National venue shopping in the European policy-making: testing ground

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Abstract (170/300)

The multilevel governance literature devotes much attention to supranational governing arrangements and shows that private interests increasingly bypass national levels and become active at the European level (the ‘Brussels’ route). In contrast, this contribution analyses the use of contacts with domestic actors and the national media (national venue shopping) in the EU’s multilevel polity. Building on previous studies, the interactions of interest groups with national governments, parliaments and media are explained in terms of access-seeking by interest groups. The empirical analysis builds on data obtained through media study and web mining in: Germany, the Netherlands, Sweden, and the United Kingdom. The data map the lobbying strategies of national interest organizations on 20 European directive proposals. The findings of the empirical analysis confirm importance of the national institutional context, even in lobbying on the European matters, point to the saliency of the issues under consideration as a potential explanatory variable, and discuss a possibility that the European level modes of interest representation have only minor influence on the national lobbying.

Key words: national level, national interest groups, seeking access, national venue shopping
INTRODUCTION

Analysts acknowledge that, in the European Union, interest groups lobby in two different contexts: at the European level and their own national setting (Binderkrantz and Rasmussen 2015, Beyers and Kerremans 2012, Beyers and Kerremans 2007, Hosli et al 2004). However, it is important to note that most interest groups still prioritize the national level when it comes to their lobbying activities and exercising influence, even in the sectors where the EU has a lot of competences (Beyers et al 2015, Kresi et al 2007). Thus, we should not give-away with the national level studies as of yet. The use of the multi-venue shopping at the European level was confirmed by a number of scholars (e.g. Mazey and Richardson 2001, Beyers et al 2008, Kerremans and Princen 2008, Maurer, Mittag and Wessels 2003). But, what can we say about interest organizations engaging with their domestic actors in the lobbying on European matters (their national, horizontal venue shopping when it comes to the lobbying on the European policy-making)? To whom interest groups seek access to and how often? What are their preferential access points at the domestic level?

Thus, this contribution looks into interactions of interest groups with their domestic actors – the national governments, parliaments and media - in the European policy process. Those interactions are explained in terms of access-seeking by interest groups – the channelling or exchange of policy-relevant information through formal and informal networks with public actors (Beyers 2002). More specifically, the interest of the article is whether groups have a preference while addressing one domestic actor above another, and if so what explains variation across national interest groups in their selection of domestic venues when lobbying on European matters? The article is a testing ground for three sets of hypotheses. It firstly revisits the hypothesis that the national context – i.e. if groups are active in a more corporatist or pluralist country – is important when it comes to the domestic lobbying on the European issues. While the theme is extensively explored in the EU studies (see for example: Esing et al XXX [this issue]), two opposite camps emerge on consequences of that variable and a more comprehensive study (large-N in comparative perspective) is needed. Further, the article hypothesises the importance of saliency of the proposal under consideration and explores if it can be a factor explaining access patterns. It posits that high saliency of the issue in media will be responsible for the increased contacts of groups with the national media and multiple, horizontal venue shopping. It also explores the idea that the European level lobbying environment has an influence on the behaviour of groups in the domestic arenas. The tested argument, firstly, explores a possibility that groups’ activity at the European level expands their horizons and encourages horizontal venue shopping at the domestic level; secondly, the patterns of insider and outsider strategies deployed at the European level, are multiplied at the national level.

The results of the article feed a large debate on the empirical and comprehensive evaluation of interest groups influence in the EU multi-level system and resonate with an extensive theme in the groups’ literature, i.e. whether different layers of government provide alternative channels of interest representation for national groups (Beyers and Kerremans 2012). As previous studies showed that not all groups can ‘afford’ multi-venue (vertical) shopping (see for example: Beyers 2002) understanding the processes taking place at the national level is crucial.
Moreover, the study of the national arena in the EU multi-level system in particular reverses the earlier conclusions of a substantial Europeinization literature that deals with the adoption of national modes of interest intermediation at the European level (Eising 2006) and looks into the process of ‘downloading’ of the European modes of interaction into the national arenas (Hix and Goetz 2000) making the debate more comprehensive.

The article fills a narrow gap between the studies looking at the interest groups seeking access at the European level and those texts that perform the exclusive analysis of groups’ activity in the domestic policy-making. It draws on a literature that made significant progress in explaining interest group lobbying and access to the European policy process (e.g. Beyers 2002, Beyers and Kerremans 2007, 2012, Binderkrantz and Pedersen 2016, Dür and Mateo 2012, 2014, Eising 2007, Falkner 2000, Klüver 2010), but shifts the focus to the domestic arena and is complementary to the previous studies. Few noticeable exceptions focused on domestic actors as lobbying targets within European policy process: Rasmussen looked at interactions of interest groups with national parties (2013), and their participation in the national consultations in Denmark and the United Kingdom (2015), Constantelos explored business groups’ activity in Italy (2004), Bernhagen and Trani explored interest group mobilization and lobbying patterns in Britain (2012), and Wonka looked into the interactions between German Bundestag and interest groups on the EU politics (XXX [this issue]). Despite considerable progress, the overwhelming tendency is to focus either on the European level or the effects this has on the domestic structures (just to mention few: Costantelos 2007, Princen 2007, Beyers et al, 2015). Prominently, there is a lack of studies that examine access patterns of interest organizations in the European policy process at the national level within a larger case study design.

Consequently, the article has two main contributions. Firstly, it focuses only on interest group interactions with the domestic actors in their national arenas. In contrast to those studies that focus on access-seeking to the Council’s national experts in working groups or the Members of the European Parliament (in the classical understanding of the ‘national’ route; Greenwood 2011), the article looks at groups addressing national governments (ministries, departments) and parliamentarians, parliamentary committees, and political parties. Similarly, instead of focusing on interest groups contacting European media outlets (for the analysis of this strategic choice see for example: Chalmers 2013, De Bruyckers and Beyers 2015), the article focuses on the evidence of groups’ interactions with the national outlets. The second contribution of the article lies in examining access-seeking of interest groups in a number of countries (Germany, the Netherlands, Sweden, the United Kingdom) and types of groups (business, trade unions and non-governmental organizations) within a single, quantitative, large-N design. The input lies in the comparative examination of the factors that influence the behaviour of groups across countries which differ according to a number of criterion: country size, duration of EU membership, varieties of welfare state and capitalism, and the state–interest group model (Esping-Andersen 1990; Hall and Soskice 2001; Lijphart 2012); and across a number of policy areas (20 European directive proposals). Given that earlier studies identified a substantial impact of such structural differences on countries’ policy preferences in EU politics (Ringe 2005; Eising et al 2015), we can potentially expect that they will also be responsible for differences between the activity of groups.
The article is structured as follows. The next section outlines testable hypotheses. Then, the article provides an overview of which domestic actors are addressed in four studied countries? The next section presents the explanatory factors and analyses their impact on the range of domestic horizontal venue shopping. The analysis leads to the conclusion that the type of the national system of interest intermediation remains an influential factors explaining venue shopping. Another important finding is that saliency of the proposals under consideration increases a chance of multi-venue shopping deployed by interest organizations. Finally, the national venue shopping does not entirely resemble the one appearing at the European level. In conclusion, the article brings about the discussion of the results and point to their potential pitfalls and issues remaining for exploration.

**APPROACHING DIFFERENT DOMESTIC ACTORS**

*National context: Corporatist vs pluralist countries, does it matter?*

When describing interest group-state relationship, authors often contrast corporatist with pluralist systems (Schmitter 1974; some authors also add statist system, for those see: Eising 2008, Klüver 2010). Corporatist systems of interest mediation are frequently pointed to as the best examples of systems with high levels of institutionalized integration of interest groups into decision-making processes (Öberg et al 2011). Large employers and employee’s associations have a privileged access to policy-makers, while the rest of groups’ population is excluded (‘insider’ vs ‘outsider’ groups; Grant 2000, Lehmbruch 2000). Pluralist systems have more competitive mode of state-groups relationship, at least in an assumption, providing more equal access to policy-makers for different types of groups (Binderkrantz and Rasmussen 2015, Eising 2004, Eising et al XXX [this issue]). If we distinguish between groups’ status (‘insider’ or ‘outsider’) and their strategic choice (addressing government/parliament or contacting media), it is possible to examine the relationship between privileges conferred on groups and group choices (Maloney et al 1994). In this understanding, corporatism is synonymous with granting a privileged institutional position in contacts with governments to certain interest groups (for similar argument see: Marshall and Bernhagen XXX [this issue]), while forcing the majority of others to use other strategic choices. If the interpretation is correct, we should find support for the following hypotheses:

*H1. The more corporatist system, the more extensive use of non-executive access points by majority of active interest groups.*

The distinction between corporatist and pluralist systems is however challenged by (1) a continuous debate with regard to the usefulness of this distinction and (2) empirical research. In Denmark, a corporatist country, groups traditionally regarded as privileged have complained about being excluded from central decision-making processes and a wider range of groups is being included in governmental hearing processes (Binderkrantz 2005). Studying the British pluralist system, Maloney et al and Page provided evidence that nearly all British interest groups have one or more insider characteristics, which was traditionally associated only with corporatist set ups (Maloney et al 1994, Page 1999). Scholars also observe that we are facing the process of erosion of corporatism, where established patterns of interactions with insider
interest groups are replaced by more *ad hoc* arrangements where governments have opportunities to make selective use of some groups, based on their resources (Christiansen *et al* 2010, Rozbicka and Spohr 2016). The argument goes even further when it comes to the national debates on the European issues. EU multi-level decision-making has impacted state-interest group relations as it created a range of political opportunities allowing groups to bypass national governments, by seeking access to the European level actors (vertical process; Princen 2007, Eising 2008, Beyers and Kerremans 2012). But, it also impacts on horizontal interactions, where interest group interactions with domestic actors start to converge towards the EU, more pluralistic set-up (Falkner 2000). Since all domestic debates are influenced by European level discussions in the relevant policy area, the result should be an adoption of similar patterns of interactions; consequently, nullifying the Hypothesis 1.

**Can saliency of an issue explain venue shopping?**

In the classical interpretation, as discussed above, groups have a repertoire of possible strategies including direct contacts to governmental bureaucrats and parliamentarians and indirect activities such as media contacts (Binderkrantz 2005). An influential assumption in the scholarly literature has been that insider groups (enjoying privileged access to policy-makers; Binderkrantz and Pedersen 2016) limit their access-seeking to just governmental actors and outsider groups are more kin to use indirect strategies of pressure (through media; Grant 2000, Gais and Walker 1991, Jordan and Maloney 1997, Kollman 1998). The indirect strategies (access-seeking through pressure created in the media) are considered a fall-back option for groups excluded from direct access and are instrumental in demonstrating to members or potential members that the group is working actively to promote the group’s goals (Gais and Walker 1991, Jordan and Maloney 1997). Groups with widespread membership tend to choose strategies that will capture the attention of their diffuse membership, thus public interest or cause groups are more likely to seek access to media (Gais and Walker 1991, Maloney *et al* 1994). More recent evidence argues that different strategies are pursued to various degrees, as they are not mutually exclusive (De Bruyckers and Beyers 2015, Binderkrantz *et al* 2014). The implication is that interest groups will show a preference for either direct or indirect strategies, but often will employ both, albeit to a different degree.

Agreeing with those results, this article proposes to push them even further and ask if saliency of the policy under consideration in media outlets could be an independent variable for explaining groups’ contacts with different actors. What if selection of media campaigns (indirect strategy) is not only a result of groups’ characteristic or a system in which they operate, but also the fact that an issue already attracts a large attention in media outlets? Authors agree that when an issue is salient, the traditional structures of policy-making (direct access to policy-makers) become less central and other modes of influence seeking attain more importance (see for example: Binderkrantz 2005, Mahoney 2007, Dür and de Bievre 2007).

The saliency of an issue is linked either to the character of issue under consideration or amount of conflict it generates. When issues are of technical matter, they often exhibit low saliency and groups that are capable of providing expertise on those concentrate their efforts on governmental bureaucracy or parliamentary committees (Maloney *et al* 1994). In contrast, less technical issues wake up interests of larger population of groups that seek access to a larger
variety of venues (potentially aiming at a politization of issues). In case of conflict, the saliency of an issue will rise when there is a number of actors for whom it is important and have opposite positions on it. In order to realise they interests groups will focus on those issues on which they have comparative advantage (Helbling and Tresch 2011, Eising et al 2015). The groups usually disadvantaged in use of insider lobbying strategies will replace them with looking for mass alignment of the public in their favour and more often address media than other actors (Netjes and Binnema 2007). In sum, if saliency is important variable, we should find a support for the hypothesis:

**H2. The more salient the issue under consideration, more actors will address multiple venues. Low saliency of an issue will cause groups to focus on contacting domestic governments and parliaments.**

The saliency consideration in this article puts it aside to the more traditional interpretations of saliency. The European integration scholars, in majority, define saliency as a relative importance of particular issue to some stakeholders (Helbling and Tresch 2011, Netjes and Binnema 2007). In particular Kresi et al (2007) argue that saliency of an issue to an actor will motivate its selection of strategy. Groups worried about interventions at the EU level will approach the EU institutions and those worried about national regulation will address national actors. That, however, shifts the debate to the vertical venue shopping and expands it towards inclusion of not only domestic interest groups, but also European associations, which exceeds merits of this article.

**Effects of the European ‘experience’**

A substantial literature developed within the last decade argues that European level modes of interest representation feed-back into more traditional modes of representation at the national level. A sort of ‘downloading’ process appears (Hix and Goetz 2000). European integration substantially shapes domestic systems of interest representation in terms of: (1) the groups that matter for government (Berkhout et al XXX [this issue]); but also, (2) the strategies groups employ when seeking influence at the national level (Beyers and Kerremans 2012, Eising 2006, Falkner 2000). Following that interpretation, we should expect that activities taken by the groups at the European level should inform strategies at the national level.

The majority of EU policy analysists agree that the EU policy-making is dominated by the executives (e.g. Beyers et al 2015) and is specialised and expertise-based (Beyers et al 2015, Chalmers 2013). At the European level, groups prefer to address the European Commission, due to its role in drafting and legislative monitoring (Greenwood 2011, Tanasescu 2009), as well as, its receptiveness to these type of arguments (Bouwen 2002). By analogy, we should observe similar pattern at the national level – making the national executives the key venue. National governments have a large say in the agenda setting through their involvement in the Council of Ministers and the European Council (Kresi et al 2007). They also benefit from political information (information over preferences and powers of other governments or other supranational actors) and technical information (information about policies’ consequences) (Moravcsik 1994). In particular, for groups which do not have large resources in order to
support their presence at the European level, lobbying the national government seems to be the best alternative. The idea represents a reversed ‘compensation hypothesis’, according to which European access compensates for the lack of domestic access (Beyers 2002). In contrast, the executive branch of government – government agencies, ministries, bureaucrats, members of government – should be a key venue targeted by national interest groups as more significant in the process and most efficient in terms of costs and benefits calculations. That should be especially true for the groups which do not conduct European level lobbying:

**H3. Groups not active at the European level address national governments more often.**

Can we go even further? Number of authors hypothesise that business associations’ ability to supply information and expertise gives them a privileged access to the Commission and the national governments (Dür and Mateo 2012, Binderkrantz and Pedersen 2016, Cekik XXX [this issue]). In contrast, members of the European Parliament and national parliaments are more concerned with ‘political capital’ that helps them to ensure re-election. The re-election concerns make the parliamentarians more receptive to the interests of broader parts of the society, opening a venue for citizen’s groups. That splits the insider tactics in two (Beyers and Kerremans 2012). From the above, we know that lobbying the executive is more characteristic to European level lobbying, thus civil society organizations seems to be in disadvantage. They are often perceived as the weak actors that may need to appeal to the public for lack of other means to influence the political process (Kresi et al 2007). To overcome that they may look into outside lobbying and address media to boost their arguments (see also: Maloney et al 1994). The hypothesis that summarizes this reasoning goes a follows:

**H4. Citizens’ groups address more often national parliamentary actors and media with respect to the European policy-making than businesses.**

This hypothesis should however be kept with a bit of criticism. Binderkrantz (2005), using data self-reported by interest groups, found that there is no clear causality between group types and use of direct/indirect lobbying. She argued that indirect strategies are used by groups of all types to attract members. Kresi et al (2007) further added that use of both strategies is more related to group resources rather than group types; paraphrasing: groups with more substantial resources will go for multiple venues, as multiple tactics are more effective in obtaining influence. A further critical point comes from the studies explicitly focusing on the groups’ interactions with national legislatures. Binderkrantz (2003) argues that interest organizations seeking influence on public decision-making pay increasing attention to the parliamentary actors. Working in particular on Scandinavia, Neergaard (1987) and Rommetvedt (2002) linked it with strengthening of parliament’s position. Can we observe a similar pattern in lobbying on the European matters? The European Parliament became a more important access route, when its co-decision powers were increased (Bouwen 2002, Mazey and Richardson 2001, Wessels 1999). Similarly, the role of the national parliaments in the European policy-making has definitely increased since the Lisbon Treaty giving them a prior scrutiny of legislative proposals before the EU institutions. The power of the national parliaments has been extended since they received the controlling prerogatives with regard to the fulfilment of the subsidiarity principle. While the national parliaments cannot individually block the proposals, their profile raises in the eyes of lobbyists. If that is sufficient to affect lobbying strategies, we should observe a
contrary evidence to the hypothesis H4, regardless of group type, the interactions with the national parliaments feature prominently in the groups’ national lobbying strategies.

DATA AND DEPENDENT VARIABLE

Following the growing trend of quantitative approaches in study of interest groups (Lowery 214, Beyers et al 2014), this article makes use of the extensive INTEREURO database on interest groups politics in Europe (for further information see: Beyers et al 2014, www.intereuro.eu). The empirical analysis builds on data obtained in Germany, the Netherlands, Sweden and the United Kingdom. The data map the lobbying strategies of national interest organizations on 20 of the most salient European directive proposals, between 2008 and 2010 (for details of selection procedure see: Eising et al 2015).

In this particular article, the focus is the national level lobbying on those 20 proposals. Recorded interactions of interest groups with domestic actors include: taking part in the national consultations and workshops on the directive proposals, public hearings, and sending letters to national officials. Those interactions are a matter of public records and they were traced through web mining, direct contacting of national governments and parliaments’ administrations or interviews. Similarly, the evidence of groups’ interactions with the national outlets was measured based on the groups’ appearance in the newspaper articles covering the selected policy developments. The combination of bottom-up (web mining, media) and top-down (public records and interview) sampling ensured inclusion of interest groups which lobbied less frequently than the “usual suspects”.

The full population of interest organizations (1179) active at the national level is spread between (Figure 1): 284 (24.09%) groups in Germany, 298 (25.28%) in the Netherlands, 280 (23.75%) in Sweden, and 317 (26.89%) in the United Kingdom. Businesses and business associations constitute 71.67% of all actors considered, with only 16.71% being citizens groups and 11.62% of trade unions and professional associations. The proportion of the two latter groups to business actors improves slightly in the Netherlands (average 17% for both groups to 65% of business actors) and Sweden (22.86% citizens groups and 10% trade unions to 67.14% business), but even there those types of actors are the majority.

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1 The number consists of 936 unique interest organization and 243 groups which reappeared in a number of discussed policy proposals.
The collected data allows us to organize groups between 7 categories (Figure 2; Appendix: Table 1): those that exclusively approached (1) national governmental actors (56.06%), (2) parliamentary actors (12.89%), or (3) media (13.74%), and those that approached multiple actors, (4) governmental and parliamentary (8.48%), (5) governmental and media (5.85%), (6) parliamentary and media (1.61%), or all three (7) (1.36%). Over 82.7% of the population used only one of the three venues (Figure 2). That makes a strong argument in favour of a statement that multi-venue shopping at the national level is not a preferred tactic. Only one in five groups attempted to address more than one venue. The most often approached venue were governmental actors, addressed by 71.76% of the population. Moreover, even when addressing more than one venue, the most popular combinations were approaching government and one of the other actors (15.69%).

EXPLAINING DOMESTIC VENUE SHOPPING

_Corporatism and pluralism, does it matter?_

As we observed before, the selected countries show a variation in a size and system of interest intermediation. The Lijphart’s index of interest groups pluralism (2012) for the selected countries shows quite a spread, with most corporatist Sweden (0.5) and most pluralist UK (3.38). The corporatism found in Sweden and in a weak version in Germany (0.88) brings the same bias towards economic interests rather than citizens’ groups as compared in more
pluralistic countries, the Netherlands (1.19) and UK (see Figure 1). Thus, the system of interest mediation does not have a larger impact on type of interest groups active in European lobbying. However, the potential relationship exists between the type of system and venue selection (H1; Figure 3). Yet, opposite than predicted in the H1 (more corporatist system, more extensive use of non-executive access points). In the most corporatist Sweden, 94.29% of groups approached governmental actors (86.79% exclusively). While, the multi-venue shopping and addressing non-executive actors was common in the most pluralist UK, with more than a half of groups approaching non-executive actors. The binary logistic regression performed on those two variables (with accessing governmental actors coded as 1 and the rest of actors as 0; and using the Lijphart’s pluralism index) confirms this result: more pluralist the country less likely access to the governmental actors (with logistic regression coefficient -0.65 and odds ratio 0.51; Appendix: Table 2). Moreover, we observe that the pattern of access-seeking to different domestic actors is different per country under discussion. While it could be argued that preference of governmental access points in Sweden, Germany and the Netherlands, creates a pattern to some degree, the results in UK disprove the rule. In order to make this argument stronger (or contradict it), we would need to have more countries included in the study.

**Does saliency of an issue explain venue shopping?**

Media saliency was measured by summing up a number of articles in media outlets. The source of the articles were the following: for Germany - Frankfurter Allgemeine Zeitung and Süddeutsche Zeitung, for the Netherlands - de Volkskrant and de Nieuw Rotterdamse Courant, for Sweden - Svenska Dagbladet and Dagens Nyheter, and for UK – Daily Telegraph and the Guardian. The principles of 2 outlets selection were as follows: the media outlet had to have national coverage, be in top 5 of subscribes number, and preferably represent different political spectrums. The articles were included if they referred to the proposal in their entirety or had a substantial section mentioning the proposal. To simplify, the media saliency was later recoded into 4 categories: (1) no articles, (2) 1-9 articles as minor saliency, (3) 10-23 articles as visible saliency, and (4) all above 23 as very salient. The first dependent variable (addressing multiple venues or not) was constructed as follows: approaching individual venues was collapsed in one category (0) and approaching more than one actor (eg. government and parliament) in a second category (1). The second variable (addressing governmental and parliamentary actors, 1, or not,
0) came up from collapsing original categories and paying a particular attention to exclude any combinations with approaching media (eg. addressing government and media was coded as 0).

There is a positive relationship between variables: an increase in media saliency corresponds to the deployment of multi-venue shopping (bivariate logistic regression coefficient 0.45 and odds ratio 1.56; Appendix: Table 3). Even when controlled for the system or group type, as suggested in existing literature, the media saliency effect on multi-venue shopping is sustained (logistic regression coefficient 0.70 and odds ratio 2.01; with organizations in more pluralist systems deploying less multi-venue shopping, coefficient -0.23 and odds ratio 0.79, and type of group not being a significant variable). That confirms the first part of the H2. The increase in saliency of the proposal at the national arena decreases the likelihood of approaching governmental and parliamentary actors exclusively (bivariate logistic regression coefficient -0.70 and odds ratio 0.49). Similar, controlling for the system and group type, confirms those results (logistic regression coefficient -0.47 and odds ratio 0.62). Consequently, the low media coverage of the proposal under consideration will decreases likelihood of using media as a useful venue (confirming the second part of the H2).

Let’s take the argument a bit further. The tested directive proposals (20) exhibit different media saliency per country. The most salient proposals focused on environmental protection and energy regulation. Contrary to the common perception, the banking giants, Germany and the United Kingdom, also registered the largest saliency within those areas, with the proposals categorised as referring to the banking and finance only second to most salient. The picture becomes even more interesting when we position it against the activity of groups. Against businesses and business associations being the largest group of active actors, majority of actors were registered as active on proposals which relate to environmental and energy regulation (58.95%), which were traditionally areas of citizens groups’ activity (Dür and Mateo 2012). Only 21.37% of the groups were active on topics related to banking, finance and/or domestic commerce, and only further 3.14% on topics related to macroeconomics. These points, and the discussion on the H2, bring us to a conclusion that in the areas like environment and energy (potentially also banking and finance), we should expect larger venue shopping than in other policy areas. Moreover, taken the primacy of business actors in those areas, we can conclude that business actors will be those deploying multi-venue shopping (H4).

**Effects of the European ‘experience’ tested**

Out of all registered interest organizations that were active at the national level only 13.57% lobbied both at the national and European level (Figure 4). European level lobbying in this refers to a record of groups’ submission to the European Commission’s consultations and policy officials indicating that they were approached by group. That particular result confirms earlier studies that indicated the prominence of the national lobbying on the European matters (e.g. Beyers and Kerremans 2012, Binderkranz and Rasmussen 2015, Kresi et al 2007). It also goes against the ‘boomerang pattern’ considered by Keck and Sikking (1998) or Beyers (2002). In their assumption, if the domestic (i.e. national) association fails to realise their goals domestically, it will start voicing its concerns at the European level. However, the results show that only an insignificant number of organizations conduct European level lobbying or both. There is a difference between the countries. Over 10% of actors lobbied at both levels in UK
(21.45%), Germany (18.31%), and the Netherlands (11.07%). At the same time, only 2.5% of Swedish actors mobilised in addition at the European level. Thus, while being more corporatist or pluralist does not explain the degree of mobilisation of interest organizations (H1), it has an effect on the level of mobilisation (European vs national). The argument, however, is not too strong as the score in Germany is counter intuitive.

With rather low activity at the European level, the verification of the H3 (on relationship between lack of activity at the European level and preference towards addressing the governmental actors) is hard to verify. While 71.44% of actors not active at the European level addressed primarily governmental actors, a very similar ratio appears for the actors that were active at the both levels (73.75%; in ttest the mean difference is not significant at the 0.5 level, Appendix: Table 4). We cannot therefore talk here about a significant effect between variables.

What about the distinction between types of organizations and their venue shopping as a leftover of the downloading process (H5)? The results, definitely confirm that, similar as at the European level with the European Commission, the governmental actors are addressed the most often (see Figure 1). Do citizens groups address national parliaments and media more often than businesses, as their alternative? From the previous results, we know that the sample has a bias towards business prominence. Thus, any analysis from now on has to be taken with caution. We also concluded above that businesses are those more likely to develop multi-venue shopping, especially when becoming active on more salient issues (for similar conclusions see: Kohler-Koch and Quittkat XXX [this issue]). As addressing parliamentary actors and media is already an example of the multi-venue shopping, the initial indicators suggest that the H5 can be disproved. The further confirmation comes from the tabulation of group type and groups’ venue selection (addressing parliamentary actors and media, 1; addressing governmental actors, 0; Appendix: Table 4). 46.70% of citizens groups approaches parliamentary actors and media. However, 46.72% of businesses and business associations do exactly the same (in ttest the mean difference is not significant at the 0.5 level). Thus, the difference between two types of groups is not immediately visible.

The look at the group types and their selection of the venue (Figure 5) tells us further that approaching parliamentary actors is not a preferred venue by either of the explored groups. Only 26.40% of citizens groups approach parliamentary actors. Similar situation takes place for trade unions and professional associations (18.25%) and business actors (24.85%). Going even further, citizens groups are those which deploy contacts with national governmental actors quite
often (72.59%). The most interesting result comes from the look at the trade unions and professional associations. 88.32% of them approached governmental actors. The high score of trade unions can be traced to the national system of interest intermediation. More pluralist state, the less likely it is that trade unions and professional associations approach non-executive actors (bivariate logistic regression coefficient -0.56 and odds ratio 0.57; Appendix: Table 5).

![Figure 5. National groups' interactions with three venues per type of organization, percent values](image)

**CONCLUSIONS**

My point of the departure was the observation that, while domestic interest organizations operate in a multi-level system of the European policy-making, we should not abandon studies of purely national interactions. In this contribution, I analysed *interactions of interest groups with their domestic actors* – governmental and parliamentary actors, as well as, media. The leading question focused on *whether groups have preference while addressing one domestic actor above other, and if so what explains variation across national interest groups in their selection of domestic venues when lobbying on European matters?* The focus were three sets of ideas: 1) that classical corporatist/pluralist distinction has limited influence on the venue selection, 2) that saliency of issue under consideration plays a significant role, and 3) that ‘downloading’ processes are a reality.

Based on the data from Germany, the Netherlands, Sweden, the United Kingdom, and on 20 directive proposals, the key findings clearly indicate that the domestic horizontal venue shopping is not a preferred tactic of groups in the national interactions on the European matters. Interest organizations prefer contacts with national governmental actors. Furthermore, and contrary to the hypotheses 1, more corporatist the country, more likely access-seeking to the governmental actors. No matter of the system of interests intermediation, businesses and business associations are dominant actors in lobbying on the European matters at the national level.

The really unique finding focuses on linking the saliency of the policy proposals and groups’ access-seeking. An increase in media saliency corresponds to the deployment of multi-venue shopping (proving the H2). Moreover, the low media coverage of the proposal under
consideration will decrease likelihood of using media as a useful venue. That particular result opens a new venue in studying of the interest organizations’ activity at the national level. A one, very strong contra-argument that has to be taken in consideration is a causality. In this article the assumption was that media saliency causes increased activity of groups. However, we should consider the situation when groups increase the saliency of the proposals by use of tactics like building media presence or conducting media campaigns (including, but not exclusively: organization of press conferences, distribution of press releases, placement of advertisements in media outlets, or directly contacting reporters and journalists to increase media attention; see: De Bruyckers and Beyers 2015). In such situation, the causality of variables has to be questioned. The future research should look closer into this issue.

The assumptions about downloading processes taking place was only partially confirmed. The focus on the European Commission as the executive body at the EU level, reappears at the national level and the preference in contacting the national governmental actors. However, the significant preference of national organizations to mainly lobby at the national level makes remaining inferences weak. Thus, the activity at the European level does not necessarily explain venue shopping (disproving H3). The result suggest that we should expect larger venue shopping on salient policy areas. Moreover, taken the primacy of business actors on the most salient proposals, the article concludes that business actors will be those deploying multi-venue shopping more often than other group types. The increased role of the national parliaments in the European policy-making does not increase their profile as an important venue at the national level. Relationship between group type and venue selection is not strong enough, however it can be argued that if we add system of interests intermediation to the equation, it works for the trade unions.

There is still a number of issues which require further study. The results presented in the article focus on a narrow group of actors (those explicitly lobbying on the European policies), a remaining issue is a comparison if the same strategies are deployed by groups lobbying purely on the national matters. The results presented here cannot be used for making valid inferences on the extent to which domestic interest groups were active on none-European matters (presuming extending research to a larger interest groups population). To repeat earlier point, while some national groups have shifted part of their attention to the EU matters, for many EU policies remain only a minor point of attention (Beyers et al 2015). There clearly has been some EU impact in terms of strategic choices by groups, but the evidence that it is an effect of the European integration is inconclusive. Another issue untouched in the article is an estimate of the lobbying value of each of the venues (for similar concern see: Binderkrantz and Pedersen 2016). Even though the article provides insides in preferential approaching of certain venues by interest organizations (parliamentary actors vs governmental units), we do not know which of them is the most efficient from the perspective of interest groups to realise their interests. We know from the earlier studies that insider tactics are more efficient with regard to the information processing (Beyers 2004), but successful lobbying is not necessary defined only by information recognition. The assumption that access points are of equal value have to be revisited in the future research.
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