identity defines what is core, distinctive and enduring about an organization (Albert and Whetten 1985). It enables an interest organization to differentiate itself from other interests, in particular its opponents or competitors. The latter two are not necessarily political rivals, but can also be similar or like-minded organizations who tap a comparable pool of members

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1 Notwithstanding this observation, various authors claim that interest group populations are characterized by rising degrees of specialization, as interest organizations increasingly focus on a narrow set of issues, defining ‘a highly specific issue niche for itself and fixing its specified political assets within that niche’ (Browne 1990; Gray and Lowery 1996; but see Halpin and Thomas 2012).
and resources (Lowery and Gray 1995; Gray and Lowery 1996; Gray and Lowery 2000; Lowery 2007).

These policy portfolios are quite relevant as they provide cues about what an organization stands for. They also have an important signaling function towards an organization’s environment, such as political elites, constituencies, and other organized interests. In the case of Brussels’ based regional representations, who are agencies of regional executives, they also provide a signal to the principals about the organization’s activities in Brussels. Similar to an organization’s identity, important parts of the portfolio of a regional interests (in particular its core interest, and to a lesser extent its policy domain interests) are shaped during the first years of an organization’s existence. Afterwards, they generally remains quite stable. A geographical centrally located region with a large harbor infrastructure will develop a core interest in transport policies and, given the immobile nature of these types of structural features, such core interests will be rather sticky. Moreover, as organized interests develop, they become increasingly (structurally and socially) tied to other actors in their environment. This structural embeddedness renders organizations dependent on networks and existing policies, which further steers the way they evolve over time. Therefore, reversing the course of action is costly and may decrease the survival chances of an organization. As a result, identities, and related to this policy portfolios, constrain an organization’s action repertoire and its future development (Soule and King 2008). Even if an organization has the capability to engage in certain new issues or policy domains, such changes might not take place as they do not fit its current identity.

Policy portfolios are shaped by both endogenous and exogenous factors. Choices are made and priorities are set at the moment an organization is established and its main mission is defined. In addition, portfolios depend on structural political and economic factors, such as the governmental agenda and the economic needs of a constituency. Much of an organization’s energy goes into conceptualizing and operationalizing the organization’s interests, as well as identifying concrete policy positions. In addition, during political exchanges, organized interests respond to demands by policymakers for issue- or domain-specific policy information. As a result of these contingencies, policy portfolios do not change overnight. Yet, to some extent they are malleable and shaped by the two audiences organized interests need to take into consideration: their membership and governmental authorities (Schmitter and Streeck 1999 [1982]). If constituencies change considerably and/or if
government agencies put new issues on the agenda, policy portfolios will adapt accordingly. As Strolovitch extensively demonstrates in her work on affirmative advocacy:

‘there is no objectively determined set of issues that are central to a group’s mission or niche. Rather, it is (...) perceptions about and constructions of their missions and niches that are key, perceptions and constructions that are influenced a great deal by the same factors that suppress levels of activity on some issues while boosting activities on other issues’ (2007, 108).

**The varying nature of policy portfolios**

The nature of policy portfolios can be quite diverse, considering that organized interest lobby on various policy issues in different forms and varying degrees of intensity (Strolovitch 2007). Interest organizations might monitor a wide range of policy domains, ranging from environmental matters to financial affairs. However, in their interaction with European or national actors, they may prioritize and focus on a more narrow set of policy issues. Consequently, the realized portfolio of an organized interest usually covers only a fraction of the potential portfolio. The potential portfolio can be conceived as substantive-based and can be inferred from the type of constituency an organization represents. In contrast, the realized portfolio is more behavior-based and can be deduced from effective political engagement.

The difference between potential and realized portfolios finely illustrates the ambiguous nature of issue prioritization. Although organized interests usually specialize in one or a few issues at a time, this prioritization of issues requires the monitoring of several domains in order to anticipate important policy developments (Baumgartner and Leech 1998, 1204). Therefore, the need to specialize presupposes some generalist orientation. Organized interests face substantial uncertainties in terms of how the governmental agenda will evolve. This uncertainty stimulates them to broadly monitor their environment, and thus not limit their attention to one single field or topic. This monitoring behavior is particularly relevant for new and young organized interests, as they still need to establish their policy portfolio and seek a viable policy niche.

Indeed, much research demonstrates that organized interests divide their attention and resources, and generally monitor (or have ‘some interest’ in) more than one policy domain (Walker 1991; Heinz, Laumann et al. 1993; Beyers and Braun 2012). However, monitoring does not equal effective lobbying, nor does it imply sustained interactions with state actors. Typically, an organized interest will be associated with those issues on which it is politically active and consequently takes a clearly articulated stance. Moreover, most organized interests will be known for the small number of issues on which many interests become involved, but
much less from the large amount of narrow issues in which only a small set of interests shows some activity. However, the monitoring practices and the set of latent issues, that are usually not of prime importance to an organization, might be very important for understanding its functioning and policy networks. If necessary, an interest group can quickly become political active on those issues. Furthermore, by monitoring their policy environment, interest groups are also able to scan the organizational landscape in various policy domains, and may start building (informal) coalitions.

Policy portfolios can be conceptualized in different ways. In the previous section, we already hinted at the distinction between generalist and specialist portfolios which concerns the scope of the niche in which an organization is active (Beyers and Kerremans 2007). Whereas the general mission of interest organizations might be highly similar or even identical, the translation of this general mission into political action can differ considerably. As argued by Scott, organizations such as the Sierra Club and Greenpeace gain legitimacy from the broader environmental movement, but carve out limited goals around which to mobilize attention and resources’ (2001). A similar argument can be made about Brussels’ based regional representations. They all fulfill a similar function or role, and they all gain legitimacy from defending regional interests. Yet their concrete policy goals and prioritized objectives can be highly different.

In order to further characterize portfolios, we need to focus on the substantive dimension of a policy portfolio, more precisely their conflictual and representative nature. Both dimensions relate to the contingent and contextualized nature of policy portfolios.

First, the amount of organized interests that share the same policy issues or domains in their portfolio informs us about the conflictual nature of an organization’s policy portfolio. As already mentioned above, most policy issues gain little or no attention. The higher the proportion of this type of issues in an organization’s policy portfolio, the lower the chance that this organization faces much political competition. But where broad and large coalitions get involved, the chances for conflict expansion are much higher. So the substantive nature of an individual organization’s policy portfolio is also affected by the number of other interests that are attracted to topics that are part of its portfolio. As the amount of involved interest organizations increases, we may differentiate between particularistic (where only a very few stakeholders are involved), divisive issues (which generate conflict confined to a particular sector) and unifying issues (that attract a wide and diverse range of actors who are linked to several policy domains) (Smith 2000). Key is that the autonomy of an individual organization
to select or prioritize the issues, as well as the nature of its portfolio, is highly contingent and
dependent on contextual factors, for instance the amount of other actors that have the same
issues in their portfolio. These portfolios are also strongly driven by exogenous components,
as stochastic events and crises, or the result of social cascade effects in specific policy
communities (Baumgartner and Leech 2001; Halpin 2011). And importantly, in case
important policy reforms are on the governmental agenda, organized interests cannot afford to
remain absent and have no other option to become involved; “when a train is leaving the
station, it is better to get on board rather than to be run over (Baumgartner et al. 2009: 254). In
sum, “it is rare that a single actor can determine the scope or salience of the conflict in which
they are involved, it is a collective process, not an individual choice” (Baumgartner 2009,
520). Issues acquire a specific confrontational nature only after multiple organized interests
have decided whether or not to become politically active on these matters. As a result, a
policy portfolio, more precisely its overlap with portfolios of other stakeholders, informs us
about the policy processes and policy conflicts an organized interest is involved in.

Second, the representative dimension considers the extent to which a policy portfolio
reflects the core interest of a lobbying organization and the extent to which it represents the
interest of its constituency. For interests with a large and possibly heterogeneous
constituency, such as regional representations, the representative dimension might be
complicated. What exactly do regional offices represent in Brussels? Are these regional
businesses and firms, farmers, consumers, the transport sector or environmental groups?
Within a regional executive, or the Brussels’ office, different opinions regarding the
prioritization of issues may exist. Sometimes these different priorities might be incompatible
(e.g. investing in a road infrastructure and protecting the environment) (Schlozman and
Tierney 1986). As a result, managing this diversity, and establishing a portfolio that satisfies
the constituency, frequently represents quite a challenge (Schmitter and Streeck 1999 [1982],
15). In many cases, the general interests is defended and presented in a very broad way,
relating to a ‘common interest’ of a constituency (e.g. farmers, economic development,
etcetera), while the concrete issue-centered organizational agenda is geared to a particular
subset of that constituency (Moe 1980; Salisbury 1983; Strolovitch 2007).

Explaining policy portfolios of regional interests in Brussels

In this section we present some explanatory variables that possibly affect the nature of
an SNA’s policy portfolio. An important caveat is that empirical dataset is still preliminary.
We have not yet coded all variables we need for testing suitable models and although we have a good sense of our main *explanandum*, policy portfolios, we are still reflecting on the *explanans*. Our research expectations will be embedded into contemporary empirical and theoretical literature on population ecology, interest representation and state-society relations (Lowery and Gray 1995; Gray and Lowery 1996; Gray and Lowery 2000; Messer, Berkhout et al. 2011). A central theoretical idea in this literature is that the composition of interest communities is shaped by the overall complex multi-layered context in which constituent entities operate. We take the political and economic internal characteristics of an SNA as a starting point and combine these with contextual factors that possibly shape their policy portfolio (such as its time in Brussels and the staff size) in order to explain for the differences in focus and scope.

Regarding political-institutional variables, it can be expected that, because they are potentially more affected by implementation problems related to EU law, SNAs with more competencies need more information on EU policies compared to SNAs that are involved in fewer policy domains. For those regions with a large amount of self-rule – authority exercised by the SNA executive over the constituency living in the region – we expect a higher need to influence EU policies (Marks, Nielsen et al. 1996; Schakel 2000). Regions that need policy information are more likely to have a larger portfolio, in particular when it comes to the monitoring of multiple policy domains, as they are in more need of gaining information on EU policies.

Shared-rule implies that sub-state jurisdictions enjoy some level of autonomy, but in addition also exercise collectively authority in the country as a whole (Schakel 2000). Given the fact that many of the regional competencies in shared-rule systems are also central government competences, we expect that SNAs with much shared-rule need to collaborate more intensively with SNAs of the same country, for instance in order to influence the national position. Therefore, an increase in shared-rule will positively impact the domestic cooperation and coordination and lower the importance of monitoring many policy domains in Brussels. Regions with much shared-rule will monitor more policy areas compared to regions that do not benefit from self- or shared-rule. There close involvement in domestic policymaking processes requires that they are informed about key policy development. But given the fact that they share these responsibilities with other domestic regions, their inclination to monitor many policy areas will be lower compared to regions with much self-rule.
The presence of parties that strive for more regional autonomy – regionalist parties – heats up the autonomy debate within a region, which is something that may stimulate an SNA executive to develop its own presence in Brussels (Bauer 2006). The fact that regionalist parties are usually also strongly EU-oriented and/or pro-European makes that they are eager to develop EU-level strategies (Marks and Wilson 1999). In general, regions with a strong presence of regionalist parties are expected to be more active in Brussels and thus have a larger EU policy portfolio.

The resource push hypothesis predicts that especially resourceful SNAs are more likely to invest in a large policy portfolio (Marks, Nielsen et al. 1996; Nielsen and Salk 1998), as they have the capabilities to broaden their range of activity. However, this is especially the case for policy domains which require a larger investment of the participant, whether in time or financial resources. For instance, in a policy domain where many other stakeholders are active it might be more demanding to gain attention. On the other hand, one could argue that these Brussels offices are driven by their constituency and that more resourceful regions will also have additional economic interests to represent. Consequently, the hypothesis is that the amount of resources will have a significant positive impact.

The third group of variables focuses upon the presence in Brussels of a regional government through a liaison office or a trans-regional associations. Following Marks, Haesly and Mbaye (2002), a Brussels office lowers the transaction costs of informational exchanges and facilitates dense cooperative networks (see also Borras 1993). Our data-set shows that a large majority of regional representations is situated in a square mile around the European parliament, which lowers transaction costs and facilitates the exchange of information with trans-regional networks and associations based in Brussels. Especially two variables related to the Brussels scene help to explain variation in policy portfolio, namely the staff size of the regional office and its experience and knowledge of how to act in Brussels. Both features result in a larger policy portfolio, as these regional representations in Brussels are more able to be informed and to invest in these networks. In addition, differential effects can be expected for the staff size. The larger the staff size of the regional office, the more able the office will be to invest in new and specialized policies. A larger staff will be more capable to invest in setting up and creating new policy projects with other regional representations that are active in Brussels. Another variable that helps to explain the differences in network embeddedness is the numbers of years that an SNA is represented in Brussels. The longer a region is present in Brussels, the better informed it will be of the ongoing policy processes.
and the specific information required for lobbying success. Consequently, it is expected that the longer a region is represented in Brussels, the more policy processes it will be able to monitor.

Finally, these regions are also member of a large amount of formal and informal trans-regional networks (Donas and Beyers 2012). In this regard, we have two competing hypotheses. These networks could be an extension of the policy interests of a Brussels office, and as a result they will not affect the size of its policy portfolio. On the other hand, they could function as a replacement of the policy focus of the Brussels offices, resulting in a decrease in the size of their policy portfolio.

Data and research design

One important part of our project consists of the systematic mapping of territorial representations that are active in Brussels. For this we relied on data collection techniques that are becoming increasingly common in research on organized interests (Berkhout and Lowery 2007; Halpin and Jordan 2011). More concretely, we combine directories published by private organizations with registers created by European and Brussels institutions (for details see Donas and Beyers 2012). This led to a population of 297 EU sub-state jurisdictions that are involved in 275 territorial representation, more precisely 175 (74%) liaison offices, 25 (49%) partial national associations, 7 (16%) complete national associations and 68 (87%) trans-regional associations.

In a next stage we coded all these representations on the basis of public available data such as Schakel’s indices on regional autonomy (Schakel 2000), OECD data on economic development, dependence on EU cohesion funds as well as the existence of regionalist parties that strive for more regional autonomy. This paper combines this evidence with data collected through a large telephone survey (conducted in the Fall of 2011 and Spring of 2012). We started out with contacting 258 of the 275 territorial representations in Brussels, leaving out the those representations that are part of a member-state Permanent Representation. We aimed to interview only one representation per region. In total, by conducting 167 telephone interviews\(^2\) we were able to collect data on policy portfolios for 182 regional representations,

\(^2\) Two respondents answered through email.
which implies that our dataset covers the population of Brussels’ based regional representations fairly well.\footnote{This unequal number is explained that in some occasion one expert covered two organized interests during one single (and somewhat longer) interview. For instance, questions on the activities of the regional representation of Flevoland and the Region Randstad were answered during the same interview as the head represented both regions.}

In total, 76 of the contacted representations did not take part in our interviews. In only 29 cases we were confronted with a refusal, or it appeared to be difficult to find a suitable moment to do the interview. For 47 regional representations, we have a strong indications through contact with officials from the same member-state (either regional representations of the same country or from the central government Permanent Representation) that they have temporarily closed down or substantially decreased their activities in Brussels. In most of these cases our interviewees pointed at the fact that for several regions the financial crises has seriously hit on the budget available for a permanent presence in Brussels. Several (but not all) of these regions originate from member-states where the financial crisis has hit hard (Greece) or from some less prosperous, mostly East European, member-states.

Adding these 47 hibernating regional representations with a rather unstable representation to the 14 respondents who claimed that their representations does generally not develop lobbying activities, and the 9 who were not actively lobbying during the past six months\footnote{Based on answering the question: Does your representation lobby on EU legislative processes? The nine other organizations indicated that they did not lobby on concrete issues during the past six months.}, makes that in total 70 (or an estimated 25\%) of the regional representations are rather weakly active when it comes to lobbying. Most of these organizations only monitor the policy scene, or their representation in Brussels serves other purposes (such as seeking project funding).

The interviews varied strongly in length. Some took 10 minutes, others 1 hour. The largest majority of the respondents were the head of office (127) with an average experience of 6 years at the organization. In the remainder of this paper we focus on three central questions we posed during the interviews. The first question aims to discover the type of policy domains that are monitored by the regional representation and was formulated as follows:

\textit{In the next set of questions I will ask you about the policy domains your organization is active in. This means that you screen on a regular basis upcoming legislation, exchange information with colleagues and report to your regional government/members. I will now give you a list of 18 policy domains. Could you tell}
me which of these are important in the sense that your organizations spends a lot of resources monitoring developments in these domains. [GO THROUGH A LIST OF DOMAINS]

The next two questions probe into concrete lobbying behavior developed during the past six month and were phrased as follows:

- Which are the EU legislative processes your organization has been actively seeking attention for the interests of your region (members) during the past six months? More concretely, we refer to proposals for directives or regulations submitted by the Commission, ongoing legislative work that involves the Council and the Parliament, or Green and White Books.

- Which is the most important one?

Combining the responses to both questions allows us to describe and analyze the policy portfolio of regional representation in Brussels. An important caveat is that the empirical dataset and analyses are still preliminary. We have not yet coded all variables we need for testing suitable models and although we have a good sense of our main explanandum, policy portfolios, we are still reflecting on the explanans.

Data analysis

A first topic we address concerns the scope of engagement of Brussels’ based regional representations. In this regard, two expectations were put forward. First, populations of organized interests are generally characterized by a high number of specialist interest organizations that focus on a narrow set of issues that are mostly situated in similar (or highly related) domains. While most populations also contain some generalist interest organizations, the latter usually represent a minority. Second, in the previous section, we distinguished between the monitoring of policy developments and actual lobbying behavior, that is political activity on legislative issues. While various regional interest organizations may monitor a considerable number of policy domains, we expect their actual policy involvement to be more limited, as they prioritize and select certain issues.

As demonstrated in figure 1, a similar observation can be made regarding Brussels’ based regional interests. As far as domains are concerned, which relate to ‘policy interest’, we note that scope of attention is generally quite broad (median and mode=10; kurtosis =.54, skewness=.81). In contrast, the ‘breadth of engagement’ regarding issues is much more limited, as most organizations focus on 2 legislative matters (median and mode=2, kurtosis=1.69, skewness=1.68). In other words, while multiple policy fields may be of interest
to regional interest organizations, in their concrete lobbying behavior only a very limited number of legislative issues will be prioritized (Browne 1990; Halpin and Binderkrantz-Skorkjær 2009; Halpin and Thomas III 2011).

**Figure 1. Issue and domain attention of regional representations (n=182)**

Through an open question about lobbying activities during the past six months we identified policy processes related to 42 issues in which our respondents developed lobbying activities. The number of issues per DG varies from 1 to 4, however most issues concern regulatory policies. Of these 42 issues, 13 referred to Directorate Generals (DGs) of the European Commission that Broscheid and Coen coded as redistributive, the other 30 are under the auspices of DGs whose policy competence is more regulative in nature (2003). A closer look at the issue-level (ignoring the DGs from which these issues originate) reveals that 27 are regulatory and 7 redistributive in nature. Among the latter we count the reform of the CAP and cohesion policies as examples. The regulatory issues concern issues such as Eurovignette, the Air Quality Directive of the Working Time Directive.

In addition, the monitoring of policy domains was coded into the different DGs. In figure 2 we show the discrepancy between monitoring and lobbying behavior by comparing how field attention (or ‘domain interest’) and issue attention varies across the different DGs. Although it appears as if regulatory issues gain substantial attention, when we consider the

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5 Broscheid and Coen identify the following DGs as distributive: AGRI, DEVCO, EAC, EMPLO, MARE, REGIO, RTD. The others are conceived as regulatory.
total number of regional interests mobilizing on each issue, we observe a strongly positively skewed distribution. While the skewness for domain attention is -.40, the skewness for issue attention is 1.63 and the skewness for the most important issue is 3.01. This means that although regional interests seem to specialize at the individual level, at the aggregate level most attention goes to a highly small set of, mostly redistributive, issues.

Regarding field attention, figure 2 shows that regional interests organizations spread their monitoring activities across several DGs. However, actual lobbying behavior varies considerably across these venues. Only in the case of DG REGIO, we observe that the great majority of ‘interested’ regional interest organizations also engages in lobbying activities (71%). A similar pattern can be discerned for DG AGRI (62%). For all the other DGs, a far lower proportion of the ‘interested’ regional representations demonstrate actual political engagement. In the survey, the interest organizations were also asked to identify the legislative process of greatest importance to them (‘the most important issues’). Here, the bandwagoning mechanism becomes even outspoken as 100 representations identified issues linked to DG REGIO as most important.

**Figure 2. Field attention, issue attention and issue importance, DG-level (n=182)**

A closer look at the policy portfolio of some individual regional representations shows us that important differences can be observed regarding the total number of issues, the balance of issues between redistributive and regulatory DGs as well as the concentration of issues
across DGs (using a Herfindahl-Hirschman index⁶). Here, we have included three Brussels’ based regional representations and three associations as illustrations of how these various measures could vary (more systematic analysis still needs to be completed). Considering only these examples, and comparing the concentration of topics, we notice that (as expected) the issue activity (name organization_ACT) is generally more concentrated than the domain interest (name organizations_INT). Furthermore, it appears that associations have a slightly more diversified portfolio, while compared to offices they also employ more activities on regulatory issues. However, this table is mainly included as illustration, as these “hunches” obviously need to be tested in a more systematic way.

### Table 1. Policy portfolios of regional interest organizations

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It is clear that DG REGIO attracts most lobbying and is the center of attention for a considerable number of regional interest organizations. This should be no surprise as regional policies are a matter of great concern for regional representations. Regional policies are important for those who benefit from the EU’s budget, yet also for those who contribute considerably. However, many regions have policy competences and, related to the latter, interests in a wide range of domains. Those interests are potentially the result of specific industry interests, or may be connected to particular regulatory regimes. Hence, the concentration of lobby attention in the DG REGIO does not necessarily fit with the constituency or imputed interest of the region. To a large extent, it is part of the a dynamic within this community of regional interests, as attention begets attention, and as the

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⁶ This index is calculated by summing the squared proportions of every category in each strategic council/economic sector. The value of the index ranges from .1 (even distribution across all categories) to 1 (concentration in a single category).
The governmental agenda of the European Commission strongly shapes what regional representations need to care about.

Some regional representations have established a policy portfolio that goes beyond the crowded lobby scene concentrated on DG REGIO. As already mentioned, about 27 issues are regulatory in nature and most of these issues attract a rather small number of regional representations (on average 3 per issues). In contrast, the 7 redistributive issues attract on average 39 representations per issue. It seems that we have different types of policy portfolios: a) a group whose focus is on monitoring, less on lobbying, b) a large group that is mainly concerned about redistributive lobbying and c) a smaller group that, in addition to redistributive issues, also focuses on regulative lobbying. In order to illustrate these differences, Table 2 below presents bivariate Pearson product moment correlations between the extensiveness of domain monitoring, the focus on redistributive versus regulatory issues, the importance of fund seeking activities for the regional office, the staff of the office, the (logged) GDP of the region represented, the regional autonomy index of the regions (RAI) and the amount of funds received from the cohesion funds.

Table 2. Correlates of policy portfolios (N=132 regional offices, Pearson product moment correlations)

<table>
<thead>
<tr>
<th></th>
<th>N issues lobbied</th>
<th>N redistributive issues</th>
<th>N regulatory issues</th>
<th>% fund seeking activities</th>
<th>RAI</th>
<th>Staff size office</th>
<th>Logged GDP</th>
<th>Resources gained from cohesion funds</th>
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<td>Logged GDP</td>
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<td>p&lt;0.0001</td>
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Looking at the patterns of correlations is appears that more resources in terms of staff and regional GDP imply higher levels of both monitoring and lobbying. Moreover, an increase in the number of policy domains monitored increases the number of issues one
lobbies, but it needs to be added that the correlations are not very substantial. For lobbying behavior we distinguished the number of redistributive issues from regulatory issues. Both indices are unrelated, which means that, although both refer to lobbying behavior, they point at different types of portfolios. Representations that lobby on regulatory issues are not more likely to lobby on redistributive issues and vice versa. During the telephone interview, we asked to respondents to indicate what percentage of their time and energy they spend on seeking EU-funds. The analysis shows that fund-seeking is a distinct type of activities, that is not equally pursued by all offices. Although the correlations are not very high, they suggest that substantial fund-seeking efforts correspond negatively with lobbying practices, in particular regulatory lobbying, regional autonomy and GDP. Or, rich regions or regions with high levels of autonomy are less likely to use their presence in Brussels for seeking EU funds.

Rich regions, regions with much autonomy and in particular regions with a large Brussels staff are significantly more likely to invest resources in regulative lobbying (but less in fund-seeking). In contrast, redistributive lobbying is much less clearly tied to RAI, staff resources or GDP because almost all regional representations (90% of the interviewed offices) have redistributive issues in their portfolio. Regarding redistributive lobbying, there is not much to explain. The lobbying by regional representations is strongly geared to redistributive issues. Regulatory lobbying is conducted by a much smaller set of regional representations (38% of the interviewed offices), and these mostly represent rich regions, with a highly level of GDP, much autonomy and low level of financial support from the EU cohesion funds. The results on staff resources are interesting as they demonstrate that staff size has implications for policy portfolios. Regional representations that increase their staff size will expand their portfolio, not for monitoring more policy domains, but for more expansive lobbying practices.

We tried various multivariate models aiming to control for the net-effect of staff-size, GDP, regional autonomy and dependence on the EU budget, but (till now) we failed in our attempts. The main reason for this is that several of our independent variables are strongly correlated (see bottom table 2), which makes it impossible to disentangle the precise net-effect in a reliable manner. Yet, the inter-correlations are interesting as they demonstrate how our indicators measuring resource-endowment are strongly interrelated. Basically, representations that represent SNAs with high levels of autonomy have a bigger staff-size and a higher GDP, while regions that benefit from a high GDP tend to spend more staff resources

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7 The question was phrased as follows: ‘Could you tell me how much percent of your organization’s time and energy is devoted to the search for EU funding opportunities?’
on their Brussels’ office. This demonstrates that the policy portfolio of a regional representation, more in particular the type of issues on which it lobbies, is strongly related to the resources a region can mobilize.

**Conclusion and Discussion**

Whereas much earlier work on EU territorial lobbying has focused on the interaction between regional offices and central state governments, or their relation to EU institutions, less attention has been given to the policy domains and issues these regional representations prioritize. We consider these policy portfolios as a crucial component of their strategic repertoire, since they clarify the type of interests these territorial lobbies represent and explain their behavior in Brussels. While these regional representations all fulfill a similar function, considerable differences exist regarding the type of policies and issues they prioritize. Moreover, most of these regional representations rely on a small staff and limited resources, while the jurisdictions they represent frequently have interests in a large and very diverse number of areas. As a result, their realized portfolio will usually cover only a fraction of their potential portfolio. Whereas the latter is substantive-based, inferred from the organization’s constituency, the former is behavior-based, relating to effective political activities. In this paper, we demonstrated that the policy interests of Brussels’ based regional representations are usually quite broad. On average, these actors monitor developments in various policy domains. However, their policy engagement is much more restricted and generally limited to 2 legislative matters. While these regional representations might monitor several policy fields, they prioritize a fairly limited number of legislative issues in their lobbying behavior.

The precise composition of these policy portfolios depends on both endogenous and exogenous factors, choices made at the time of establishment and structural political and economic factors, such as their constituency and the governmental agenda. While portfolios will not change overnight, to some extent they can adjusted as a region’s constituency evolves, or new issues emerge on the governmental agenda. We have demonstrated that, while regional interest organizations spread their monitoring activities across several DGs, their actual lobbying behavior varies considerably across these venues. Only in the cases of DG REGIO and DG AGRI, a considerable proportion of “interested” actors also becomes politically active. The other DGs are much less crowded, as only few regional representations target these venues in their lobbying behavior. In other words, although regional interests seem to specialize at the individual level, at the aggregate level, most attention goes to a
highly small set of, mostly redistributive, issues. To a large extent, this concentration of lobby
attention is part of the a dynamic within this community of regional interests, as attention
begs attention and the governmental agenda of the European Commission strongly shapes
the activities of regional representations.

From our preliminary analyses, it appears that based on policy portfolios three types of
regional representations can be distinguished: a group that primarily focuses on monitoring, a
large set of actors that mainly concentrates on redistributive issues (and one or two regulatory
ones), and a minority that in addition to these redistributive matters also engages in lobbying
on several issues of a regulatory nature. If we consider the characteristics of these regional
representations, we observe that especially (a limited set of) rich regions, who enjoy much
autonomy and have a large representation in Brussels, are likely to engage in regulatory
lobbying (they also demonstrate less fund-seeking behavior). Redistributive lobbying
activities are less strongly linked to these features, as almost all regional representations (90% of
the interviewed offices) are active on some of these issues. Lobbying by regional
representations thus seems strongly geared towards redistributive issues.


**Literature**


