Sub national authorities in Europe. Evaluating the informational lobbying strategy of the Dutch provinces in the case of Air Quality policy.

Research by J.H.M. Sistermanns

Radboud University Nijmegen
Faculty of Management
Public Administration (MSc)

Supervisor: Dr. E. Mastenbroek
Preface

Dear reader,

What you are holding is my master thesis, the culmination of 1.5 years hard work. As of now, my master study in public administration is finished. Moreover, after 8 years of studying, my time at the university has finally come to an end. You cannot imagine my happiness.

For me, writing this master thesis was not exactly a walk in the park. I want to thank my supervisor, dr. Ellen Mastenbroek, for her guidance and patience in getting me through this process. I want to thank my girlfriend for keeping my eye on the prize.

Finally, I dedicate this thesis, for what it’s worth, to my parents. Mom, dad, thanks for supporting me in this seemingly never-ending story. It is finally done.

Joep Sistermanns

Nijmegen, July 2016
# Contents

Chapter 1 ......................................................................................................................6
Introduction ...................................................................................................................6
  1.1 Problem definition ...............................................................................................6
  1.2 Research goal and research question ..................................................................8
  1.3 Relevance ............................................................................................................9
    1.3.1 Societal relevance .........................................................................................9
    1.3.2 Theoretical relevance ..................................................................................10
  1.4 An overview of the theoretical framework ..........................................................10
  1.5 A preview of the methodological framework .......................................................12
  1.6 Structure of the report .......................................................................................12

Chapter 2 .....................................................................................................................13
Policy framework .......................................................................................................13
  2.1 The European policy process .............................................................................13
  2.2 The European Commission: organizational structure .........................................15
  2.3 The European Commission: developing policy ....................................................15
    2.3.1 The agenda-setting stage ...........................................................................16
    2.3.2 The policy formulation stage .....................................................................17
    Green papers .........................................................................................................17
    White papers .........................................................................................................17
    Consultation rounds .............................................................................................18
    Impact assessment ...............................................................................................18
    Expert groups .......................................................................................................19
    2.3.3 The end of the European Commission phase .............................................19
  2.4 Summary ............................................................................................................19

Chapter 3 .....................................................................................................................21
Theoretical framework ...............................................................................................21
  3.1 Defining lobbying ...............................................................................................21
    3.1.1 General lobbying .......................................................................................21
    3.1.2 Informational lobbying .............................................................................22
  3.2 The logic of informational lobbying .....................................................................24
  3.3 Types of information ...........................................................................................24
    3.3.1 Technical information ................................................................................26
3.3.2 Preference information ................................................................. 30
3.3.3 The ranking of dependencies ......................................................... 32
3.4 Communication strategies ............................................................... 35
3.4.1 Insider and outsider strategies in general ........................................ 35
   Insider strategies ............................................................................. 36
   Outsider strategies .......................................................................... 36
3.4.2 Insider and outsider strategies in practice ........................................ 38
3.4.3 The degree of effectiveness .......................................................... 40
3.5 Conceptual model ............................................................................ 41
3.6 Summary ......................................................................................... 43
Chapter 4 ......................................................................................... 44
Methodological framework ................................................................. 44
4.1 Evaluative research ......................................................................... 44
4.2 Qualitative research ........................................................................ 45
4.3 Singular case study .......................................................................... 46
4.4 Methods of data collection and analysis ............................................. 47
   4.4.1 Qualitative content analysis ....................................................... 48
   4.4.2 Semi-structured interviews ....................................................... 49
4.5 Operationalization .......................................................................... 50
4.6 Analyzing techniques ...................................................................... 55
4.7 Validity and reliability ...................................................................... 55
4.8 Summary ........................................................................................ 57
Chapter 6 ......................................................................................... 58
Analysis & results ................................................................................ 58
3.1 Case description .............................................................................. 58
3.2 Assessment of the informational lobbying strategy of the Dutch provinces ........................................... 60
   3.2.1. Communicated information types ............................................. 60
      Technical information .................................................................... 60
      Preference information .................................................................. 66
      Other findings on information types ............................................... 70
      Conclusion on communicated information types ................................ 72
   3.2.3 Used ways of communication ................................................... 73
      Used insider strategies .................................................................. 73
      Outsider strategies ....................................................................... 77
Other findings on ways of communication................................................................. 79
Conclusion on the used ways of communication......................................................... 80
Chapter 7. Conclusion & recommendations................................................................ 81
  7.1 Introduction........................................................................................................... 81
  7.2 Main findings........................................................................................................ 83
  7.3 Practical recommendations.................................................................................. 84
  7.4 Reflection.............................................................................................................. 85
  7.5 Recommendations for further research.............................................................. 86
Literature ..................................................................................................................... 89
Appendices .................................................................................................................. 97
  Appendix I: list of respondents.................................................................................. 97
  Appendix II: operationalized theory......................................................................... 99
  Appendix III: findings from analysis.........................................................................108
  Appendix IV: semi-structured interview sheet (lobbyists).........................................113
  Appendix V: semi-structured interview sheet (European Commissioners)...............115
  Appendix VI: document for interviewees.................................................................117
Chapter 1.

Introduction

1.1 Problem definition
The European Union functions according to a system of indirect implementation: because the EU does not have the means or powers to implement its policy on most topics, the individual EU member states are held responsible for this (Mastenbroek et al., 2013, p. 4). European policy is made in sync with national policy, meaning that the implementation, application and enforcement of policy is done by the central and/or subnational governments (Mastenbroek et al., 2013, p. 4). Simultaneously, within this system of indirect implementation, there has been a trend of decentralization in the Netherlands. Since 2010, as much policy as possible is delegated to the subnational governments. In general the Dutch municipalities, regions and provinces are affiliated with all the policy problems that do not necessarily have to be assessed on a national level. (“Bestuursakkoord 2011-2015”, 2011)

As a result, in the case of the Dutch provinces, the majority of the policy that they need to carry out is initially made at the EU-level, and it is expected that the European influence on their policy will only increase (Hessel, 2003, Guderjan, 2012; Mastenbroek et al., 2013;). Currently, around three quarters of the EU legislation is implemented at the subnational level (Moore 2008, as cited in Mastenbroek et al., 2013). In decentralized policy fields like environmental policy and nature legislation, the influence of EU rules is substantial. EU directives apply directly for local governments in case nationals or regional governments have not transferred them into domestic law (Guderjan, 2012). The provinces have increasingly become enforcers of EU law, especially in the case of regional environmental policy (Mastenbroek et al., 2013). Air quality, nature law, water management and climate policy are typical provincial dossiers anno 2015 (Interprovinciaal Overleg, 2014).

At the same time, the provinces play a minor role in the EU legislative process and they have very little say in the preparation phase of the EU policy process. In the EU legislative process, the formal key players are the European Commission, the European Parliament, the Council of Ministers and to a lesser extent the national governments of EU member states (Hessel, 2003; Wallace et al., 2010). Subnational governments do not receive a role of substance. Although they acquired an advisory role within the Committee of Regions in 1994,
the formal influence of the Dutch provinces in the European policy process is limited (Hessel, 2003). This produces a paradox, since it is in fact very important for the provinces to be involved and to exert influence in the EU policy process.

In order to implement EU policy in the right way, the provinces need to have a good understanding of the EU policy that is made, especially since the implementation of EU policy can have very specific negative consequences. Not only can wrongful implementation lead to reputation damage; the provinces can also suffer financially. Civilians and companies can go to trial when they are affected by incorrectly implemented provincial policy and if the provinces are held accountable for their losses, they will have to financially compensate them (Goedings et al., 2010). Furthermore, with the adoption of the NErpe law in 2012 (“Wet Naleving Europese regelgeving publieke entiteiten”, 2012) it has become possible for the Dutch national government to intervene in the practices of the provinces when they do not implement EU policy correctly, and even sanction them financially if need be. (Knook, 2010, as cited in Mastenbroek et al., 2013). Moreover, a passive role from the provinces in the EU policy process can lead to unwanted, problematic or even irreversible policy, along with negative financial and administrative consequences (Mastenbroek et al., 2013, p. 15).

When policy is already formulated and imposed by the EU, however, it is too late to change it. In general it is important for Dutch sub national governments to influence the EU policy process, in order to make the EU policy outcomes resemble their subnational preferences. The more EU policy resembles the wants and needs of subnational governments, the less trouble they will have with implementation. Finally, the implementation of EU policy can also be used to one’s advantage. By wielding influence in the EU policy process, one can create opportunities: the provinces can for example influence EU subsidy programs to their advantage, or get policy topics on the agenda that they regard as priorities. (Goedings et al., 2010a; Guderjan, 2012; Mastenbroek et al., 2013).

Summarizing the former, it is important for the Dutch provinces to be involved in the EU policy process and to exert influence in it, they have very limited formal opportunities to do so. This paradox is problematic, especially considering the expected increase of EU influence on provincial policy in the future and the constant risks of negative consequences in case of unwanted policy or wrongful implementation of policy.

Responding to this problem the provinces have, like other subnational authorities, companies and NGOs affected by Brussels, searched for ways to influence the European policy
process. They found these ways in the form of lobbying. Over time the provinces have developed a specific and detailed informational lobbying strategy in order to optimize their influence in the European policy process. The provincial informational lobbying strategy is not perfect, however, and there is a permanent need to improve the informational lobbying strategy, given the ever changing European playing field and the vast amount of lobbying opponents in Brussels (Coen, 2007; Van Schendelen, 2007).

The provinces, in other words, face an unremitting knowledge problem. They need to keep developing and improving the ways in which they operate in the European policy process, in order to face their competition in Europe and have the best chance to exert influence in the European policy process, and they need to keep improving their informational lobbying strategy. This knowledge problem is tackled in this thesis.

1.2 Research goal and research question
The goal of this research is (1) to make recommendations for the Dutch provinces to improve their informational lobbying strategy, so they are expected to wield more influence in the European Commission phase of the European policy process in the future; and (2) to contribute to the little existing theory on informational lobbying by sub national authorities by critically assessing it, combining it and formulating a thus far non-existent evaluative framework on informational lobbying.

These goals will be reached by

- giving an overview of the necessary types of information that interest groups need to provide to the European Commission in the European Commission phase of the European policy process, and by assessing the use and presence of these information types in the actual provincial lobbying activity in the European Commission phase of the European policy process.
- Also, attention will be given to the communication strategies that are used to communicate the lobbying information. This will be done through qualitative, process-evaluative research.
In line with the above, the research question of this thesis will be as follows:

*How can the Dutch provinces improve their informational lobbying strategy in the European Commission phase of the European policy process?*

In order to answer this question, the following sub questions are in order.

I. *How does the EU policy cycle work, and how does the European Commission develop policy?*

II. *What is informational lobbying?*

III. *What are the theoretical preconditions of an effective informational lobbying strategy, concerning information types and ways of communication?*

IV. *To what extent does the informational lobbying strategy of the Dutch provinces meet the theoretical preconditions of an effective informational lobbying strategy?*

1.3 Relevance

1.3.1 Societal relevance

This research has societal relevance, because improving the provincial informational lobby contributes to the provinces gaining influence in the European policy cycle. Better lobbying strategies lead to more influence in the European policy process, which leads to fewer “unpleasant surprises”, a lower chance of getting financially sanctioned and more opportunities to influence the European policy process to provincial advantage. Money can be saved through the prevention of implementation problems and financial sanctions, and general implementation ease. Moreover, money can be made through the influencing of subsidy programs. This research will thus favor the Dutch provinces and ultimately Dutch society, since it is society that pays for the provinces through taxes, and it is society that should benefit from a well-functioning government in the first place. Furthermore, the evaluative model that is formulated can also be used to evaluate and improve lobbying activity in other cases besides Air Quality (which is the case that is examined in this thesis).
Finally, this research has great value for the actual actors that are involved in lobbying on behalf of the Dutch provinces. Not only will they gain insight in how they should act in order to lobby (more) successful. This research will also provide a better understanding of the EU-lobbying process, general EU governance and the dynamics of influence.

1.3.2 Theoretical relevance

The academic literature provides multiple strategies on how to influence the European policy process. Several articles have been written on how to gain access to and in turn influence the European institutions; on general lobbying; on pressure-based lobbying; on informational lobbying, on coalition building and on the importance of networking (Bouwen, 2002, 2004; Coen, 2007, 2009; Gullberg, 2013; Klüver, 2013; Goedings et al., 2010). This literature however is rarely combined and it mostly concerns the ways in which national governments and large international companies (can) exert influence in the EU policy process. There is less known about the ways in which subnational authorities (can) exert influence in the European policy process. This thesis fills this knowledge gap. Also, this thesis contains an evaluative framework that can be used to examine informational lobbying efforts of sub national authorities. Such an evaluative framework does not yet exist, making this research theoretically relevant.

1.4 An overview of the theoretical framework

This thesis focuses on informational lobbying: lobbying through the provision and distribution of informational content (Lohmann, 1995) and/or specialist information (Austen-Smith, 1993) by interest groups to decision-makers (Broscheid & Coen, 2003), without any contingent punishments or rewards from the providing interest groups (Gullberg, 2013), in order to influence policy formulation and decision-making in the European policy process of the European Union (Zibold, 2013; Gullberg, 2013).

The key to understanding the logic behind informational lobbying activities in the European Union is to conceive the relation between interest groups and the European institutions as an exchange relation between interdependent organizations. The European institutions need information in order to develop new policy, because they themselves do not have the time and resources on their hands to gather it. Interest groups, on the other hand, have
the time and resources and therefore can provide the needed information. Their wish is, in turn, to influence the formulation, development and decision-making process of the new policy (Bouwen, 2002; 2004). The providing of information to the European Institutions gives the interest groups a chance to influence the new policy, as policy-makers ‘are often imperfectly informed about the consequences of various policy alternatives for the wealth and well-being of their constituencies’ (Lohman, 1995, p. 268). Because of this, lobbying through the provision of informational content can have an impact on political decisions (Lohmann, 1995, p. 267).

According to the literature, there are several types of information that the European institutions need in order to develop and formulate policy. In this thesis, a difference is made between technical and preference information. Technical information here is defined as highly technical, scientific, objective and data-driven information (Chalmers, 2013; Broscheid & Coen, 2003), needed in order to understand the market (Bouwen 2002, 2004) and develop sound and effective political and legal initiatives (Gornitzka & Sverdrup, 2008). Preference information, secondly, is defined as information about public and private support as well as normative/value-laden claims (Chalmers, 2013; Bouwen, 2002, 2004), needed to identify the range of possible and acceptable political initiatives and solutions within the EU (Gornitzka & Sverdrup, 2008). Both information types can be further categorized, following different authors.

Furthermore, in the lobbying literature, scholars write about lobbying strategies, tactics, and ‘techniques of exercising influence’ (Schlozman & Tierney, 1983, as cited in Opfer, 2001, p. 141). All of these terms are used to describe ways to communicate information to the European institutions, and hereby exercise influence. Schlozman & Tierney (1983, as cited in Opfer, 2001, p. 141) make a difference between access-requiring tactics and non-access requiring tactics. Later authors have adopted this categorization under a different name: insider and outsider strategies. This categorization is now the most used one in lobbying literature (Kollman, 1998; Broscheid & Coen, 2003; Eising, 2007; Dür & Mateo, 2010; Chalmers, 2013) and can also be further categorized, following different authors.

Finally, based on the mentioned literature, this thesis provides preconditions of an effective lobbying strategy. It is argued that in order to lobby effectively, all types of information should be communicated, and despite ‘protest politics’, all possible ways of communication should be used to get these information across.
1.5 A preview of the methodological framework
As mentioned before, this research assesses the information lobbying strategy of an interest group in the European Commission phase of the European policy process through qualitative, evaluative research. In evaluative research, one can evaluate a plan, a process or a product (Verschuren & Doorewaard, 2007). In this thesis, a process evaluation is in place. The process of informational lobbying, and its effectiveness in the particular case of the Dutch provinces regarding Air Quality, is assessed. The reason for process evaluation, and not a product evaluation, is the fact that lobbying success is very hard to assess and measure objectively. As employees of the House of the Dutch Provinces (HNP) have stated: interest groups can come to see their interests represented in the formulation of European policy, but they cannot be sure that this is the result of their used lobbying strategy. There are too many other lobbying parties involved, and there are in general too many other factors in play (politics for example, personal beliefs, back-room politics) which make it difficult to assess the impact of a lobby (personal communication, lobbyist B).

Process evaluation, on the other hand, is possible (Verschuren & Doorewaard, 2007). Based on literature the necessary informational types of a theoretical informational lobby can be formulated, and these criteria can be checked in a real life situation. This is done in this research. After collecting the necessary theoretical information, and composing the evaluative framework, the different criteria will be assessed in the provincial lobbying case of Air Quality. The necessary information on this Air Quality case will be gained through document analysis and semi-structured interviews. This means that in this singular case study, triangulation of methods is in place (Bleijenbergh, 2013).

1.6 Structure of the report
In the next chapter of this thesis, the European policy process is described, along with the European Commission phase of the European policy process, and the role of the European Commission. In chapter three, the theoretical framework follows, containing the evaluative framework of this thesis. In chapter four, the methodology used in this thesis is justified and the used theory is operationalized. In chapter five, the studied case of Air Quality is described, the provincial informational lobbying activity is assessed and analyzed and results are reported. In chapter seven, a conclusion is given, containing a summary of the conducted research, a report of the main findings, along with a recommendations for further research and reflection on the done work.
Chapter 2.

Policy framework

As explained in the introduction of this thesis, this study evaluates the informational lobby of the Dutch provinces in relation to the European Commission, in the so-called European Commission-phase of the European policy cycle. In order to understand, put into context and evaluate this informational lobby, it is important to understand how the European policy cycle works; what the European Commission is and how it functions; and how it develops new policy.

2.1 The European policy process

How is new European policy developed? In general, in terms of analytical stages, the EU policy process can be described as a process of agenda setting, policy formulation, decision making, policy implementation and evaluation (Wallace, 2010). The most important actors here are, in order of appearance, the European Commission, the European Parliament and the Council of Ministers.

The development of new policy starts with the European Commission, who sets the agenda by deciding which policy topics deserve attention. The European Parliament and the Council of Ministers, as well as national governments, the Committee of Regions and individual interest groups, can communicate their wishes and suggestions on new policy, but in the end it is the European Commission that decides on which subject matter policy will be made or revised. This is called the right to initiate policy (Van Schendelen, 2007; Wallace, 2010).

When the policy agenda is set, the policy formulation stage starts. Again, the European Commission is of central importance here. It is the European Commission that, after deliberating at will with other parties (the ‘consultation phase’), formulates a policy proposal (Van Schendelen, 2007; Wallace, 2010). When this policy proposal is finished, it is formally sent to the European Parliament, the Council of Ministers, the Member States’ national parliaments, the Committee of Regions and the European Economic and Social Committee (Van Schendelen, 2007; Wallace, 2010). The national parliaments can force the European Commission to reconsider their policy proposal when at least a third of the national parliaments (the yellow card procedure) and in the best case a simple majority of the parliaments votes so (the orange card procedure), but this hardly ever happens. The Committee of Regions and the European
Economic and Social Committee in particular cases get a formal chance to communicate what they think of the proposal, depending on articles 301 to 307 of the Treaty of the European Union.\(^1\) (European Commission, “Ordinary legislative procedure. Step by step”)

The European Parliament and the Council of Ministers, in contrast to the institutions mentioned above, can actually alter the Commission’s policy proposal. Through a process of back-and-forth deliberation, they may discuss and amend it – Wallace calls this the decision-making phase (Wallace, 2010). Although both the European Parliament and the Council of Ministers can discuss and amend proposed policy, a policy proposal only becomes formal law when the Council of Ministers, consisting of national government ministers that are relevant to the proposed new policy, gives its approval (McGormick, 1999).

When the Council of Ministers agrees to a new policy, the decision-making stage of the European policy cycle comes to an end. After this, the new policy gets implemented in the several Member States by either the national governments or subnational governments (the implementation stage), depending on the institutional design of the different Member States and their agreements about implementation. Years after its implementation, the policy gets evaluated (the evaluation stage). This is again done by the European Commission (European Commission, “Trade”). It marks the end of the European policy cycle.

---

\(^1\) ‘The Economic and Social Committee (ESC) and the Committee of the Regions (CoR) must be consulted by the Commission and the Council on certain issues or when the Council considers it appropriate. For example, the ESC must give its opinion on economic and social policy and the CoR must be consulted on environment, education and transport. The Council or Commission can set a time limit for the submission of opinions. The European Parliament also has the option of consulting the two Committees. In addition, the Committees can issue opinions on their own initiative.’ (European Parliament, ‘Ordinary legislative procedure’)}
2.2 The European Commission: organizational structure

In order to research the way the Dutch provinces lobbied the European Commission, it is important to know how the European Commission is set up. The European Commission is one of the most important institutions of the European Union: it sets the policy agenda by using its right to initiate policy, it defines spending programs, it monitors national implementation of EU rules and programs, it negotiates on behalf of the EU in external economic relations and in some areas it develops cross-EU expertise (Wallace, 2010, pp. 73-74). The European Commission consists of a political-executive part and an administrative part. The political-executive part is to be found in the College of Commissioners. The administrative part can be found in the Directorate-Generals, or ‘the Services’ (Nugent, 2001). These will be discussed below.

The College of Commissioners consists of 28 members, one for each member state. It steers the direction in which European policy is going on certain topics and decides on new policy proposals (Wallace, 2010, p. 71; Nugent, 2001, p. 7). Members of the College of Commissioners work closely together with cabinets, i.e. their private offices, with officers that act as their eyes, ears and voice inside the European Commission and other European and (sub)national institutions (Wallace, 2010, p. 71).

‘The Services’ consist of approximately 40 Directorate-Generals and serve as the administrative workforce of the European Commission. Each Directorate-General consists of Directions and Units (Wallace, 2010). They are each responsible for a specific policy topic and headed by a Director-General, who is in turn accountable to ‘his’ Commissioner. When a policy issue transcends the scope of a singular Directorate-General, and several Directorate-Generals thus have to work together, one of them is appointed leading officer. In general, most of the EC policy issues require coordination between several DGs (Wallace, 2010; Nugent, 2001, p. 143). Finally, the various DGs are quite compartmentalized and, as a consequence, they are the most logical to address if an interest group would want to lobby the European Commission on a specific policy terrain (Mastenbroek et al., 2013).

2.3 The European Commission: developing policy

In this thesis, the agenda-setting stage and the policy formulation stage of the European policy cycle are together defined as ‘the European Commission phase’. The European Commission phase starts with the process of agenda-setting and ends when a policy proposal is formally sent to the European Parliament and the Council of Ministers (and possibly the Member States’
national parliaments, the Committee of Regions and the European Economic and Social Committee).

The most important reason to focus on the European Commission and the related European Commission phase is the fact that there is general consensus in literature that it is 1) the most beneficiary for interest groups to lobby the European Commission in the earliest stages of the European policy process, and 2) the most influence can be exerted before the European Commission has published a policy proposal (Klüver, 2011).

Below, the European Commission phase is described in detail, in chronological order, discussing the agenda-setting stage and the policy formulation stage, including possible moments of influence.

2.3.1 The agenda-setting stage
As mentioned before, the European Commission has the sole right to initiate policy, enabling it to set the agenda of the European Union (Bouwen, 2009; Wallace, 2010; Van Schendelen, 2005; Nugent, 2001). There are several reasons why a policy agenda gets on the agenda of the European Commission. The European Commission can decide what is important based on their own ideas and expertise, or policy can be the result of an update or evaluation of previously made policy. Up to 20 to 25 percent of newly initiated policy serves as a follow-up of resolutions provided by the European Council or the Parliament, or is a response to requests from social partners of the EC and/or related economic actors (De Lange et al., 2015). Sub national authorities like the Dutch provinces can influence the European Commission to set the agenda, through the European Parliament or the Committee of Regions, or by lobbying solely. According to article 11 of the Treaty of the European Union, the European Commission is formally bound to be open to commentary on all aspects of European Union action and to be open to dialogue with the parties involved (De Lange et al., 2015, p. 63).

When a new European Commission is installed, a ‘thematic strategy’ gets published, roughly explaining the plans of the Commission for its upcoming term. These strategic plans are formulated in more detail in so-called work programs, which are published at the beginning of every year. When it comes to agenda-setting, the thematic strategies and work programs are very important, because they give a general idea of which policy issues are going to be addressed (www.europa-nu.nl). For example, every work plan contains the newly planned policy initiatives of the Commission, ideas it is considering and a list of initiatives that are
already in play (Mastenbroek et al., 2013, p. 23). The thematic strategies and the related work programs make clear on which subject the European Commission is focusing, and on which subjects the different interest groups therefore should focus in their lobbying activities.

2.3.2 The policy formulation stage
When policy is put on the agenda of the European Commission, the policy formulation phase starts, if at all. The policy formation phase takes place through the publication of green papers and white papers, internet consultations/questionnaires, expert groups and impact assessments. A big part of the policy formation phase is consultation. According to the website of the European Commission, ‘public consultations with stakeholders and interested parties are the main channel for collecting the evidence and opinions needed to produce proposals suitable for an EU made up of 28 countries, to test out ideas and to build consensus’ (“European Commission, “Commission At Work”). Based on the Treaty of the European Union and article 2 of its accompanying Protocol, the European Commission is obliged to consult broadly with actors that are affected by new policy (De Lange et al., 2015, p. 66). Below, the events that define the policy formulation stage are listed.

Green papers
The publication of a green paper is the first important event in the policy formulation stage of the European Commission phase. In a green paper, the European Commission explains the current status of a certain policy issue, and it makes recommendations on how the policy regarding this issue should be developed in the future. Green papers also serve as a call for discussion and invite governments and other actors to react on it and spill their own ideas. The green papers are often the first substantial initiatives of new policy proposals (Europa Nu, “Groenboek”). Moreover, green papers serve as focal points: after their publication, policy actors can react to them through position papers (Goedings, 2010a;2010b).

White papers
After one or multiple green papers, the European Commission publishes so-called whitepapers. White papers are documents in which the European Commission formulates more concrete policy proposals, as opposed to the less concrete and less definitive policy recommendations that are formulated in green papers. In white papers, concrete to-be-achieved goals are formulated, as well as the ways to achieve these goals. Generally a first draft of the policy
proposal is also published, with accompanying legislation. As is the case with the green papers, the white papers are meant to ignite discussion. With their publication, the European Commission invites member states, policy actors and even citizens that are involved in the policy field or affected by the formed policy to react. Again, this most of the time happens through position papers.

The European Commission renders the reactions on white papers to be very important and takes them into account before continuing the European Commission phase (Europa Nu, “Witboek”). Because of this, the white papers and the opportunity to react to them serve as important focal points. Still, there is a downside: as policy gets more and more specified, it becomes harder to influence (Mastenbroek et al., 2013).

**Consultation rounds**
Consultation rounds are consultation procedures in which multiple interest groups can partake. Open consultations are typically consultations and questionnaires on the internet and open for everyone to join, as opposed to expert groups and closed committees (European Commission, “Open Consultations”). According to De Lange et al. (2015), open consultations have substantially less influence on the policy formation process. Open consultations are focal points, and very accessible ones as well, but they are not as useful as the others. Closed consultation rounds are consultations in which for example only stakeholders, or only relevant companies can partake – the European Commission here decides on who may or may not participate. Closed consultation rounds also often take place on the internet (ECORYS, 2013).

**Impact assessment**
Impact assessments are performed mainly by and within the European Commission as a means to find out which social, economic and/or environmental effects new policy will have. According to the Treaty of the European Union, the European Commission should take concerned parties into account when writing an impact assessment, and according to Mastenbroek et al. (2013), the European Commission indeed approaches the concerned parties in order to get necessary information.

De Lange et al. (2015) nuance this view, however. According to their report, regions and subnational authorities are scarcely consulted. Moreover, the results of impact assessments, as well as the subsidiarity and proportionality checks, are classified until the policy proposal in question is published and sent to the European Parliament and European Council (De Lange et
al., 2015). This all leads up to a view of impact assessments as focal points that are not that useful - at least not for regions and subnational authorities. When interest groups are not asked to participate in the impact assessment, it is probable that they will not get a chance to do so in any way. Nonetheless, subnational authorities can provide the Commission with information about their intended way to implement policy, especially when it is known or expected that the European Commission is or will be concerned with an impact assessment (De Lange et al., p. 67).

**Expert groups**

The European Commission forms expert groups early in the policy formation phase. Expert groups are meant to advise the Commission on new policy and its legislation. They also monitor, coordinate and control the cooperation with member states in the European legislative process. Expert group members are typically scientists, (sub)national policy specialists, representatives of NGOs and company officials. They stem from several countries and its members are appointed by European Commissioners or Directorate Generals. It is also possible for governments or organizations to delegate someone. Expert groups can themselves invite experts to join them as well (Europa Nu, “Expertgroep”). It is useful for an interest group to have one of their members seated in an expert group, as the interest group can communicate its policy preferences in a direct manner, and thus influence the policy process.

**2.3.3 The end of the European Commission phase**

The European Commission phase ends when the European Commission officially publishes a policy proposal and sends it to at least the European Parliament and the Council of Ministers. This marks the end of the European Commission phase. A policy proposal consists of a text proposing new policy, or proposing alterations of existing policy and is often accompanied by annexes with legal text and proposed implementation procedures.

**2.4 Summary**

In this thesis, the European Commission phase of the European policy process is researched. In the European Commission phase, the European Commission stands central, as it has a pivotal role in designing and developing new policy. In the agenda-setting phase of the European
Commission phase, the European Commission puts the plans to make or alter policy on the agenda. In the consultation phase of the European Commission phase, the European Commission deliberates with numerous stakeholders in order to make or alter policy in the best possible and most representative manner. It is in this part of the European Commission phase that a lot of lobbying is typically done. The European Commission phase comes to an end when the European Commission sends a concrete policy proposal to the European Parliament, the Council of Ministers and the Committee of the Regions.
Chapter 3

Theoretical framework

This chapter describes the different aspects of informational lobbying. Firstly, the terms lobbying and informational lobbying are defined and combined in order to come up with a detailed, workable definition that will be used in the remainder of this thesis. Then, the logic of informational lobbying is explained: how does informational lobbying lead to influence, and why is it important? After this, the different information types that interest groups can and should provide in order to exert influence are described, as well as the different strategies and tactics that can and should be used to communicate this information, in order to exert influence. The chapter is concluded with a conceptual model of the theory.2

3.1 Defining lobbying

3.1.1 General lobbying

In lobbying literature, the term ‘lobbying’ is defined in multiple ways. The Council of Europe defines lobbying as ‘a concerted effort to influence policy formulation and decision-making with a view to obtaining some designated result from government authorities and elected representatives’ (Zibold, 2013, p. 1). Although this definition is very broad, it is clear. What actual lobbying consists of in practice, however, is less easy to derive from this. The EP-Commission Transparency Register is helpful here. They define lobbying activity as ‘all

2 It is important to note that the majority of the used literature in this chapter is not based on studies about the informational lobbying activities of sub national authorities in the European Commission phase. The majority of the theory about information types, for example, is found in studies about the informational lobbying of business interests. Only one article assesses the lobbying of public interests, and in this case the public interest concerns member states’ national governments, and not sub national authorities. This also is the case in the described theory on the ways of communication of information. This does not mean that the findings in these articles are not useful for research on the Dutch provinces, however. The articles presented in literature explain which types of information the European Commission needs and desires, and which types of information interest groups should supply. Sub national governments like the Dutch provinces can be seen as one of the many interest groups, for that matter, and the information that the European Commission needs counts as a given. The presented findings are thus not limited in applicability.
activities carried out with the objective of directly or indirectly influencing the formulation or implementation of policy and the decision-making process of the EU institutions, irrespective of the channel or medium of communication used’ (EP-Commission Transparency Register, as cited in Zibold, 2013, p. 2). These activities include ‘contacting Members, policy officials or other staff of the EU institutions; circulating information material and organizing events for which invitations have been sent to Members, officials or other staff of the EU institutions’ (EP-Commission Transparency Register, as cited in Zibold, 2013, p. 2). Finally, ‘voluntary contributions and participation in formal consultations on envisaged EU acts and other open consultations’ are seen as a specific part of lobbying by the EP-commission (EP-Commission Transparency Register, as cited in Zibold, 2013, p. 2).

Gullberg (2013) defines lobbying in a similar way. General lobbying is defined as ‘an interest groups’ contact with, and activities directed at, decision makers in an attempt to influence public policy’ (Gullberg, 2013, p. 612). This definition includes contact made through both institutionalized and noninstitutionalized participation in the policy making process, and also activities such as conferences, advertisements, and efforts to influence policy through the media (Gullberg, 2013, p. 613). To be exact, institutionalized participation includes formal hearing processes and meetings, and noninstitutionalized participation includes informal meetings with bureaucrats and politicians – for example employees in the Commission or members of the European Parliament (Gullberg, 2013, pp. 612-613).

As the aforementioned authors make clear, the general definitions of lobbying concern activities and efforts to influence policy formulation and decision-making in the European Union policy process. In these general definitions, the importance of information is not very evident: the role of information is only briefly mentioned in the definition of the EP-Commission Transparency Register. When one assesses lobbying theory in more detail, however, the importance of information as a part of it becomes clear.

### 3.1.2 Informational lobbying

Up until the 1990s, scholars regarded lobbying as ‘a straightforward quid-pro-quo exchange of money in return for favorable political decisions’ (Lohmann, 1995, p. 267). In the 1990s, however, another view of lobbying emerged. In this complementary view on lobbying, interest groups not only lobbied through the exchange of money, but also through the exchange of information. Potters & Van Winden define lobbying as ‘the use by interest groups of their (alleged) expertise or private information on matters of importance for policymakers, in an
attempt to persuade them to implement particular policies’ (Potters & Van Winden, 1992, p. 269).

Austen-Smith (1993) defines lobbying as a way to influence policy, which can be done in two ways: by giving of campaign contributions and by distributing specialist information (Austen-Smith, 1993, p. 799). Austen-Smith adds that these two ways of lobbying are related to one another. The giving of campaign contributions serves as a means of securing the attention of the relevant policy maker, and the transfer of relevant specialist information serves as a means to exert influence on the content of new policy (Austen-Smith, 1993, p. 799).

In line with Lohmann (1995) and Austen-Smith (1993), Broscheid & Coen (2003) define lobbying as an interaction between lobbyists and policy-makers. They argue that two different kinds of lobbying can be distinguished: pressure-based lobbying and informational lobbying (Broscheid & Coen, 2003, p. 169). In pressure-based lobbying, influence is the result of resources that lobby groups can grant or deny (Broscheid & Coen, 2003, p. 169). In informational lobbying, influence relies on ‘the sometimes selective and partisan provision of information by interest groups, and the strategic interpretation of such information by decision-makers’ (Broscheid & Coen, 2003, pp. 169-170).

The most recent scholar to elaborate on lobbying as a two-faced phenomenon is Gullberg (2013). She defines pressure-based lobbying as ‘lobbying through threats, defined as contingent punishments or rewards that are applied by the interest group itself’ (Gullberg, 2013, p. 614). Important forms of this lobbying kind include the threat to withdraw capital or voter support and in general, it is only executed by large multinational business interests, or very powerful international alliances of Member State governments (Gullberg, 2013, p. 614). Information-based lobbying is a kind of lobbying that is widely used by all kinds of interest groups, may they be subnational authorities, national governments or international companies. Gullberg defines it as ‘lobbying through transmission of information without any contingent punishments or rewards’ (Gullberg, 2013, p. 614).

It is clear that there is a distinction in literature between pressure-based lobbying and informational lobbying. This thesis focuses on informational lobbying: lobbying through the provision and distribution of informational content (Lohmann, 1995) and/or specialist information (Austen-Smith, 1993) by interest groups to decision-makers (Broscheid & Coen, 2003), without any contingent punishments or rewards (Gullberg, 2013), in order to influence policy formulation and decision-making in the European policy process of the European Union (Zibold, 2013; Gullberg, 2013). In line with this, an informational lobbying strategy consists
of two things in this thesis: informational content and ways of communication that are used to distribute this informational content.

3.2 The logic of informational lobbying

In the previous, the different kinds of lobbying have been defined, with a focus on informational lobbying. The question why informational lobbying is so important, is answered in this section.

According to Bouwen, the key to understanding informational lobbying in the European Union is to see the relation between interest groups and the European institutions as ‘an exchange relation between interdependent organizations’ (Bouwen, 2002, p. 368). The European institutions need information in order to develop new policy, because they themselves do not have the time and resources to gather it. Interest groups, on the other hand, do have the time and resources and therefore can provide the needed information. Their wish is, in turn, to influence the formulation, development and decision-making process of the new policy (Bouwen, 2002; 2004a; 2004b; Chalmers, 2013). The providing of information to the European Institutions gives the interest groups a chance to influence the new policy, as policy-makers are often ‘imperfectly informed about the consequences of various policy alternatives for the wealth and well-being of their constituencies’ (Lohmann, 1995, p. 268). Consequently, lobbying through the provision of informational content can have an impact on political decisions (Lohmann, 1995). Moreover, in the words of Klüver, ‘it is generally argued that decision-makers need external information and that interest group influence increases with the amount of information they can supply’ (Klüver, 2012, p. 492).

In sum: by providing information to legislators, interest groups can influence the development and formulation of new EU policy. The different types of information that the European Commission needs, and that interest groups in turn can communicate to the European Commission in order to do exert influence, are discussed in the next paragraph.

3.3 Types of information

The literature states several information types that the European institutions need in order to develop and formulate policy. In this paragraph, these different information types will be defined. Finally, the ranking of dependencies is explained: the degree to which the information types are important to the European Commission.
In general, scholars broadly distinguish between two types of information: expert/technical information, and politically salient/preference information (Chalmers, 2013). First of all, according to Ainsworth (1993, p. 52), expert/technical information defines as ‘highly technical, scientific, objective and data-driven information’ (Chalmers, 2013, p. 46; see also Ainsworth, 1993). Second of all, according to Mahoney, politically salient information defines as information about public support as well as normative and/or value-laden claims (Mahoney, 2008, as cited in Chalmers, 2013, p. 46).

Similarly to Ainsworth and Mahoney, Bouwen (2002; 2004) distinguishes between expert information and information on the domestic and European encompassing interests. Bouwen (2002; 2004; 2009) states that his version of technical information, expert knowledge, regards ‘the expertise and technical know-how required from interest groups in order to understand the market’, ‘for example the technical expertise provided by Barclays Bank to help EU officials understand the particularities of the capital adequacy rules for commercial banks’ (Bouwen, 2004, p. 340). The information about the Encompassing Interests relates to the ‘aggregated needs and interests of a sector’ in the domestic and/or European markets (Bouwen, 2002, p. 340). These types of information will be discussed in detail, later in this chapter.

Furthermore, Broscheid and Coen (2003) speak of technical information, in the form of substantive expertise, and information on the preferences of relevant actors in the several member states. They argue that both types of information address the question if a policy proposal works, i.e. ‘if it will have a desirable outcome and if it will be acceptable to the actors involved in the political decision process’ (Broscheid & Coen, 2003, p. 170).

Gornitzka & Sverdrup (2008) concur with the aforementioned authors: they state that on the one hand, the European Commission depends on ‘relevant and timely substantial information, in order to develop sound and effective political and legal initiatives in numerous areas, some of which are highly technical, posing high demands on the level of expert knowledge’ (Gornitzka & Sverdrup, 2008, p. 1). On the other hand, information is important in order to identify the array of possible and acceptable political initiatives and solutions within the EU (Gornitzka & Sverdrup, p.1). Information on the preferences and positions of Member States, information about the needs and interests of societal actors, information on whom is likely to oppose new policy, as well as academic expertise is all important for the Commission in order to fine-tune their proposals (Gornitzka & Sverdrup, 2008, p. 1).
Based on the aforementioned authors, a difference is made between technical and preference information in this thesis. Technical information, firstly, is defined as highly technical, scientific, objective and data-driven information (Ainsworth, 1993; Broscheid & Coen, 2003; Chalmers, 2013), needed in order to understand the market (Bouwen 2002, 2004) and develop sound and effective political and legal initiatives (Gornitzka & Sverdrup, 2008). Preference information, secondly, is defined as information about public and private support as well as normative/value-laden claims (Chalmers, 2013; Bouwen, 2002, 2004), needed to identify the range of possible and acceptable political initiatives and solutions within the EU (Gornitzka & Sverdrup, 2008). Both types of information address the question whether a policy proposal works, i.e. if it will have a desirable outcome and if it will be acceptable to the actors involved in the political decision process (Broscheid & Coen, 2003). Based on the literature, both technical and preference information can be further categorized. This will be done below.

3.3.1 Technical information
Following Haverland & Liefferink (2012) and Chalmers (2013), technical information can be further divided in experiential/feasibility information; legal information; information that makes technical data understandable; information about the economic impact of policy; information about the social impact of policy; and information about the environmental impact of policy.3

First off all, there is the subcategory of experiential knowledge/feasibility information. In this category, two information types are combined: experiential knowledge on the one hand and feasibility information on the other. Haverland & Liefferink (2012) define experiential knowledge as ‘information about how policies actually work at the street level or company

---

3 It is important to note that there is, beyond the broad distinction between technical and preference information, thus far no exhaustive list of information types to be found in the existing literature. As Chalmers states, any attempt to create such a list of will be arbitrary to some extent, ‘simply because the information types available to interest groups are so broad and rich’ (Chalmers, 2013, p. 46). The categorization of technical information, is nearly completely based on the categorization of Chalmers (2013), since he actually is the only scholar who has in detail subcategorized and researched different types of technical information. In his 2013 study, he coupled insights from literature on informational lobbying and generated a list of six main information types: 5 types of technical information and 1 type of preference information. In this thesis there is a sixth type of technical information. Information on the environmental impact of policy, as described in this section, is originally not an information type of Chalmers. It was added to the ‘information types on the impacts of policy’, in line with Chalmers, given the fact that an informational lobbying strategy on air quality, i.e. environmental policy, is studied in this thesis.
level, and how implementation problems can be solved effectively’ (Haverland & Liefferink, 2012, p. 184). This kind of information is important because it adds to the compliance of (sub)national authorities and to implementation success, as the quote below shows.

‘The EU has an interest in the workability of policies as the implementation deficit has become a salient issue. Weak compliance undermines the legitimacy of the EU and may result in unequal competition as lax implementers have a competitive advantage. Crucially, the European Commission has to rely on the Member States [i.e. national and sub-national authorities] for the implementation of almost all EU policies. Experiential knowledge on the implementation of policies – on possible pitfalls and ways to avoid them – may thus turn into a powerful weapon in a Member State’s strategy in Brussels.’ (Haverland & Liefferink, 2012, p. 184)

Feasibility information is defined as information about the feasibility of implementing a policy proposal (Chalmers, 2013, p. 48-49). 4 Feasibility information is important for reasons similar to experiential information: a feasible policy likely increases the compliance of Member States, decreases implementation problems and generates output legitimacy (meaning that it shows the quality of the policy in terms of rationality and effectiveness, which legitimizes the actions of the European institutions) (Haverland & Liefferink, 2012). In general, feasibility information can help the European Commission to generate credibility.

Experiential knowledge and feasibility knowledge resemble each other and arguably go hand in hand. Feasibility information addresses the question if EU policy is feasible. Experiential information addresses implementation problems, explains how these implementation problems can be solved and in general explains positive and negative experiences from EU policy in practice – thus also addressing the question if EU policy is feasible. For this reason the two will not be regarded as different types of information, but will be combined in this thesis. Hence, experiential/feasibility information is all the information that describes how policies actually work at the street and/or company/government level, states implementation problems and how they can be solved effectively (Haverland & Liefferink, 2012), and in line with this, tells something about the feasibility of a policy proposal as a whole (Chalmers, 2013).

4 The term feasibility deserves clarification. The Oxford dictionary defines feasibility as the quality or fact of something being feasible. The term feasible is in turn defined as the capability of a design or project of being done, accomplished or carried out; the capability of a design or project being possible and/or practicable; or the capability of things being dealt with successfully in any way (www.oed.com).
Second of all, there is the subcategory of legal information (Chalmers, 2013), which defines as information that is needed in order to write the necessary rules and legislation of a policy proposal. Legal information often concerns information written in legal language, like draft proposals or other additions to existing regulation (Chalmers, 2013, pp. 46, 49). In this thesis, it is assumed that it can also point out errors in drafted law proposals, or explain how a new policy relates to existing laws in a Member State and consequently provide specific points of consideration. Legal information arguably is one of the most technical types of information, because of the necessary involvement of judicial experts in gathering and sending, as well as receiving and comprehending the information. Legal information should positively attribute to the coherence, quality and clarity of a policy-proposal and its accompanying law, resulting in more compliance, less implementation problems and general output legitimacy of the European Commission. Despite all this, legal information is mainly of importance to the Council of Ministers. It is after the European Commission stage that technical details become really salient (Chalmers, 2013, p. 49).

Third of all, there is the subcategory of technical data, and information that makes technical data understandable (Chalmers, 2013, pp. 46, ). This information type is of the utmost importance. As Haverland & Liefferink (2012, pp. 183-184) and Chalmers (2013, pp. 49, 51) state, modern lobbying has to be evidence-based, i.e. backed up with science, facts, figures and data. Science, facts, figures and data are of no use, however, if they are not understood by the European Commission, so information that makes them understandable is key. This type of information can thus translate technical details into something that the European Commission understands and relates to. Information that makes technical data understandable often goes hand in hand with other information types that involve technical data – for example information about the economic, social or environmental impacts of policy.

Fourth of all, there is the subcategory of information about the economic impact of policy (Chalmers, 2013, pp. 46-49). This type of information explains how a proposed policy will affect the (national, regional and/or local ) economies of Member States, i.e. how a proposed policy will affect the commerce, employment or incomes in a Member State (www.businessdictionary.com). Typically, this information is provided through scientific studies and research reports, in which the possible effects of a proposed policy are calculated.

Fifth of all, there is the subcategory of information about the social impact of policy (Chalmers, 2013, p. 49). This type of information states how policy will affect the social fabric
of the community and the well-begin of the individuals and families of a Member State’s society (Chalmers, 2013, pp. 46-49; www.businessdictionary.com). Typically, this information is provided along with or through scientific studies and research reports, in which the possible effects of a proposed policy are calculated (Chalmers, 2013, p. 49). Substantive, technical details are here combined with a specific public or social dimension (Chalmers, 2013, p 49).

Finally, the last subcategory of technical information is information about the environmental impact of policy. This information type is originally not an information type of Chalmers (see footnote three of this thesis on page 28). It was added to the ‘information types on the impacts of policy’, in line with Chalmers, given the fact that an informational lobbying strategy on air quality, i.e. environmental policy, is studied in this thesis. Information about the environmental impact of policy regards the consequences that the proposed policy would have on the environment, if the policy would become official legislation. In line with the information types on the economic and social impacts, information on the environmental impact is expected to be provided along with or through scientific studies and research reports, in which the possible effects of a proposed policy are calculated.

The need for information on the social, economic and environmental impacts of policy, and to a certain extent experiential/feasibility information, need to have a cause-effect logic to them. This cause-effect logic, i.e. the explaining of possible consequences of policy, is an absolutely necessary aspect of an informational lobbying message. In line with this, these kinds of information need to be evidence-based (Chalmers, 2013, p. 51). Finally, the last three types of technical information generate output legitimacy. When the European institutions take all the possible consequences of a policy into account, they show that their way of working is rational and effective.

<table>
<thead>
<tr>
<th>Technical information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Experiential/feasibility information</td>
</tr>
<tr>
<td>Legal information</td>
</tr>
<tr>
<td>Technical data and information that makes technical data understandable</td>
</tr>
<tr>
<td>Information about economic impact</td>
</tr>
<tr>
<td>Information about social impact</td>
</tr>
<tr>
<td>Information about environmental impact</td>
</tr>
</tbody>
</table>

Table 1. Technical information
3.3.2 Preference information

In preference information, one can distinguish information about the European Encompassing Interest and Information about the Domestic Encompassing Interest (Bouwen, 2002; 2004; 2009). On a metalevel, these information types express target group support (Haverland & Liefferink, 2012). Finally, there is information about the public opinion on new policy (Chalmers, 2013).

First of all, there is the subcategory of information about the European Encompassing Interest. This information type is defined as ‘the information required from the private sector on the European Encompassing Interest (EEI). (..) The EEI relates to the aggregated needs and interests of a sector in the EU internal market’ (Bouwen, 2004, p. 340). Information from the European Banking Federation is given as an example, as this is an organization that defends the aggregated needs and interests of approximately 32 banking associations, representing in total more than 4000 banks in Europe and more than two million employees (see http://www.ebf-fbe.eu/). Information from an organization like this is important for the European Commission, because it generates input and output legitimacy (it shows that the policy represents and is made taking in consideration the wants and needs of EU companies and that the policy is made in a rational and effective way), increases compliance (the individual banks will likely agree to execute the new policy, since they were involved making it), and decreases the chances of implementation problems (again because the implementing parties have been involved in the policy process).

It is important to point out that it is also possible for public entities to gather information on the European Encompassing Interests. Following Bouwen’s definition, the EEI in this thesis concerns the aggregated needs and interests of the private and/or public sector in the EU internal market. With ‘the public sector’, the government administrations and public administrators that have to carry out the European policy are meant, i.e. the provinces and regions of Europe, in this case.

Second of all, there is the subcategory of information on the domestic Encompassing Interest. It is defined as ‘the information required from the private sector on the Domestic Encompassing Interest (DEI)’ (Bouwen, 2004, p. 340). This information concerns ‘the aggregated needs and interests of a private sector in the domestic market’ (Bouwen, 2004, p. 340). Information from the Belgian Banking Federation is given as an example, as this is an association that defends the aggregated needs and interests of approximately 260 financial institutions in Belgium with
a combined total of more than 100,000 employees (https://www.febelfin.be). Like the information on the EEI, the information about the DEI also provides input and output legitimacy, compliance and a decrease of implementation problems. Again, also the Domestic Encompassing Interest can concern the public sector as well. With the public sector, the public administrations and public administrators that have to carry out the European policy are meant: the provinces and regions of the Netherlands, in this case.

Different from Bouwen (2002, 2004, 2009), Haverland & Liefferink (2012) do not state that there are specific preference information types. Instead, they argue that a lobbying message should enjoy target group support.

‘As a functional equivalent to full-fledged democratic control, the Commission seeks legitimacy for its policies with policy addressees and other actors directly involved in the policy. Moreover, (..), the implementation deficit is a salient issue in the EU. Lacking target group support is seen as an important reason for implementation failure. If a Member State [or in this case sub-national authority] can make it plausible that its ‘national position’ [or in this case sub-national position] is supported by a large share of the relevant private interests, this is likely to be helpful in Brussels. At the domestic level, this would require that the government, business, and societal organization at least broadly agree on the line to be followed in Brussels.’ (Haverland & Liefferink, 2012, p. 185)

Following the quote above, ‘policy addressees’ concern the private interests that are directly involved in the policy, but can concern other actors as well, as long as they are directly involved in the policy. These actors, in the case of the Dutch provinces, can at least include the public administrators that have to implement, enforce and monitor the policy. Other than that, Haverland & Liefferink’s notion of target group support complies with Bouwen’s preference information types, and information about the EEI and DEI can be regarded as a way in which this target group support is expressed. In that sense, the importance of the information on the Encompassing Interests is underlined by Haverland & Liefferink.

Before proceeding to the third and last type of preference information, it is important to note that the information about the Encompassing Interests do not necessarily have to be literally written down in a lobbying message. Target group support can also become clear from the co-signers of a lobbying message. Also, the formulation of the aggregated needs and interests of a private sector typically involves (inter)national associations, and ‘an interest is
more encompassing when more interested parties are involved in the formulation of the interest.’ (Bouwen, 2004, p. 340) The more encompassing an interest is, the more representative it is.

Finally, the third subcategory of preference information is information about the public opinion on policy (Chalmers, 2013, pp. 46, 48). It can be defined as the way the general public, i.e. the citizens of the EU, think about a policy proposal. It generates input legitimacy. The big difference between information about the public opinion on policy and information about the Encompassing Interests, is that information on public opinion concerns the ways the citizens of the EU look at a policy proposal, and that the DEI and EEI concern the needs and interests of companies and government administrations regarding a policy proposal. The public opinion regards citizens of the EU, whilst the information about the Encompassing Interests regards the actual stakeholders of EU policy, i.e. the parties that will have to implement the new EU rules.

Since public administrations are believed to act on behalf of the public, it is possible that the public opinion is taken into account in their formulation of their needs and interests. However, what is the stance of the public on a certain policy, and what the needs and interests of companies and public administrations are on a certain policy, are two different things. In sum, although information about the Encompassing Interests and information about the public opinion are much connected, they do not exactly comply with each other, as the analysis in this thesis will make clear.

<table>
<thead>
<tr>
<th>Preference information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information about the European Encompassing Interest</td>
</tr>
<tr>
<td>Information about the Domestic Encompassing Interest</td>
</tr>
<tr>
<td>Information about the public opinion on policy</td>
</tr>
</tbody>
</table>

Table 2. Preference information

3.3.3 The ranking of dependencies
Next to the different types of information that interest groups need to provide, some scholars have also studied the degree to which a certain information type leads to access and, in turn, influence in the European policy process. Bouwen (2004, p. 345) speaks of the ‘ranking of dependencies’: the degree to which an information type is important for the European institutions, in this case the European Commission, in order to continue its work. In
continuation with this, Bouwen states that within his categorization of information types, the most important type of information for the European Commission is expert information, i.e. technical information, followed by information on the European Encompassing Interest. Information on the Domestic Encompassing Interest, on the other hand, is not important at all to the European Commission in the agenda-setting and policy-formulation stage of the EU policy process (Bouwen, 2004, pp. 345 – 347). It is argued that in this early stage of the policy process, information about the Domestic Encompassing Interest cannot yet be defined (Bouwen, 2002, p. 379; 2004, pp. 345, 346). Moreover, it is argued that the European Commission is simply not interested in information on the Domestic Encompassing Interest, as it is not their task to address the domestic interests. The task of the European Commission is to promote the common European interests (Bouwen, 2002, p. 379; 2004, pp. 345, 346).

In line with Bouwen, Chalmers (2013) agrees on the importance of technical information. Moreover, he states that within technological information, compared to the other types of technical information, only the subcategory of experiential/feasibility information significantly improves access and ultimately influence in the European Commission (Chalmers, 2013, p. 48).

Haverland & Liefferink (2012) state that the European Commission is mainly interested in experiential/feasibility information and legitimacy in the form of (information on) target group support. Note that Haverland & Liefferink (2012) do not state that information about the Domestic Encompassing Interest is irrelevant, like Bouwen does Furthermore, Haverland & Liefferink emphasize the importance of scientific, evidence-based information. This is a character trait that applies to all types of technical information. Finally, power in the form of economic strength and size are less important than they are in the later stages of the European policy process (Haverland & Liefferink, 2012, p. 182)

A counterargument to all this is provided by Klüver who argues that all types of information are important for the European Commission to receive, and all kinds of information in turn are important for interest groups to provide (Klüver, 2013, p. 205). Given the fact that the European Commission wants a policy proposal to get accepted by the Parliament and the Council of Ministers after its formulation and publication, the types of information that are important for the Council of Ministers and Parliament are also important for the European Commission – both preference and technological information (Klüver, 2013, p. 205). Following this line of thought, all types of technical and preference information that become relevant at a certain point in the European policy process, improve the chances of acceptance
of a policy proposal in the later stages of the European policy process, and are thus useful (Klüver, 2013).

In this thesis, Klüver’s view on the importance of information types is followed. This means that it is assumed that both technical and preference information are important in order to influence the European policy process, and that both of them are important in order to influence the European Commission. Henceforth, the presence of both types of information will be assessed. Nonetheless, a slight nuance can be made. Based on Bouwen (2002, 2004) and Chalmers (2013), it can be said that for the European Commission technical information is more important than preference information. Within the category of technical information, the most important one is experiential/feasibility information. Also, in preference information, the information about the Domestic Encompassing Interest is less important than information about the European Encompassing Interest (Bouwen, 2002, 2004; Chalmers, 2013). Based on Haverland & Liefferink (2012), however, there is no reason to disregard the information about the DEI in its entirety.

In sum, the previously discussed views on critical information types lead to the following theoretical preconditions, i.e. the following evaluative framework, of an effective informational lobbying strategy.

**Precondition 1.** To be effective in informational lobbying, interest groups must communicate technical information to the European Commission

**Precondition 1.1** To be effective in informational lobbying, interest groups must communicate experiential/feasibility information to the European Commission

**Precondition 1.2** To be effective in informational lobbying, interest groups must communicate legal information to the European Commission

**Precondition 1.3** To be effective in informational lobbying, interest groups must communicate technical data and information that makes technical data understandable to the European Commission

**Precondition 1.4** To be effective in informational lobbying, interest groups must communicate information about the economic impact of a policy to the European Commission

**Precondition 1.5** To be effective in informational lobbying, interest groups must communicate information about the social impact of a policy to the European Commission
Precondition 1.6 To be effective in informational lobbying, interest groups must communicate information about the environmental impact of a policy to the European Commission

Precondition 2. To be effective in informational lobbying, interest groups must communicate Preference information to the European Commission.

Precondition 2.1 To be effective in informational lobbying, interest groups must communicate information about the European Encompassing Interest to the European Commission.

Precondition 2.2 To be effective in informational lobbying, interest groups must communicate information about the Domestic Encompassing Interest to the European Commission.

Precondition 2.3 To be effective in informational lobbying, interest groups must communicate information on the public opinion to the European Commission.

3.4 Communication strategies
In the former, the different types of information that interest groups need to provide to the European Commission in order to gain influence have been explained. The logical follow-up question is: in what ways can these types of information be successfully communicated to the European Commission? In this paragraph, the different general strategies that can be used in order to get the different types of information across are described, along with specific tactics that give form to the strategies in practice.

3.4.1 Insider and outsider strategies in general
In the lobbying literature, scholars talk about lobbying strategies, tactics, and techniques of exercising influence (Schlozman & Tierney, 1983, as cited in Opfer, 2001, p. 141). All of these terms are used to describe ways to communicate information to the European institutions, and hereby exercise influence. Schlozman & Tierney (1986, as cited in Opfer, 2001, p. 141) make a difference between access-requiring tactics and non-access requiring tactics. Later authors have adopted this categorization under a different name: insider and outsider strategies. This categorization is now the most used one in lobbying literature (see Broscheid & Coen, 2003; Chalmers, 2013; Dür & Mateo, 2010; Eising, 2007; Kollman, 1998). Binderkrantz and Beyers still distinguish between respectively direct and indirect strategies (Binderkrantz, 2005) and access and voice strategies (Beyers, 2004), but these strategies comply with insider and outsider strategies. Below, insider/access strategies as well as outsider/voice strategies will be explained.
and combined, for the purpose of this research. Ultimately, like the majority of the authors (Broscheid & Coen, 2003; Chalmers, 2013; Dür & Mateo, 2010; Eising, 2007; Kollman, 1998), I will use and make a distinction between insider and outsider strategies.

**Insider strategies**
The first category of communication strategies are insider strategies. Insider strategies are strategies in which policy makers are contacted directly. Insider strategies are used by lobbying parties that have the access to get directly in touch with the policy makers ‘on the inside’, for example in committees, working groups or at conferences (Binderkrantz, 2005, p. 694; Eising, 2007, p. 339; Broscheid & Coen, 2003, p. 168; Beyers, 2004; Chalmers, 2013).

According to Beyers, access strategies are defined as strategies that take place in a closed setting, and revolve around ‘the exchange of policy-relevant information with public officials through formal or informal networks’ (Beyers, 2004, p. 213). They generally concern the venues where political bargaining takes place: for example the advisory bodies, technical committees and agencies active within the European Commission (Beyers, 2004, p. 213). Access strategies communicate information directly from interest associations to policy-makers. Access strategies, finally, are particularly suited for the communication of technical information: ‘it is in closed settings such as expert committees or advisory bodies that technical policy information is scrutinized in detail’ (Beyers, 2004, p. 213).

In sum, insider strategies are strategies in which policy makers are contacted directly, through formal or informal networks, by using access to these policy makers (Boscheid & Coen, 2003; Beyers, 2004; Binderkrantz, 2005). For the sake of this thesis, I argue that insider strategies do not necessarily have to take place in committees, advisory groups or the likes. Sending a direct e-mail or making a phone call is seen as an insider strategy as well (Chalmers, 2013). Finally, insider strategies are particularly suited for the communication of technical information (Beyers, 2004, p. 213).

**Outsider strategies**
As opposed to insider strategies, outsider strategies are strategies used by outsiders, i.e. lobbying parties that do not have the access to get in touch with the policy makers directly, and henceforth need other ways to get their attention. As a result of the lack of direct contact,
outsider strategies focus on the use of media, launching public campaigns and arranging public events (Chalmers, 2013, p. 43).

Beyers’ equivalent of outsider strategies, i.e. voice strategies, refer to strategies that take place in the public sphere. Voice strategies can be used to communicate technical information, but this is not generally done in practice, because ‘information tends to enter the public sphere somewhat haphazardly and in an incongruent fashion.’ (Beyers, 2004, p. 214) This is undesirable when communicating technical information. Voice strategies are, as a consequence, mostly used to communicate values and opinions (Beyers, 2004).

Within voice strategies, Beyers makes a difference between information politics and protest politics. Information politics defines as ‘the public presentation of information at strategic decision points - for instance, Greenpeace holding a press conference while the European Parliament debates the issue of genetically modified organisms’ (Beyers, 2004, p. 214). For the purpose of this thesis, information politics is defined slightly different, namely as the public presentation of information, with the purpose of signaling information to key policy-makers, without direct contact with them. Protest politics are defined as events that are explicitly staged and meant to attract attention and expand conflict regarding a policy issue (Beyers, 2004, p. 214). ‘Protest politics not only informs public officials about potential support or opposition; it is meant to leave an impression on them.’ (Beyers, 2004, p. 215)

In sum, outsider strategies are in this thesis defined as strategies used by ‘outsiders’, i.e. lobbying parties that do not have the access to get in touch with the policy makers directly, and henceforth need other ways to get their attention. Outsider strategies can be further categorized in information politics and protest politics, following Beyers (2004, p. 214). Both of these subcategorizations, as defined in the previous section, will be used in this thesis. Information politics is here defined as the public presentation of information, with the purpose of signaling information to key policy-makers, without direct contact with them. Protest politics is defined as events that are explicitly staged and meant to attract attention and expand conflict regarding a policy issue (Beyers, 2004, p. 214). The subcategory of protest politics is of special importance, as literature prescribes that this category of communication strategies needs to be carefully considered and is not without danger. This will be elaborated upon after I explain the specific, practical insider and outsider strategies in the next section.
3.4.2 Insider and outsider strategies in practice
In the previous part, the theoretical distinction between insider and outsider strategies has been explained. In this section, the specific insider and outsider strategies are described, on a practical level. Schlozman & Tierney (1983, as cited in Opfer, 2001, p. 141) have listed 23 specific strategies of exercising influence. Regarding strategies requiring access, i.e. insider strategies, the following strategies are mentioned: testifying at hearings, contacting officials directly, engaging in informal contact, shaping implementation of policies, planning legislative strategies with officials, drafting legislation, drafting regulations, rules, and so forth, serving on commissions, doing favors for officials, influencing appointments, shaping the agenda. Regarding strategies that do not require access, i.e. outsider strategies, the following strategies are mentioned: presenting research results, sending letters to members, entering into coalitions, talking with the media, inspiring letter writing, mounting grassroots lobbying, members contact officials, filing suit, publicizing voting records, running advertisements, engaging in protests, showing the effects of a bill (Schlozman & Tierney, 1983, as cited in Opfer, 2001, p. 141).

Concerning his access strategies, Beyers states that an interest group can contact (members of) the European Commission, the European Parliament, the European Council, the Economic and Social Committee and the Committee of Regions (2004, p. 223). In this research, only the members of the European Commission are assumed to be relevant, since all the other parties get involved after the official publication of a policy proposal. Beyers does not state specific access strategies that can be used to in order to communicate information to the members of the institutions.

Concerning information politics and protest politics, he does. Specific tactics of information politics are: organizing a press conference, disseminating views by publishing folders and brochures, participating in debates in the press, and involving well-known personalities in public campaigning. Specific tactics of protest politics are: organizing manifestations/demonstrations, staging a street action, organizing a petition, and engaging in disruptive activities (Beyers, 2004, p. 226).

Binderkrantz (2005) lists the following insider strategies: contacting the relevant minister, contacting a national public servant, to actively use public committees, to respond to requests for comments (Binderkrantz, 2005, p. 696). The outsider tactics are: to contact reporters, to write letters to the editor and columns, to issue press releases and hold press conferences, to publicize analyses and research reports, to arrange public meetings and
conferences, to organize letter-writing campaigns, to arrange strikes/civil disobedience/direct action/public demonstrations and to conduct petitions (Binderkrantz, 2005, p. 696).

Chalmers (2013), who categorizes insider and outsider strategies, lists the following specific tactics. Insider tactics: face-to-face conversations, open consultation, writing a letter, writing an e-mail, making a phone call. Regarding outsider tactics: Organizing a media campaign and organizing a public event (Chalmers, 2013, p. 48).


<table>
<thead>
<tr>
<th>Insider and outsider strategies in the European Commission phase</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Insider strategies</strong></td>
</tr>
<tr>
<td>Write position papers:</td>
</tr>
<tr>
<td>a) in reaction to a green paper</td>
</tr>
<tr>
<td>b) in reaction to a white paper</td>
</tr>
<tr>
<td>Take part in internet consultations</td>
</tr>
<tr>
<td>Take part in impact assessments</td>
</tr>
<tr>
<td>Respond to requests or comments in other ways</td>
</tr>
<tr>
<td>Attend meetings</td>
</tr>
<tr>
<td>Take part in expert groups</td>
</tr>
<tr>
<td>Make phone calls</td>
</tr>
<tr>
<td>a) to members of the EC</td>
</tr>
<tr>
<td>b) to members of expert groups</td>
</tr>
<tr>
<td>Write letters</td>
</tr>
<tr>
<td>a) to members of the EC</td>
</tr>
<tr>
<td>b) to members of expert groups</td>
</tr>
<tr>
<td>Send e-mails</td>
</tr>
<tr>
<td>a) to members of the EC</td>
</tr>
<tr>
<td>b) to members of expert groups</td>
</tr>
<tr>
<td>Face-to-face communication</td>
</tr>
<tr>
<td>a) with members of the EC</td>
</tr>
<tr>
<td>b) with members of expert groups</td>
</tr>
</tbody>
</table>

Table 3. Ways of communication

In the table 3, all the different strategies are combined and put into one format, following the leading categorization of insider and outsider strategies – the last one having the additional subcategories of information politics and protest politics. As a tool of evaluation, this list will be used to check the lobbying activities of the Dutch provinces and their coalition partners.
Please note that this list is not exhaustive; there might be other ways of communication that could be added. Nonetheless, this list serves well as a helpful tool in evaluating the informational lobbying strategy of the Dutch provinces.

3.4.3 The degree of effectiveness
How important are the different communication strategies in order to reach and influence the European Commission? According to Beyers (2004), it is better to use insider strategies if one wants to build a network with European Commission. Also: outsider strategies are costly.

According to Eising, insider strategies are ‘highly effective means of communicating policy information to the bureaucratic staff when policy proposals are being drafted’, i.e. in the European Commission phase (Eising, 2007, p. 355). The impact of outsider strategies varies. They can have effect when European institutions are under public scrutiny, but they also undermine the chances to successfully use the more effective insider strategies, because outsider strategies tend to reduce the access to bureaucratic staff (Eising, 2007, p 355).

Binderkrantz (2005) nuances Eising and Beyers, by stating that both insider and outsider strategies can be used in order to influence the European Commission. Chalmers (2013) concurs with this statement – he even states that outside strategies can serve as a tool to increase the salience of lobbying efforts (Chalmers, 2013). Moreover, he states that ‘the medium is more important than the message’ (Chalmers, 2013, p. 41). Information types are important, in other words, but the ways to communicate these information types are arguably even more important. Consequently, it is best to use a large array of strategies and to communicate the same message in as much different ways as possible, when one wants to influence the European Commission. Finally, face-to-face conversations, open consultations, strategies that are a part of media campaigns and public events are significantly more successful in gaining influence than other tactics (Chalmers, 2013, p. 48).

Apart from the previous, there is one rule to keep in mind: be careful with using protest politics. Of all the different communication tactics, protest politics can be dangerous. They can ruin the relationship with members of the European Commission, and thus have a negative effect on the inside access of interest groups, and in turn greatly affect the range of insider tactics that an interest group can choose from in order to in exert influence in the future (Beyers, 2004). This is an important notion to keep in mind, since all mentioned scholars concur that, although insider and outsider strategies can be combined, insider strategies are more effective when wanting to exert influence.
In sum, the previously discussed views on ways of communication lead to the following theoretical preconditions, i.e. the following evaluative framework, of an effective informational lobbying strategy.

**Precondition 3.** To be effective in informational lobbying, interest groups must use all possible insider strategies as a means to communicate information to the European Commission.

**Precondition 4.** To be effective in informational lobbying, interest groups must use all information politics as a means to communicate information to the European Commission.

**Precondition 5.** To be effective in informational lobbying, interest groups must not use protest politics as a means to communicate information to the European Commission.

### 3.5 Conceptual model

![Figure 2. Conceptual model (1/2)](image)

Figure 2 and figure 3 display the conceptual model of this chapter: an informational lobbying strategy consists of communicated information types, in combination with communication strategies. An effective informational lobbying strategy should contain certain types of technical and preference information, and certain insider and outsider strategies to
communicate this information. Ideally, an effective informational lobbying strategy leads to influence on policy.

The word ‘ideally’ gives away that the relation between informational strategy is not entirely causal. As will be explained in detail in the next chapter, interest groups can never be sure that a policy outcome can be ascribed to their lobbying efforts, because there are so many other actors that lobby simultaneously – sometimes even for the same policy outcomes.

Besides the hundreds of other actors lobbying the European Commission, there are several other intermediary factors that affect the degree to which an informational strategy will lead to influence. For example, the influence of an informational lobby is also related to the organizational characteristics of the interest group and its opponents, like the degree of decentralization and the available financial resources; the strength of the interest groups’ networks and the degree to which the information that interest groups provide is at that moment critical for the European Commission in order to formulate a policy proposal.

Nonetheless, what can be said is the following: according to literature, certain information types and certain ways to communicate these information types, are necessary for exerting influence on the European Commission of the European Union, in European Commission phase of the EU policy cycle.

Figure 3. Conceptual model (2/2)
3.6 Summary
This theoretical framework started with defining what informational lobbying is, namely lobbying through the provision and distribution of informational content (Lohmann, 1995) and/or specialist information (Austen-Smith, 1993) by interest groups to decision-makers (Broscheid & Coen, 2003), without any contingent punishments or rewards (Gullberg, 2013), in order to influence policy formulation and decision-making in the European policy process of the European Union (Zibold, 2013; Gullberg, 2013). Secondly, the logic of informational lobbying was explained: because the European institutions do not have enough time and personnel to gather all information necessary for policy making, interest groups can influence the European Commission through the provision of information. Thirdly, it was established that an informational lobbying strategy consists of communicated information and used ways of communication. The information can be divided in technical and preference information, and these two in turn consists of several subcategories. Ways of communication are insider and outsider strategies. Outsider strategies can be further divided in information politics and protest politics. According to literature, all types of technical and preference information should be communicated, and except for protest politics, all ways of communication should be used, if an interest group wants to lobby effectively. An overview of all this can be seen in the conceptual model.
Chapter 4.

Methodological framework

In this chapter the methodology of this thesis is explained: the research design and the accompanying underlying choices are discussed. First of all, the evaluative nature of this research is explained. Second of all, the qualitative nature of this research is explained. Third of all, the reasons for conducting a singular case study instead of a multiple case study are discussed. Fourth of all, the two methodological tools of this research, qualitative content analysis and semi-structured interviews, are elaborated upon. Fifth of all, used analysing techniques are discussed. Finally, an operationalization of the research design is formulated.

4.1 Evaluative research

In this thesis, evaluative research was conducted. Evaluative research is defined as research that ‘systematically examines people, programs, organizations, and/or policies to assess their quality, merit, and effectiveness’ (Saldana, 2011, p. 17; see also Bryman, 2012, p. 57; Van Thiel, 2014, p. 8; Verschuren & Doorewaard, 2007, p. 81). Furthermore, ‘evaluation research is generally a contracted enterprise, and the best studies involve the immediate stakeholders as part of the evaluation process from the beginning, soliciting from them their perceptions of the program, and how the evaluation will ultimately help them redesign current and future endeavors’ (Saldana, 2011, p.17)

In line with Saldana’s definition, this research systematically examined a specific program or policy, e.g. the informational lobbying strategy of the Dutch provinces, and its quality is assessed. It evaluated if the informational lobbying strategy of the Dutch provinces met all the theoretical criteria of a successful informational lobbying strategy, concerning information types and ways of communication.

If one had to put a label on this evaluative research, it would be a process evaluation, as opposed to a plan or product evaluation (Verschuren & Doorewaard, 2007). The process of informational lobbying, and its effectiveness in the particular case of the Dutch provinces regarding Air Quality, was assessed. The emphasis was on the conducted lobbying efforts and if these lobbying efforts are seen as effective; not necessarily on the actual outcome of the
informational lobbying efforts of the Dutch provinces, which would be a product evaluation. The emphasis was neither on the feasibility of the informational lobbying strategy of the Dutch provinces, which would be a plan evaluation (Verschuren & Doorewaard, 2007).

Finally, this evaluation was done ex-post, meaning that the evaluation was done after the studied informational lobbying strategy was implemented. According to Van Thiel, ex-post evaluations could be used to ‘support the decisions to continue on the policy course set out, or to make certain adaptations on the way, or even to terminate a policy measure.’ (Van Thiel, 2014, p. 9) This was exactly the intention of this research.

4.2 Qualitative research
In the field of public administration, there are three types of research a researcher can conduct: qualitative, quantitative, and mixed methods research. As stated by Babbie, the distinction between qualitative and quantitative research is essentially a distinction between numerical and non-numerical data (Babbie, 2004, p. 26)

Qualitative research can be defined as ‘the collection and interpretation of qualitative data on a certain social phenomenon or social process, in the particular context in which it occurs’. (Summer, in: Jupp, 2006, pp. 248 – 249). The qualitative data can be explained as lingual and non-numerical material, it has to be collected through interviews, document analysis and/or observations (Bleijenbergh, 2013, p. 10; Saldana, 2011, p.3, Van Thiel, 2014), and in general it cannot be used in statistical calculations, but must be analysed by other methods like coding or interpretation (Van Thiel, 2014). Qualitative research enables the researcher to learn about a certain social phenomenon or process, from the perspective of the studied respondents, in order to describe, and if possible explain the social phenomenon or process (Boeije, 2005, p. 27).

Quantitative research, on the other hand, involves the collection of quantitative data, in numerical form, on a social phenomenon or social process, for quantitative analysis (Garwood, in: Jupp, 2006, p. 250; Golafshani, 2003; Bryman, 2012, p. 159; Bleijenbergh, 2013; Van Thiel, 2014) The numerical data may consist of durations, scores, counts of incidents, ratings, and/or scales. ‘The defining factor is that numbers result from the research process - whether the initial data produced numerical values or whether non-numerical values were subsequently converted into numbers as part of the analysis process’ (Garwood, in: Jupp, 2006, p. 250). Mixed methods
research combines qualitative and quantitative research. Both numerical and non-numerical data are processed (Yang & Miller, 2008; Van Thiel, 2014).

In this thesis, qualitative research was conducted. As a result of the topic of research (the informational lobbying strategy of the Dutch provinces; the communicated information and the used ways of communication) the focus was on lingual, non-numerical data. The communicated information was reconstructed through document analysis, and the used ways of communication were mainly reconstructed through interviews. Besides this, attention was also given to the reasons why the Dutch provinces made their specific lobbying efforts and which efforts they found effective. Since such an in-depth view of the informational lobby of the Dutch provinces could not be acquired through just numerical data and quantifications, the use of qualitative research was appropriate.

There were multiple advantages to qualitative content analysis as a research method. First of all, it was very efficient and cost-effective: a researcher could assess the data at a time convenient for him, it was possible to acquire a relatively big amount of data in a short amount of time, and the researcher only had to assess the data after collecting it (Creswell, 2014; Babbie, 2004, p. 323) Transcribing the data, for example, as one has to do when conducting interviews, was not necessary (Van Thiel, 2014, p. 102) Finally, acquiring an in-depth view of the research topic enabled the researcher to approach theory inductively, next to the ‘normal’ deductive way of using theory. This inductive aspect of qualitative research was a big advantage.

4.3 Singular case study
In this research a case study was conducted, consisting of qualitative content analysis and interviews. Case studies can be defined as ‘a way of research in which the researcher tries to obtain an in-depth and integral insight in one or several, by time and space limited objects or processes’ (Verschuren & Doorewaard, 2007, p. 183; see also Babbie, 2004, p. 293). Examples of these objects and processes are companies; municipalities or ministries; the coming of age of a certain law; or the process of deciding the new location of waste disposal (Verschuren & Doorewaard, 2007, p. 184). Another definition of case study research is provided by Creswell. He defines case study research as ‘studies in which the researcher explores a single entity or phenemon (the case), bounded by the time and activity (a programme, event, process, institution, or social group) and collects detailed information by using a variety of data-
collecting procedures during a sustained period of time’ (Creswell, 2014, p. 14; see also Flyvbjerg, 2006, 219).

Case study research was done in this thesis, as it was needed to gain in-depth integral insights into the informational lobby of the Dutch provinces in this research in order to answer the main research question. The studied research object in casu was limited in time and space, given the focus on the activities of the provinces in the European Commission phase between 2011 and 2014. Following Creswell’s definition of case study research, a single entity or phenomenon (the informational lobby of the Dutch provinces) was studied, bounded by time and activity (the assessed informational lobby took place in the European Commission phase between 2011 and 2014) and detailed information was collected using a variety of data-collecting procedures (interviews and document analysis, as will be explained further on). For a large part, this research consists of a document analysis that is based on documents gathered through archival research.

There are two kinds of case studies: the singular case study, in which only one case is assessed in an in-depth way, and the multiple case study, in which two or more cases are assessed and compared. Here a singular thesis was conducted, because of reasons of time, practicability and feasibility. Furthermore, the choice for a singular case study was made after consultation with the Dutch provinces. Employees from IPO and HNP stated that the case of air quality was relatively recent, well-documented and the people involved were accessible and willing to cooperate, making this research feasible to conduct in the available time. Also, air quality is a typical provincial dossier, which makes it appropriate to research (personal communication, lobbyist A; lobbyist B). In decentralized policy fields like environmental policy and nature legislation the influence of EU rules is substantial, and the provinces have increasingly become enforcers of EU law, especially in the case of regional environmental policy (Mastenbroek et al., 2013).

4.4 Methods of data collection and analysis

In order to evaluate if the informational lobbying strategy of the Dutch provinces has met all the given preconditions on information types and ways of communication in the case of air quality, a complete-as-possible view of the communicated information and the used ways to communicate this information was acquired and analysed. This was done through qualitative content analysis and the conducting of semi-structured interviews.
4.4.1 Qualitative content analysis

The bulk of this research was done in the form of a qualitative content analysis, or document analysis, for reasons of cost-effectiveness, and the method being relatively unobtrusive (non-interfering with the existing research situation) (Babbie, 2004, p. 323-324; Van Thiel, 2014, p. 102; see also Creswell, 2014). Qualitative content analysis is defined by Hsieh & Shannon as ‘a research method for the subjective interpretation of the content of text data through the systematic classification process of coding and identifying themes or patterns’ (Hsieh & Shannon, 2005, p. 1278; see also Boeije, 2010, p. 95). Similar to this definition, Elo & Kyngäs define content analysis as ‘a systematic and objective means of describing and quantifying phenomena’ (Elo & Kyngäs, 2007, p. 109; see also Van Thiel, 2014, p. 143) Concerning the actual qualitative content, Babbie speaks of ‘recorded human communications’ (Babbie, 2004, p. 314) and Cole refers to ‘written, verbally, or visually communication messages’ (Cole, 1988, as cited in Elo & Kyngäs, 2007, p. 107). Examples of qualitative content are policy memoranda, legal documents and annual reports, but also e-mails, brochures, websites, social media and audiovisual material (Creswell, 2014, Van Thiel, 2014; Bleijenbergh, 2013).

In order to evaluate the informational lobbying strategy of the Dutch provinces, all available documents communicated by the Dutch provinces and their coalition partners needed to be collected and assessed - position papers, e-mails, website content, press releases and more – so there was no need to draw a sample.

The rules on how to conduct a qualitative content analysis are not set in stone. What is essential, though, is to classify the collected data into much smaller content categories (Elo & Kyngäs, 2007, p. 108; Babbie, 2004, p.375; see also Weber, 1990), or, in other words, to assign codes to the collected data. Furthermore, in order to make the assigning of codes easier, it is possible to formulate indicators that belong to a certain code. Indicators can be seen as even smaller categories according to which data can be classified. In section 4.7 of this chapter, this thesis’ system of codes and indicators is presented.

When conducting a qualitative content analysis, a researcher can choose between deductive and inductive content analysis. A deductive content analysis is used when ‘the structure of analysis is operationalized on the basis of previous knowledge and the purpose of the study is theory testing’ (Kyngäs & Vanhanen, 1999, as cited in Elo & Kyngäs, 2007, p. 110; see also Boeije, 2010, pp. 101-102). Inductive content analysis works the other way around, i.e. from data to theory (Elo & Kyngäs, 2007, p. 110). In this thesis, a deductive qualitative content
analysis was done, since the necessary preconditions that were checked to be present in the informational lobby of the provinces were derived from theory. Consequently, the operationalized system of codes and indicators was also derived from theory.

4.4.2 Semi-structured interviews

An interview can be defined as ‘a data-collection encounter in which one person (an interviewer) asks questions of another (a respondent)’ (Babbie, 2004, p. 263; see also Van Thiel, 2014, p. 93). In this thesis, interviews were firstly conducted to find out in detail in how the provinces and their coalition partners communicated information to the European Commission (see also Tansey, 2007, p. 765). Secondly, interviews were conducted in order to gain extra information about the communicated information types. The interviews were in this case used to crosscheck the view of communicated information types that resulted from the qualitative content analysis. If possible, extra findings were added, by for example asking questions about which information types or which ways of communication were seen as useful or important by lobbyists and Commissioners. The conducted interviews were afterwards transcribed and added to the data of the qualitative content analysis.

There are three types of interviews: the open or unstructured interview, in which the only fixed item in the conversation is the initial question with which the researcher opens; the structured interview, which is in effect an oral versions of the questionnaire; and the semi-structured interview, which is a mixture of structured and open interviews (Van Thiel, 2014).

In this thesis, semi-structured interviews were done. Unstructured interviews were not deemed appropriate; the aim of interviewing was to render very specific information on informational lobbying, and freely conducting interviews without any prepared questions would pose a great risk of not acquiring the information needed. It would have been possible to conduct fully structured interviews, but this was not chosen to do, as they would also have decreased the chance of acquiring useful or interesting information by chance. Semi-structured interviews provided the assurance of acquiring the absolutely necessary information, without denying the possibility of other, unrelated but possibly useful, information.

In other words, semi-structured interviews provided a flexible way of collecting data. During the interviews, the researcher could ask supplementary questions about a certain topic in order to gain a better and fuller understanding of an answer was given earlier in the conversation. Henceforth, the researcher could for example look for more background
information, or ask for added explanations (Van Thiel, 2014, p. 93; Babbie, 2004, p. 300-301; see also Boeije, 2005; Creswell, 2014). Other advantages of the semi-structured interviews were that they offered a way to gather information in a situation where it was not possible to observe participants directly, and that the interviewees could provide historical information (Creswell, 2014). These two advantages were particularly relevant to this thesis, as the case studied already took place in the past.

The interviews were conducted face-to-face, enabling the researcher to derive information from body language, on top of the spoken information (Babbie, 2004, p. 264). As a result of geographical distance, interviews were also conducted by phone - three times to be exact. In these instances, the interviews by phone were more practical and time efficient than face-to-face interviews (Harvey, 2011, p. 435).

Interview respondents were ‘purposefully sampled’ in this thesis. Instead of randomly choosing people to interview, the respondents were chosen based on their involvement and understanding of the informational lobbying strategy of the Dutch provinces and their coalitions partners, and on their general knowledge and understanding of the European policy process in the case of air quality (Seidman, 1998; Tansey, 2007, p. 770). Also, the respondents were chosen in a way that they, combined, covered as much relevant actors in the informational lobby of the Dutch provinces as possible and thus offered a wide variation of interviewed people (Seidman, 1998, p. 45). For a list of respondents, see appendix I.

It was decided that 12 interviews sufficed for this study, based on the ‘criterion of saturation’. As Seidman reports (1998, p. 48), there is a point in a study where a researcher starts to hear the same information again, and he is not learning anything new (Seidman, 1998, p. 48). This point was reached after 12 interviews.

4.5 Operationalization
In order to assess and evaluate the informational lobbying strategy of the Dutch provinces in the case of air quality, this thesis’ conceptual framework (see chapter 3, section 3.5) was operationalized. As a result of the deductive nature of this research, the used codes corresponded with the different theoretical information types and ways of communication. To the codes, as much indicators as possible were assigned, derived from their definitions. Below, all the codes, along with their theoretical definitions and related indicators, are described.
1A. **Experiential/feasibility information**: all the information that describes how policies actually work at the street and/or company level, states how implementation problems can be solved effectively, and in line with this tells something about the feasibility of a policy proposal as a whole (Chalmers, 2013; Haverland & Liefferink, 2012).

Indicators: information on (reasons for) practical implementation problems; solutions for practical implementation problems; information on (reasons for) compliance problems; solutions for compliance problems; information that points out how EU policy is ineffective; information posing possible ways to make EU policy more effective information on the ways how regions carry out EU policy; information on the best practices of regions in carrying out EU policy.

1B. **Legal information**: information that is needed in order to write the necessary rules and legislation of a policy proposal (Chalmers, 2013).

Indicators: legal language; draft proposals or other written regulation, pre-written legal articles; suggestions on how the European Commission could alter existing policy and in turn improve it; information on how EU policy complies or does not comply with existing domestic/EU/international regulation.

1C. **Technical data and information that makes technical data understandable**: very technical information like scientific findings, research analyses, figures and numerical data, and information that makes this information understandable and interpretable for the European Commission (Chalmers, 2013).

Indicators: technical data; numerical data; measurements of air quality; information explaining the findings of scientific reports, or references to scientific reports; information explaining the findings of published research analyses, or references to published research analyses; graphs; tables.
1D. Information about the economic impact of proposed policy: information that states how a proposed policy will affect the (national, regional and/or local) economies of Member States, i.e. how a proposed policy will affect the commerce, employment or incomes in a Member State (Chalmers, 2013).

Indicators: calculated information about the effects of the proposed EU policy on regional and/or local commerce, in case of implementation of the policy; calculated information about the effects of the proposed EU policy on regional and/or local employment, in case of implementation of the policy; calculated information about the effects of the proposed EU policy on regional and/or local incomes, in case of implementation of the policy; calculated facts and (non-) numerical data about the economy, should the proposed EU policy become official legislation; predictions on the effects of proposed EU policy.

1E. Information about the social impact of proposed policy: information about the social impact of policy, i.e. information that states how policy will affect the social fabric of the community and the well-being of the individuals and families of a Member State’s society (Chalmers, 2013; www.businessdictionary.com).

Indicators: calculated information about the effects of proposed EU policy on the social fabric of local/urban/regional communities in Europe, in case of implementation of the policy; information about the effects of proposed EU policy on families living in municipalities, cities and regions, in case of implementation of the policy; information about the effects of EU policy on individuals in the society of European municipalities, cities and regions, in case of implementation of the policy; calculated facts and (non-) numerical data, should the proposed EU policy become official legislation; predictions on the effects of proposed EU policy.

1F. Information about the environmental impact of proposed policy: information that regards the consequences that the proposed policy would have on the environment, if the policy would become official legislation (Chalmers, 2013).

Indicators: calculated information about the effects on the environment, in case of implementation of the policy; calculated facts and (non-)numerical data about the environment,
should the proposed EU policy become official legislation; predictions on the effect of proposed EU policy.

2A. Information about the European Encompassing Interest: the information required from the private and public sector on the European Encompassing Interest (EEI), regarding the aggregated needs and interests of a sector in the EU internal market. (Bouwen, 2002; 2004).

Indicators: the members of a European association of regions, the members of a European coalition of regions, the co-signs of a lobbying message; information on the needs and interests of European regions regarding Air Quality policy.

2B. Information about the Domestic Encompassing Interest: the information required from the public and private sector on the Domestic Encompassing Interest (DEI), regarding the aggregated needs and interests of a sector in the domestic market. (Bouwen, 2002; 2004)

Indicators: the members of a Dutch association of regions, the members of a Dutch coalition of regions, the co-signs of a lobbying message; information about the interests of Dutch regions regarding Air Quality policy, information about the needs and interests of Dutch regions regarding Air Quality policy.

2C. Information on the public opinion: information about the way the general public, i.e. the citizens of the EU, think about a policy proposal.

Indicators: polls; voting information; petitions; facts, figures, (non-)numerical data on the opinion of European people on EU policy.

3. Insider strategies: communication strategies in which policy makers are contacted directly, through formal or informal networks, by using access to these policy makers (Boscheid & Coen, 2003; Beyers, 2004; Binderkrantz, 2005)

Indicators: position papers; reactions to green papers; reactions to white papers; completed questionnaires from internet consultations; completed questionnaires from impact
assessments; proof of attended meetings (e-mails, summaries, feedback, presentations, verbal statement of interviewee); proof of involvement in expert group (e-mails, summaries, feedback, presentations verbal statement of interviewee); letter addressed to the officers of the European Commission; letters to members of EC expert groups; e-mails addressed to officers of the European Commission; e-mails to members of EC expert groups; verbal statements of interviewees that members of the European Commission have been spoken to face to face; verbal statements of interviewees that members of EC expert groups have been spoken to face to face.

4A. Information politics: the public presentation of information, with the purpose of signaling information to key policy-makers, without direct contact with them.

Indicators: published press releases (online, in magazines, newspapers or other media); written letters or e-mails to editors of papers or magazines; proof of participation in debates in the press (in the form of news coverage, or an official statement of an interviewee); published reports, published analyses, published folders and brochures; disseminated views on websites of the regions or region-affiliated parties; proof of arranged public meetings and public conferences group (e-mails, summaries, feedback, presentations, verbal statement of interviewee); co-signs of letters or other signs of coalitions or associations.

4B. Protest politics: events that are explicitly staged and meant to attract attention and expand conflict regarding a policy issue (Beyers, 2004, p. 214).

Indicators: organized manifestations and demonstrations; staged street actions; organized strikes; calls for civil disobedience; organized letter writing campaigns; organized petitions.

The semi-structured interviews were operationalized by developing an interview manual, or topic list, that was used as a guideline. The beforehand prepared manual contained a number of topics that the researcher needed to discuss (Van Thiel, 2014): the information types that were communicated to the European Commission(1), and the ways in which they were were communicated (2). Attention was also given to their perceived effectivity in the case of air.
quality, and questions were asked on the general lobbying relationship between the European Commission and the lobbying parties.

The used interview manuals for interviews with lobbyists differed slightly from the used interview manuals for interviews with European Commissioners, because of their different perspectives on the lobbying trajectory. Also, in order to make sure that the respondents understood the questions and would give the best answers, a document explaining the subject matter of this thesis was sent to them beforehand. Both types of interview manuals, as well as the document for respondents, can be found in the appendices.

4.6 Analyzing techniques
The analysis of this thesis was done by reading all the collected documents and conducted interviews, and assigning codes to the corresponding content, using the formulated indicators. The coded content could be as small as one sentence, or as big as a whole section in the documents. A specific system of ‘scores’ was not formulated; if a certain piece of information indicated the presence of a code, the code and its related information type or way of communication was immediately marked as present in the informational lobbying strategy of the Dutch provinces and their coalition partners.

Furthermore, memos were written during the coding process when particularly interesting or important content was read, in order to be sure that no findings or insights were lost (Saldana, 2009, p. 32). All of this was done on the computer using Atlas.ti. ATLAS.ti allowed the researcher to digitally store the data in a database structure, which sorted the interview transcripts, and the scanned documents, collected in The Hague (IPO) and Brussels (HNP). ATLAS.ti made it possible to code the material in an efficient and precise way (Van Thiel, 2014).

4.7 Validity and reliability
According to Babbie, ‘reliability is a matter of whether a particular technique, applied repeatedly to the same object, yields the same result each time’ (2005, p. 141). Validity refers to ‘the extent to which an empirical measure adequately reflects the real meaning of the concept under consideration. For example: our IQ would seem a more valid measure of your intelligence than would the number of hours you spend in the library’ (Babbie, 2004, p. 143).
In this thesis, a singular case study was done. In order to make it as reliable and valid as possible, it was done with an emphasis on the triangulation of methods. Triangulation of methods can be defined as ‘a way of collecting or processing information by using different operationalizations, data sources, researchers, or methods’ (Van Thiel, 2014, p. 92). According to literature, triangulation of methods supposedly eliminates coincidence and increases the validity and reliability of the results (Timney Bailey, 1992; Verschuren & Doorewaard, 2007; Van Thiel, 2014). The belief is that, by taking a diversified approach, the researcher can gather as much information as possible, and as a consequence can ensure that the collected data are valid, irrespective of the number of units studied (Van Thiel, 2014). In this thesis, qualitative content analysis was done in combination with semi-structured interviews, in order to obtain as much data on the air quality case as possible.

Given the fact that qualitative content analysis was used as a method, it can be said that the reliability of this research was high. If done again, the same documents would have been collected, and based on the deductive nature of this thesis’ operationalization, the same results would have been rendered from the analysis. Moreover, qualitative content analysis as a method is fairly unobtrusive, and the researcher thus did not have to interfere with the research situation in order to collect the data. This reduced threats to validity and reliability (Babbie, 2004, p. 324; Van Thiel, 2014, p. 102; see also Creswell, 2014). It has to be said, though, that the different variables on information types interrelated quite a bit. This negatively affected the validity of this research. The fact that all the assessed documents were fixed and already existent, did not affect the validity of this research in a positive way either, as documents not always correctly reflect reality, important information could be withheld from the researcher and the data collection could be incomplete (Babbie, 2004, p. 324; Creswell, 2014, p. 192). In order to tackle this problem, semi-structured interviews were held as well, as they posed a way to gather extra information, and complement and crosscheck the previously collected information on the informational lobbying strategy of the Dutch provinces in a more flexible way.

Concerning the conducted interviews, fully structured interviews would have been the best option in order to maximize the reliability of the research. If all interviews contained exactly the same line of questioning, they would have been extremely high in reliability (Babbie, 2004, p. 275). At the same time, however, fully structured interviews would have constrained the validity of the research.

As a result of semi-structured interviews, every interview slightly differed from the other. Also, conducting the interviews and processing the data afterwards required considerable
skill (Van Thiel, 2014); in that sense, it is possible that the level of skill of the researcher affected
the validity and reliability of this research in a positive or negative way. However, the flexible
format of the interviews in this thesis made sure that extra information was collected on the
studied information types and ways of communication, enlarging their validity, and an interview
manual was developed in order to guard the reliability of this study. Also, the reliability of the
findings from the interviews are enhanced by recording and transcribing them, following Van
Thiel (2014).

Finally, the use of ATLAS.ti to code the collected data enhanced validity and reliability
of my research, because it forces me to use a systemic approach. The systemic approach enabled
that the results of the study could later be repeated (reliability) and gain credibility (validity)
(Van Thiel, 2014, p. 138).

4.8 Summary
In this thesis, the informational lobbying strategy of the Dutch provinces was evaluated. A
process evaluation was done, as opposed to a plan or product evaluation (Verschuren &
Dooreward, 2007) Qualitative research was conducted, given the fact that in line with the topic
of this thesis, informational lobbying, non-numerical data stood central. A singular case study
was conducted, instead of a multiple case study, due to reasons of time and feasibility. The
chosen methods of data collection and analysis were qualitative content analysis and semi-
structured interviews. These two methods allowed the researcher to acquire a complete-as-
possible view of the informational lobbying strategy of the Dutch provinces. The qualitative
content analysis was deductive in nature, which means that the operationalized codes and
indicators were derived from theory as presented in chapter 3 of this thesis. The actual work of
analysis was done by reading all the collected documents and assigning codes to the
corresponding pieces of content. No system of scores was used; if a code was assigned, the
corresponding information type of way of communication was evaluated positively. The
amount of assigned codes, or the amount of content assigned with a certain code, were not seen
as relevant for this evaluation. Finally, attention was devoted to the reliability and validity of
the collected data and the used research methods.
Chapter 6.

Analysis & results

This chapter consists of two parts. The first part consists of a short case description of the review of the Thematic Strategy on Air Quality. What happened between 2011 and 2014, which parties were involved, and what were the Dutch provinces exactly trying to achieve with their lobby on the review of the Thematic Strategy? The second part of the analysis contains an in-depth assessment of the informational lobbying strategy of the Dutch provinces, focusing on the communicated information types on the one hand, and the used ways of communication used on the other.

3.1 Case description

In this section the researched case of the review of the Thematic Strategy on Air Quality is described, before proceeding to an in-depth assessment of the informational lobby of the Dutch provinces on the review of the Thematic Strategy on Air Quality.

The starting point of this case description is 2005. In 2005, the European Commission published the first Thematic Strategy on Air Pollution, or air quality, with for example standards for vehicle engines and so-called national emission ceilings. Six years later, in January 2011, the European Commission gave a mandate for review, recognizing the pressing needs for action to improve air quality (European Commission, “Review of the EU Air policy”). The air quality review was going to address several issues, amongst which new standards for vehicle engines, i.e. EURO6-regulation, and new national emission ceilings, i.e. NEC-regulation (European Commission, 2013b). Moreover, the European Commission involved multiple stakeholders in revising the Thematic Strategy. To illustrate this: five Stakeholder Expert Group (SEG) meetings were planned, of which the participants were carefully selected. They were held respectively on 6/7 June 2011, 19/20 January 2012, 21 June 2012, 5 December 2012 and 3 April 2013. Also, two public consultation rounds were held, to which everyone could reply, and besides these formal ways of deliberation, the European Commission deliberated with parties in an informal manner (European Commission, “Review of the EU Air policy”).
The review trajectory of the Thematic Strategy on Air Pollution lasted three years, until the end of 2013. Needless to say, the Dutch provinces, as well as numerous other interest groups, tried to lobby the European Commission during this period, in an effort to influence their policy.

To be specific, the Dutch provinces lobbied for stricter source-based policy, and in turn less strict, or at least more reasonable national emission ceilings. Despite the fact that the Dutch provinces agreed on the importance of clean air with the European Commission, and tried to comply with the regulation of the 2005 Thematic Strategy on Air Pollution, this had not been easy for them. The provinces were expected to meet certain air quality standards and as a consequence, only so much fine dust particles were allowed in the air per square kilometer per region. However, whilst the provinces did everything they can, they did not manage to do meet these standards. Furthermore, whilst the standards and rules for the maximum amount of pollutants in the air were very strict, the standards and rules for the emission of pollutants of heavy machinery, vehicles, ships and other industry, i.e. the actual sources of the air quality pollution, were not as strict. As a result, it was impossible for the provinces to comply with the 2005 air quality standards (personal communication, lobbyist A; B; Interprovinciaal Overleg, 2012; AIR Quality Initiative of the Regions, 2012c) As a result, logically, the Dutch provinces and their coalition partners in Europe lobbied for more and stricter source-based policy, in order for them to be able to comply with the set emission ceilings. A fairer policy was needed: in the new reviewed Thematic Strategy on Air Quality the European Union should not make regulation on emission ceilings more severe, if they would not do the same for the regulation of (heavy) machinery and industry, i.e. the actual sources of the air pollution (Interprovinciaal Overleg, 2012). Ideally, less strict national emission ceilings were needed, and more strict source-based policy.

In December 2013, environment Commissioner Janez Potočnik presented the new Thematic Strategy on Air Quality. In the official publication, the European Commission presented their new plans and measures to ‘clean up Europe’s air’ (European Commission, “Environment: New Policy Package to Clean Up Europe’s Air”). It consisted of a number of components. First off, National Emission Ceilings Directive was revised, and now included stricter national emission ceilings for the six main pollutants, and a directive was presented with rules to reduce pollution from medium-sized combustion installations. As of now, there were rules about energy plants and small industry installations, and what they were allowed to produce in terms of pollution (European Commission, “Environment: New Policy Package to
Clean Up Europe’s Air”; European Commission, 2013b). In other words: the Dutch provinces got their source-based policy.

Before concluding this case description, it is important to elaborate on the form in which the Dutch provinces lobbied the European Commission. First of all, the provinces (consisting of the 12 individual provinces and umbrella organizations IPO and HNP) were in a coalition with the association of Dutch municipalities (VNG). Second of all, the Dutch provinces were a member of the Committee of the Regions, and of the Council of Municipalities and Regions. Third of all, the provinces were part of a broad network of regions with similar interests, called the Air Initiative of the Regions. Fourth of all, the provinces were through their coalition with the Dutch association of municipalities involved in EUROCITIES, an organization of cities across Europe. Finally, as the Dutch provinces lobbied in close cooperation with these five other organizations, in this analysis the informational lobbying output of all these organizations is assessed, in order to analyze the informational lobbying strategy of the Dutch provinces.

To summarize this case description: the European Commission reviewed their 2005 Thematic Strategy on Air Pollution during a period of three years, starting in 2011. During this period, the Dutch provinces and their coalition partners mainly lobbied for more source-based policy, because without it, it was impossible for them to comply with EU standards on air quality, and they seemingly succeeded.

3.2 Assessment of the informational lobbying strategy of the Dutch provinces

In this section, the used informational lobbying strategy is assessed, analyzed and evaluated. First, this is done for the communicated information types. Then, this is done for the used ways of communication.

3.2.1. Communicated information types

Technical information

Experiential/feasibility information

The analysis of the information shows that the provinces and their coalition parties communicated experiential/feasibility information in multiple forms.
First of all, the provinces and their coalition partners communicated experiential/feasibility information by explaining the practical implementation problems that they encountered when implementing EU air quality policy (Regio Randstad, “Consultation on options for revision”, p. 5; Committee of the Regions, 2012b, p. 14) The excerpt below serves as an example: it illustrates the difficulties that policy makers of European regions faced when trying to transform European policy to regional policy.

‘The current regime of limit values is extremely complex - there are seven limits or target values for particulate matter alone. Faced with a panoply of targets, it is hard for policymakers to focus on measures where they will have the maximum impact to protect public health. It also makes it difficult to communicate the air quality problem to the public (Regio Randstad, “Consultation on options for revision”, p. 5)

Second of all, the provinces communicated experiential/feasibility information in the form of information containing reasons for compliance problems (Committee of the Regions, 2012b, p. 14; Interprovinciaal Overleg, 2012, p.2). This form of experiential/feasibility information might seem similar to the aforementioned indicator ‘explanation of practical implementation problems’. However, while the information on implementation problems was sent to point out practical difficulties for policy officers in implementing or transposing the EU policy, the explanation of compliance problems concerned the reasons why the rules or standards of the European Commission, as set in their policy, were actually very difficult to meet. The quote below shows the subtle difference between practical implementation problems and more general compliance problems.

‘[The Commission] points out that the limit values for PM\textsubscript{10} are very difficult to comply with in some places. This may be due to local circumstances, local sources, certain specific meteorological conditions and/or periods of large-scale air pollution. Long-distance goods transport can also contribute significantly to the overall load. With a view to the desired flexibility, the Committee suggests examining whether the annual average limit value could be used for checks on the basis of multi-year average concentrations’ (Committee of the Regions, 2012b, p. 14)
Thirdly, the Dutch provinces and their coalitions communicated experiential/feasibility information in the form of possible solutions to these compliance problems: the third variation of experiential/feasibility information. An example of this form of experiential/feasibility information is given below.

‘However, we need the Commission’s support and assistance in addressing air pollutant emissions. Without this support it is difficult for us to deliver further improvements in air quality in our regions and cities as not all cost-effective tools are available to us or, alternatively, any improvements we do deliver are undermined by policy failures in other areas over which we do not have control. (…) Specifically, we request support to address ongoing issues with Euro standards, tackle tire and brake wear, strict regulations for biomass combustion (wood burning and address the process of dieselization, without forgetting that direct injection petrol vehicles are also important sources of PM emission’ (Air Initiative of the Regions, 2013b)

The quote also shows how the different variations of experiential/feasibility information were often interrelated: compliance problems are stated (it is difficult to deliver further improvements in air quality), reasons for compliance problems are stated (a practical one being that not all cost-effective tools are available, a general one that improvements are undermined by policy failures in other fields), and finally solutions to these compliance problems are proposed (tackle tire and brake wear and strict regulation for biomass combustion).

Fourthly, the Dutch provinces and their coalitions communicated experiential/feasibility information by pointing out how EU air quality was ineffective, and could be made more effective. It is worth noting that this information type was not necessarily related to implementation or compliance problems. The Air Initiative of the Regions for example pointed out that ‘certain Eurostandards were the primary policy lever to reduce emissions from vehicles’ and ‘have been proven to be ineffective’ (Air Initiative of the Regions, 2012c, p.4). In other words, the Eurostandards were not necessarily impossible to implement, nor did implementation lead to problems, but they just did not have the effect they were supposed to have.

Finally, the Dutch provinces and their coalition partners communicated experiential/feasibility information by giving examples and descriptions of how they actually carried out EU air quality policy in practice, and by explaining their best practices. The Air Initiative of the Regions did this the most. In their to Commissioner Janez Potocnik, for
example, as well as in several presentations (Cousins, 2011) and other AIR documents (Air Initiative of the Regions, 2012a) the at that time current activities and best practices of each involved region were presented.

It is worth noting that in the conducted interviews, multiple respondents stated that the communication of experiential/feasibility information was important in the case of air quality (personal communication, lobbyist D; lobbyist E). This supports the notion that the related evaluative precondition is valid.

In sum, it can be stated that the Dutch provinces and their coalitions communicated experiential/feasibility information at large and in numerous ways, hereby meeting precondition 1.1 for effective lobbying.

Legal information

When looking at the specific indicators of legal information, it becomes clear that the Dutch provinces and their coalitions hardly communicated legal information in the form of judicial language, or in the form of judicial articles. They rather communicated legal information in the form of advice on, or suggestions on how the European Commission could alter existing regulation, and in turn improve it (CEMR, 2013, p. 8; Regio Randstad, “Consultation on options for revision”, p. 6). One respondent confirmed this view on the use of legal information. When the Air Initiative of the Regions found out that certain sources of pollution were not yet covered by European legislation, they did not start writing legal articles on these sources of pollution, but rather suggested that the European Commission should act in this field (personal communication, lobbyist E). To give a couple of examples, the provinces stated that ‘only through the synchronization of the NEC-directive with the directives 2008/50/EG and 2004/107/EG, different ambition levels on air quality could be improved’, and the Committee of the Regions suggested combining ‘the revised version of the directives on ambient air quality and cleaner air for Europe’ with ‘the revised version of the directive on national emission ceilings’ (Interprovinciaal Overleg, 2012, p. 12; Committee of the Regions, 2012b, p.2)

Besides the aforementioned indicator of legal information, the Dutch provinces and their coalition partners communicated legal information by pointing out how EU air quality policy was not in sync, did not comply, or even collided with existing regional policy, other EU policy and/or existing international treaties or guidelines. The quote below, taken from Eurocities’ response to the second air quality consultation, serves as an example.
‘Generally speaking, the WHO guideline values on pollutant concentrations are useful in providing orientation for setting long-term air quality objectives. However, the WHO values do not take into account feasibility and proportionality of air quality measures, and can therefore not be incorporated exactly into EU limit values.’ (EUROCITIES, 2011b, p.8; see also EUROCITIES, 2013a, p. 6)

In sum, it can be stated that the Dutch provinces and their coalitions did communicate legal information, hereby meeting precondition 1.2 for effective lobbying. It is worth noting that they not necessarily communicated legal information in the form of judicial pre-written legal articles in judicial language, but rather pointed out ways in which the European Commission could or should alter their policy for the better.

**Technical data and information that makes technical data understandable**

The provinces and their coalition partners communicated technical data and information in multiple ways.

First of all, the Dutch provinces and their coalitions communicated this information type in the form of referencing and explaining new scientific findings and research reports. In their response of a consultation round, EUROCITIES referenced to new scientific findings and research reports of ‘project ICAROS’ and ‘the CITEAIR project’ (EUROCITIES, 2011b, p.9; p.11), the Committee of the Regions mentioned scientific findings and research outcomes of the Dutch National Institute of Public Health and the Environment in their Outlook Opinion (Committee of the Regions, “Committee of the Regions Outlook Opinion”, p. 15), and the Air Initiative of the Regions spoke of ‘the latest scientific evidence’ suggesting that ‘tyre and brake wear may be responsible for 75% of PM10 emissions from the transport sector’ (AIR Initiative of the Regions, 2013b, p. 3).

Second of all, on multiple organized conferences, the Air Initiative of the Regions gave very detailed presentations in which new data, new scientific reports and newly published analyses were presented. One of the best examples of this is the presentation of Stefan Hausberger, PhD in Automotive Engineering at the University of Graz, who presented his research on diesel engines as a source for PM emissions. His research provided new numerical data and new measurements of air quality; provided a detailed, professional explanation of the presented new data for the invited European Commissioners; contained proposals for new measures; contained explanatory graphs and tables and was in line with the Air Initiative of the Region’s call for more source-based policy. Literally all the operationalized indicators of
technical data and information that makes technical data understandable were present in this presentation (Hausberger, 2011).

Finally, the Dutch provinces and their coalition partners of AIR actually measured, collected and provided the European Commission with data from their regions, at the request of the European Commission (AIR Initiative of the Regions, 2012d).

The analysis of technical data and information that makes technical data understandable is an example of the importance of coalitions in lobbying, which will be elaborated upon in section 3.2.2. Multiple interviewed lobbyists stated that they believed this information type was important to communicate in the case of air quality (personal communication, lobbyist D; lobbyist A; lobbyist E). Several interviewed European Commissioners confirmed this view. One respondent stated that the European Commission always starts with a factual analysis first before any policy is written, admitting the importance of technical data and information that makes technical data understandable: ‘before you start applying any criteria, you first have to understand: what do we know about the physical truth out there?’ (personal communication, European Commissioner B). Other respondents stated that this information type, if it is factual and provides new insights with which the European Commission can debunk or confirm statements and assumptions of other lobby groups, is arguably the most effective ways of lobbying there is (personal communication, European Commissioner C; European Commissioner D). The statements of both lobbyists and European Commissioners supports the evaluative precondition that technical data and information that makes technical data should be communicated is valid.

In sum, it can be stated that the Dutch provinces and their coalitions did communicate technical data and information that makes technical data understandable, hereby meeting precondition 1.3 for effective lobbying. All the operationalized indicators were found. In presentations from the Air Initiative of the Regions this information type was especially present.

Information about the economic, social, and environmental impacts of policy
The Dutch provinces and their coalitions partners did not at all communicate information about the economic impacts of proposed policy, information about the societal impact of proposed policy and information about the environmental impact of proposed policy. This might seem surprising, given the fact that all the previous information types were so obviously present. There is a logical explanation, however.
Following Chalmers (2013), information about the economic impact is defined as ‘information that states how a proposed policy will affect the (national, regional and/or local) economies of Member States (Chalmers, 2013), i.e. how a proposed policy will affect the commerce, employment or incomes in a Member State. Information about the societal impact is defined as ‘information about the social impact of policy, i.e. information that states how policy will affect the social fabric of the community and the well-being of the individuals and families of a Member State’s society’ (Chalmers, 2013; www.businessdictionary.com). Information about the environmental impact is defined as ‘information that regards the consequences that the proposed policy would have on the environment, if the policy would become official legislation’ (Chalmers, 2013). Although each of these definitions are slightly different, depending on which kind of impact they focus, they have one thing in common: they revolve around the impact on the economy, society and/or environment, should the European Commission make their policy proposal official legislation. This last element of the definition is pivotal in explaining the absence of these information types: since the European Commission did not publish an official policy proposal in the review phase of the Thematic Strategy on Air Pollution, the absence of these information types is not illogical. No green papers were published on the new Thematic Strategy, no white papers were published, and in general no concrete policy proposal saw the light. As a result, it was impossible for the Dutch provinces and their coalition partners to calculate, estimate or predict possible impacts on the economy, society or environment. Of course, they have communicated information with proposals on how to improve policy and solve compliance problems, as explained earlier in this chapter, and there are also examples of information in which they explain the impacts of those proposals (Hausberger, 2011, slide 16) However, following the theory about these information types and their accompanying definitions, the only conclusion is that information about the impacts is not communicated.

In sum, it can be stated that preconditions 1.4, 1.5 and 1.6 for effective lobbying are not met, with the added notion that these preconditions were in fact not possible to meet. In other words, the fact that the Dutch provinces and their coalitions partners have not met these criteria, does not affect the outcome of this evaluation in a negative way.

Preference information

Information about the European and Domestic Encompassing Interests
The Dutch provinces and their coalition partners communicated information about both the Domestic and European Encompassing Interest at large: every time when they voiced their compliance/implementation problems and the solutions to those, or every time when they proposed a judicial alteration, they simultaneously voiced information about the Encompassing Interests. In other words, information about the Encompassing Interests and technical information types typically overlap, and the researched variables as researched in this thesis are not entirely mutually exclusive.

Furthermore, when the Dutch provinces voiced their needs and interests through a coalition of European parties, this information classified as information about the European Encompassing Interest. When the Dutch provinces voiced their needs and interests individually or in a coalition with other domestic parties, this information classified as information about the Domestic Encompassing Interest.

Information about the European Encompassing Interest

The Committee of the Regions, CEMR, EUROCITIES and the Air Initiative of the Regions all communicated information about the European Encompassing Interest – or information about the Euregional Encompassing Interest, if you will. Two indicators stood out.

The first indicator was ‘information about the members of a European (Euregional) coalition’. In the spirit of stating who you are and where you come from, and creating ‘brand awareness’, the coalition of Dutch and other European provinces and municipalities communicated in almost each of their messages communicated information in which they stated who they are (see Air Initiative of the Regions, 2013b)

The second indicator that stood out was ‘information about the needs and interests of European member states’ regions regarding Air Quality policy’. Except for IPO/VNG, all the coalitions in which the provinces were active communicated this information type on a large scale (see for example CEMR, 2013, p. 3).

In sum, it can be stated that the Dutch provinces and their coalitions communicated information about the European Encompassing Interest, and **precondition 2.1 is hereby met.** It is important to note that information about the EEI generally complies with certain types of technical information - for example experiential/feasibility information, when solutions to compliance problems are suggested.
Information about the Domestic Encompassing Interest

The Dutch provinces were only speaking on their ‘Domestic Encompassing Interest’ when they lobbied by themselves, or when they lobbied in a coalition with other domestic parties, as they did with the Dutch municipalities (VNG). When looking at the different indicators for information about the Domestic Encompassing Interests, two indicators stand out.

The first is the indicator ‘information about the members of a domestic or regional coalition’. In the spirit of stating who you are and where you come from, and creating ‘brand awareness’, the coalition Dutch provinces and municipalities in each message communicated information in which they stated who they are. As an example, in nearly every official paper of IPO/VNG it was stated that VNG represents 415 Dutch municipalities, and that IPO represents the 12 Dutch provinces (Interprovinciaal Overleg, 2012, p.4).

The second indicator that stood out is ‘information about the needs and interests of an EU member state or its regions regarding Air Quality policy’. The Dutch provinces and municipalities mainly communicated information about the Domestic Encompassing Interest in this form, and everytime IPO/VNG communicated its wants and needs to the European Commission, this accounted for information about the Domestic Encompassing Interest.

‘De Nederlandse decentrale overheden investeren in schone lucht. De laatste tien jaar zijn de concentraties fijn stof met 25% afgenomen. Echter, ondanks de maatregelen die decentraal genomen kunnen worden, lukt het gemeenten en provincies waarschijnlijk niet om alle grenswaarden voor luchtkwaliteit tijdig te halen. De luchtkwaliteit kan alleen adequaat aangepakt worden als één overheidslagen hun verantwoordelijkheden nemen. VNG en IPO zijn voorstanders van een versterkt luchtkwaliteitbeleid op Europees niveau. Met name een versterkt EU-bronbeleid is noodzakelijk’ (Interprovinciaal Overleg, 2012)

This quote voices the needs and interest of the Dutch provinces and municipalities, by stating what their compliance problems are and how they would like to solve these compliance problems. It proves how information on the Encompassing Interests and experiential/feasibility information and other types of technical information, often comply with each other.

In conclusion, it can be stated that the Dutch provinces and their coalition partners communicated information about the Domestic Encompassing Interest, hereby meeting precondition 2.2 for effective lobbying. It is important to note that information about the DEI
generally complies with types of technical information, for example experiential/feasibility information, when solutions to compliance problems are suggested.

**Information about the public opinion**

Information about public opinion was hardly communicated in the information lobby of the Dutch provinces and their coalition partners. There are only two examples of information on the public opinion to be found (Interprovinciaal Overleg, 2013; Committee of the Regions, 2013b) The fact that the Dutch provinces and their coalitions communicated so little information on the public opinion, can be explained by three things. First off, because of the technical character of the European air quality policy, the European Commission foremost needed technical types of information, and information on the public opinion was less necessary for the Dutch provinces to communicate (personal communication, lobbyist A; lobbyist D; lobbyist E). Second off, because of the technical character of the air quality policy in combination with the complicated EU policy cycle, the general public did not get familiar with, and did not form an opinion on air quality policy (personal Communication, lobbyist A). Third of all, as one respondent stated, the European Commission itself had several very good instruments for measuring the public opinion themselves, making information on the public opinion from the Dutch provinces abundant (personal communication, lobbyist E).

Finally, on a more abstract level, it was stated that there is up until now no conclusive way of correctly involving the public opinion. As one respondent explained, it is absolutely important that the public opinion is taken into account, but unfortunately this is a complicated process. How do you make sure that issues that are terribly complicated, like Air Quality, are explained well to the general public, without running the risk that citizens are manipulated? In line with this, how do you make sure that the issue at hand are not oversimplified in the effort to explain them to the general public, and not unimportantly: exactly how will you ask for their opinion? (personal communication, lobbyist B).

In conclusion, it can be stated that the Dutch provinces and their coalitions communicated information about the Public Opinion, hereby meeting precondition 2.3 for **effective lobbying**, although this information type was communicated extremely little. Interviews with the respondents revealed at least four good reasons for this, leading to the idea that the theoretical precondition that information on the public opinion should be communicated as part of an effective informational lobbying strategy, might be less valid than previously assumed.
Other findings on information types

Blurred information types

This analysis has thus far showed the Dutch provinces and their coalition parties communicated different types of technical information and different types of preference information, in line with the theoretical preconditions that all these information types should be communicated. However, this analysis also showed that technical and preference information types in the case of Air Quality were typically blurred, showed overlap and were interrelated.

Generally, it can be said that technical information is an integral part of a lobbying message that voices a preference. In other words, technical information is communicated in order to convince that a certain preference is well-founded, and sometimes the two can be regarded as one and the same. In line with this, several respondents stated that it is very hard to distinguish between technical and preference information (personal communication, lobbyist B; lobbyist D; European Commissioner A). This implicitly criticizes the theoretical notion that all these different information types should be communicated to the European Commission. Moreover, respondents have stated that the information types that should be communicated to the European Commission very much depend on the case and the actual lobbying message the interest group wants to convince the European Commission of (personal communication, lobbyist A; lobbyist B). As a lobbyist, you send the information that you need in order to make your point, in other words. Sometimes this information contains legal information and experiential information and sometimes it contains information about the public opinion, or information about the impacts. It varies.

What is important when it comes to communicated information types, is that the information is sound, honest and substantiated by facts (personal communication, European Commissioner B; European Commissioner C; European Commissioner D) Lobbyists and European Commissioners alike state that this is the most important aspect of communicating information, when wanting to exert influence. Naturally, it is not illogical that new scientific studies or research reports contain this info, but it is also well possible that the eyes of a European Commissioner are opened with experiential/feasibility information, legal information, or information about the impacts. In that sense, whilst this analysis showed that experiential/feasibility information and technical data and information that makes technical
information were undeniably useful in trying to influence the European Commission, the most striking finding of all is that the theoretical premise that a number information types should at all times be communicated to the European Commission as a part of a successful informational lobbying strategy, arguably is not that realistic. Moreover, saying that a lobby is bad, because it lacks certain communicated information types, may be a false statement.

*Logic of informational lobbying*

The findings of this research also nuance the view on the logic of informational lobbying, as described in chapter 3, section 3.2 of this thesis, in which a strong resource dependency between the European Commission and interest groups is assumed. Following Bouwen (2002, 2004) and Klüver (2012) the logic of informational lobbying assumes that the European Commission does not have the time or manpower to gather all the information that is needed in order to make new policy, and the providing of this information by interest groups is therefore necessary, useful and a way to influence the European Commission.

However, several respondents of the European Commission have explicitly stated that this view of informational lobbying is exaggerated. Yes, it is important for the European Commission that interest groups like the Dutch provinces provide information, and yes, it is possible to influence the European Commission through the provision of information. It is not the case, however, that the European Commission does not have the time or manpower to gather information, and in turn cannot make policy by itself. The European Commission actually acquires nearly all technical information itself, through research of EC departments or by outsourcing this research to impartial research institutes – as one respondent stated, ‘the European Commission has tremendous resources’ (personal communication, European Commissioner A; European Commissioner C; European Commissioner D). The information that interest groups provide is in fact used and therefore important to cross-check this information, and to find out what possible policy directions can be taken in order to represent the interests and satisfy the needs of as much involved stakeholders as possible. In that sense the European Commission is thus not dependent on third parties because of a lack time and personnel, like Bouwen and Klüver say, but it uses third parties in order to find out what all their preferences are, to ensure it operates in a way that is as democratic and representative as possible, and to double-check the validity of their own information. In line with this, the
European Commission arguably is dependent on third parties, but not because of a lack of time and personnel.

In sum, the statements of the European Commissioners nuance the view on the logic of informational lobbying in terms of the nature and strength of the dependency of the European Commission on third parties, but they do not undermine the notion that information is useful & important for the European Commission, and interest groups can and should communicate information in order to influence the European Commission. All interviewed respondents stated the importance of providing the European Commission with preference as well as technical information and as one European Commissioner said: ‘the European Commission will not come look for you. You should come to the Commission.’ (personal communication, European Commissioner A).

Conclusion on communicated information types
This section has shown that the provinces and their coalitions communicated technical as well as preference information to the European Commission, hereby meeting precondition 1 and 2.

Concerning technical information, experiential/feasibility information, legal information and technical information and information that makes technical information understandable were communicated, meeting preconditions 1.1, 1.2 and 1.3. The last three types of technical information, however, have not been communicated at all: information about the social, economic and environmental impact of the proposed policy are missing and preconditions 1.4, 1.5 and 1.6 are therefore not met. Consequently, in terms of evaluation, the provinces strictly would not get a perfect score, since not all the information types have been communicated. However, since European Commission did not publish green or white papers in the review trajectory of the Thematic Strategy on Air Pollution, it is only logical that these last three types of technical information were not present in the documents. One cannot explain the effects of not-yet-existing policy.

Concerning preference information, information about the European Encompassing Interest, information about the Domestic Encompassing Interest and information on the public opinion was communicated, although the last mentioned information type was voiced extremely little. Still preconditions concerning preference information, precondition 2.1, 2.2 and 2.3, were met. This leads to the conclusion that all the technical and preference information
types that were possible to communicate were communicated, which is in terms of evaluation the wanted outcome.

3.2.3 Used ways of communication
This section provides information about a second set of conditions for lobbying success: the ways of communication lobbyists used to convey their message. The used insider strategies and the used outsider strategies are assessed, since insider and outsider strategies are both marked as necessary preconditions of an effective informational lobbying strategy.

Used insider strategies
The Dutch provinces and their coalitions used multiple insider strategies, which are discussed below.

Position papers
First of all, the Dutch provinces and their coalition partners used the insider strategy of composing and communicating a position paper at large. IPO/VNG presented a position paper (Interprovinciaal Overleg, 2012), the Air Initiative of the Regions presented a position paper (Air Initiative of the Regions, 2012c) and CEMR presented a position paper Council of European Municipalities and Regions, 2013) The Committee of the Regions did not exactly present a position paper, but did file a so-called Outlook Opinion, which can be seen as an elaborate version of a position paper (Committee of the Regions, 2012b) The only coalition partner that did not compose and communicate a position paper before the publishing of the reviewed Thematic Strategy on Air Pollution was EUROCITIES, for unknown reasons.

Multiple respondents indicated that position papers were an important insider strategy, adding validity to the theoretical precondition that (all) insider strategies should be used as a part of an effective informational lobbying strategy. It is worth noting, however, that position papers were important as a way of communicating information, but rather as a way of getting the internal organization in order: firstly, position papers served as a means for the different lobbying organizations to acquire a shared stance on new air quality legislation: what do we think about this? A position paper would force the Dutch provinces and their coalition partners to formulate a relevant lobbying message, underlined by the constituents of their lobbying organizations. Secondly, a position paper formed a lobbying organizations’ reference book, for
all the associated lobbyists to use, so they could at all times make sure they communicated the right message and the right information. Furthermore, it is important to note that the position papers of the Dutch provinces and their coalition partners were not formulated and sent in reaction to a green or white paper. The European Commission did not publish a green or white paper in the case of Air Quality, so this was not possible. The Air Quality case proves that position papers are formulated and sent regardless of green or white papers.

Internet consultation rounds

The Dutch provinces and their coalition partners took part in consultation rounds. There were two consultation rounds according to the European Commission website (www.ec.europa.eu). The first public consultation, on the scope of the review, launched on 30 June 2011. The second one ran from 10 December 2012 until 4 March 2013 on the European Commission’s ‘Your voice in Europe’ web pages (ECORYS, 2013). This second consultation round entailed two types of questionnaires: one for the general public, and one for experts and stakeholders (ECORYS, 2013).

IPO/VNG took part in both consultation rounds, both as an expert and a stakeholder. The first consultation questionnaire was filled in by Johan Voerman on behalf of IPO/VNG (Interprovinciaal Overleg, 2011). The second consultation questionnaire was filled in by several individual provinces (Zuid-Holland, “Consultation on EU air quality legislation Questionnaire 2 for experts and practitioners”; Utrecht, “Consultation on EU air quality legislation Questionnaire 2 for experts and practitioners”; Regio Randstad, “Consultation on options for revision”) and umbrella organization IPO (Interprovinciaal Overleg, “Consultation on options for revision”). By taking part in the consultation individually and as a whole, the Dutch provinces aimed to communicate the provinces’ viewpoints in as many ways as possible. In their opinion, this could enlarge their chances of influencing the European Commission (Regio Randstad, “Oplegnota voor Portefeuillehoudersoverleg Milieu”)

EUROCITIES took part in both consultation rounds (EUROCITIES, 2011b; EUROCITIES, 2013a) as an ‘expert and stakeholder’, as did the Air Initiative of the Regions (personal communication, lobbyist E; lobbyist D). CEMR and the Committee of the Regions did, based on the available documents and interviews, not partake in any of the consultation rounds.
Impact assessments

The provinces also took part in an impact assessment (personal communication, lobbyist A; lobbyist D; lobbyist E). The executed document analysis did not provide any evidence or additional information on this, unfortunately, nor did the respondents remember the impact assessment in detail.

Take part in expert groups

The provinces and their coalition partners took part in expert meetings. In the Stakeholder Expert Group (SEG) meetings that the European Commission initiated in the case of Air Quality, members of the Dutch provinces did not have an official place at the table, and were therefore not directly present to make their point. However, several lobbying partners of the Dutch provinces were present at the meetings, demonstrating the importance of coalitions and networks when lobbying the European Commission.

‘With the expert group we stayed in touch as well. We knew someone from the municipality of Amsterdam [Harry van Bergen], and he was a member of the expert group. He was Dutch too, so you directly had an understanding. There was also someone from EUROCITIES in the expert group, from London, with whom we had good contact. (...) The Committee of the Regions also had a place, I think. Yes, Karsten Braun, the environment officer of the Committee of the Regions was a member. With him we had contact as well.’ (personal communication, lobbyist A)

Other persons that the provinces and their coalition partners knew were Johan Voerman of DCMR Rijnmond and, through AIR-network coalition partner Matteo Brumati, several Italian policy officers (personal communication, lobbyist E). Through these people, the viewpoint of the Dutch provinces (IPO/VNG) and their coalition partners could still be communicated to the Commission.

Furthermore, through the people ‘on the inside’, the provinces and their coalition partners could keep up to date on what was discussed in the expert meetings, and what the European Commission was dealing with at the time. This was possibly more important than
actually sitting at the table, one respondent stated (personal communication, lobbyist A). Based on information on what was happening in the European Commission, the Dutch provinces could decide what the appropriate next steps were in their lobbying strategy. Johan Voerman sent actual summaries of the discussions and presentations after an expert meeting. Based on Voerman’s documents, he at least attended the Stakeholder Expert Group meetings of 19-20 January 2012 and 21 June 2012 were attended (Voerman, 2012a; 2012b).

**Phonecalls, e-mails, letters and face-to-face communication**

Finally, the Dutch provinces and their coalition partners used the insider strategies of making phonecalls, sending e-mails, sending letters and arranging face-to-face communication (AIR Initiative of the Regions, 2013b; personal communication, lobbyist A; lobbyist D; lobbyist E). For the Dutch provinces these strategies were particularly important as a means of convincing the European Commission of their viewpoints, and as a means of maintaining the relationship with European Commissioners and other relevant policy officers. As one respondent stated, the provinces did not have an institutional place in the EU decision making process, so they needed to rely on their regional-specific knowledge and their contacts in order to lobby in an influential manner in the case of air quality (personal communication, lobbyist A). The quote below shows that making phonecalls, sending e-mails and letters, and arranging face-to-face communication actually lead to influence in the case of Air Quality, again adding validity to precondition 3.

‘[Phone calls weren’t necessarily about repeating your lobbying message. Phone calls were very much about keeping in touch.] From both sides, too. At a certain point in time we found out that the European Commission picked Air Quality as theme for the green week. [Then we offered our help.] We also made an appointment at the DG Environment, stating that we could deliver people to speak at the green week – are you interested? We have enough experience! Eventually they asked us: do you want to organize a workshop about regional problems yourselves? We actually got a stage for ourselves during the green week, where we could let speakers talk that we chose. That is what lobbyists dream about, of course, that you get invited and do the talking yourself at a Commission workshop.’ (personal communication, lobbyist A)
Concluding this section on insider strategies, it can be stated that the provinces used all possible insider strategies, hereby meeting precondition 3 for effective lobbying. No position papers were sent in reaction to a green or white papers, but that is because these were not published in the review trajectory of the Thematic Strategy on Air Pollution. Also, the Dutch provinces did not have a seat at the table at the Stakeholder Expert Meetings, but they had multiple coalition partners, or contacts through their coalition partners, who had a place at the Stakeholder Expert Meetings. Finally, it is worth noting that although insider strategies like position papers, the attending of expert meetings, making phone calls and sending emails were very useful, they were not necessarily used as ways to communicate information. They were mainly important as a means to keep up to date, and maintain the relationship with European Commissioners.

Outsider strategies
Looking at the outsider strategies, the Dutch provinces and VNG only used information politics in the case of air quality. Press conferences were held at least once (personal communication, lobbyist A), press releases were done (Randstad, 2012; Air Initiative of the Regions, 2011b), views were disseminated on the website, five conferences were organized by the Air Initiative of the Regions (2012b), multiple coalitions were formed (the most important ones being the coalitions with VNG, EUROCITIES and the Committee of the Regions), and an entirely new network was initiated (AIR Network of the Regions). ‘Write letter to editors’, ‘participate in debates in the press’ were not used by the Dutch provinces and their coalition partners, although through the Air Initiative of the Regions several debates were organized. Regardless, the majority of the information politics have been put to use, with an emphasis on public conferences, coalition-building and networking.

When asked about it, nearly all respondents, lobbyists and European Commissioners alike, indicated that the strategy of coalition building was important in the case of air quality, if not the most important. Since the European Commission looked for legitimacy, it was more likely to listen to a lobbying message that was carried out by a lot of interests. Secondly, the coalitions opened doors that normally would have remained closed; and thirdly coalitions greatly enlarged the available pool of information, which was in turn very useful in lobbying the Commission (personal communication, lobbyist A; lobbyist D; expert A; lobbyist B). The enlargement of the pool of information is clearly seen in the case of technical data and
information that makes technical data understandable. As several respondents made clear, the Dutch provinces individually were not very strong on the provision of technical data, but through the Air Initiative of the Regions they still were, as a result of the individual regions joining forces.

Furthermore, concerning ‘enlarging the pool of information’, the provincial network was also extremely important. Again, the Dutch provinces themselves did not have the resources to gather new air quality data and publish scientific reports, but research institutes like TNO (see www.tno.nl), DCMR Environment Rijnmond (see www.dcmr.nl) and the national government did (personal communication, lobbyist A). The provinces could in turn use their research and reports, and still provide the European Commission with technical data. ‘Networking’, therefore, could therefore be added to the list of outsider strategies, although not necessarily as a way of communication. Like the writing of position papers, networking is useful as a basic, preparatory strategy, in order to acquire information that in turn could be useful to communicate to the European Commission.

Respondents also described the organization of conferences as particularly important in the case of air quality, because it offered the provinces and their coalition partners a way to take control of the European policy process, which was in the review phase of the Thematic Strategy on Air Pollution quite unpredictable; and because, through the invitation and attendance of European Commissioners, the organized conferences actually lead to more inside access after the events (personal communication, lobbyist A). On a general note, several respondents stated that outsider strategies and insider strategies were both very important, and that outsider strategies in the case of air quality even increased the saliency of insider strategies (personal communication, lobbyist B). Also, the interviewed European Commissioners did not condemn the use of outsider strategies. One respondent even stated that ‘when an interest group through an outsider strategy manages to draw the attention from the European Commission for a certain issue, the European Commission is obliged to respond, since European Commissioners are bound to serve the public interest.’ These findings support the theoretical assumption that outsider strategies should be used as part of an effective informational lobbying strategy, hereby enforcing the validity of the theoretical framework.

Protest politics were not at all used by the Dutch provinces and their coalition partners. Respondents gave two important reasons for this. First of all, respondent stated that there is a certain danger to the use of protest politics, in a sense that it can backfire and lead to reputation loss, instead of influence (personal communication, expert B). Second of all, respondents
explained that protest politics generally create discomfort and obstruction, and that this undermines the relationship with European Commissioners and other lobbyists, instead of leading to influence (personal communication, lobbyist B; lobbyist D). In line with this, one European Commissioner stated that the use of protest politics would not necessarily convince him the interest group is right (personal communication, European Commissioner B). The given statements support the theoretical precondition that protest politics should not be used as part of an effective informational lobbying strategy, hereby enforcing the validity of the evaluative framework.

Concluding this section on outsider strategies, it can be stated that the Dutch provinces and their coalition partners used numerous outsider strategies, hereby meeting precondition 4 for effective lobbying. Moreover, protest politics were not used, which lead to the conclusion that evaluative precondition 5 for effective lobbying is met as well.

Other findings on ways of communication
Analyzing the collected documents and conducted interviews on air quality proved that the Dutch provinces and their coalition partners have not just lobbied the European Commission in trying to exert influence in the European Commission phase of the EU policy cycle. In the case of air quality, the Dutch provinces and their lobbying partners lobbied members of the European Parliament and members of national governments as well. As lobbyist A explained, the European policy process might seem linear and straightforward, with first the European Commission and after the European Parliament and the national governments playing their role in the policy process, but reality proves different. The European Commission, the Parliament and the Council of Ministers interact with each other constantly and take each other into account whilst doing their assigned tasks. As a result, it is very useful to not only lobby the European Commission, but also the institutions that come after: on the one hand because they will eventually become important in the policy process, but also because the European Commission holds the opinion of the other institutions in high regard, and the European Commission can therefore be lobbied indirectly through them (personal communication, lobbyist A). ‘Lobbying the non-EC institutions’ should therefore be added to the list of possible strategies that can be used in order to communicate information to and exert influence on the European Commission.
Conclusion on the used ways of communication

This section has shown that the provinces and their coalitions used insider as well as outsider strategies in order to reach the European Commission. Moreover, within outsider strategies they only used information politics, and did no use any protest politics. Consequently, all the preconditions regarding ways of communications were met, which is in terms of this thesis’ evaluation the wanted outcome.
Chapter 7.

Conclusion & recommendations

7.1 Introduction

This thesis started with posing a problem of the Dutch provinces, and sub national regions in general: they have little chances to influence the European policy process, since they do not have an official institutional place in the policy process. Simultaneously, however, they really need to influence the European policy process, since they are the ones to execute and implement this European Union-made policy, and a lack of influence can lead to implementation problems and/or compliance problems, possibly with financial consequences amongst others bad things to happen.

The Dutch provinces therefore try to influence the European policy process through informational lobbying: lobbying through the provision and distribution of informational content (Lohmann, 1995) and/or specialist information (Austen-Smith, 1993) by interest groups to decision-makers (Broscheid & Coen, 2003), without any contingent punishments or rewards (Gullberg, 2013), in order to influence policy formulation and decision-making in the European policy process of the European Union (Zibold, 2013; Gullberg, 2013). An informational lobbying strategy is in turn, is defined as a combination of communicated information types and used ways of communication. Concerning information types, there are types of technical and types of preference information. Concerning ways of communication, there are insider and outsider strategies. Furthermore, informational lobbying is preferably done in the beginning of the European policy process, the stage when the European Commission is developing policy or even before, since in this stage the least amount of the new policy is a given and the most influence can be exerted. The explained beginning stage of the European policy cycle is in this thesis defined as the European Commission phase.

Given the fact that the Dutch provinces and other sub national authorities depend on the use of informational lobbying strategies in order to influence the European Commission in the European Commission phase, and acknowledging that they need to influence the European Commission in order to prevent bad consequences (implementation problems, compliance problems, financial sanctions) from happening, the main research question of this thesis was:
How can the Dutch provinces improve their informational lobbying strategy in the European Commission phase of the European policy process?

In order to answer this question, the theory on informational lobbying was critically assessed, in order to come up with a set of necessary preconditions of an effective informational lobbying strategy, through which the informational lobbying strategy of the Dutch provinces was evaluated.

There were nine preconditions on the communicated information types, stating that nine different types of information should have been communicated to the European Commission. There were six types of technical information: experiential/feasibility information; legal information; technical data and information that makes technical data understandable; information about the social impact of a policy proposal; information about the economic impact of a policy proposal; and information about the environmental impact of a policy proposal. There were three types preference information: information about the Domestic Encompassing Interest; information about the European Encompassing Interest (voicing the needs and interests of respectively domestic and European associations); and information about the public opinion.

There were three preconditions that should be met regarding used ways of communication. First of all, insider strategies, i.e. strategies in which there is direct contact between interest groups and European institutions, should have been used as a means to communicate information to the European Commission (Beyers, 2004). Second of all, outsider strategies, i.e. strategies without direct contact between interest groups and European institutions, should have been used to communicate information to the European Commission (Beyers, 2004; Chalmers, 2013). Within outsider strategies, there are information politics and protest politics. Protest politics, i.e. strategies used by interest groups to deliberately cause conflict with the European institutions, should not be used (Beyers, 2004). This is the third precondition on ways of communication.

The use and presence of these ways of communication and information types, ergo the evaluation of the informational lobby of the Dutch provinces, is discussed in the next section.
7.2 Main findings
Concerning technical information, experiential/feasibility information, legal information and technical information and information that makes technical information understandable were communicated, meeting preconditions the first three preconditions. Information about the social, economic and environmental impact of proposed policy were not communicated at all, and the three other preconditions on information types were therefore not met. Consequently, in terms of evaluation, the provinces strictly seen would not get a perfect score, since not all the theoretical information types were communicated. However, since European Commission did not publish green or white papers in the review trajectory of the Thematic Strategy on Air Pollution, it is only logical that these last three types of technical information were not present in the documents. One cannot explain the effects of not-yet-existing policy. Consequently, the fact that the provinces did not meet the preconditions on the information types about the social, economic and environmental impacts, does not negatively affect the outcome of the evaluation.

Concerning preference information, information about the European Encompassing Interest, information about the Domestic Encompassing Interest and information on the public opinion was communicated, although the last mentioned information type was voiced extremely little. Still, all the preconditions concerning preference information were met. This leads to the conclusion that all the technical and preference information types that were possible to communicate were communicated, which is in terms of evaluation the wanted outcome. Furthermore, it is important to note that technical information types like experiential/feasibility information and the information types on the Encompassing Interests, typically overlap. When the provinces and their coalition partners proposed solutions for compliance problems, essentially being a type of experiential/feasibility information, they knowingly voiced preferential information at the same time. In general, information types tend to be blurred.

Concerning insider strategies, it can be stated that the provinces used all possible insider strategies, and meeting the related precondition for effective lobbying. It is worth noting that although insider strategies like position papers, the attending of expert meetings, making phone calls and sending emails were very useful, they were not necessarily used as ways to communicate information. They were mainly important as a means to keep up to date, and maintain the relationship with European Commissioners. Also, position papers were sent, but not in reaction to green or white papers, since these were not published in the review trajectory of the Thematic Strategy on Air Pollution. Finally, the Dutch provinces did not have a seat at
the table at the Stakeholder Expert Meetings, but they had multiple coalition partners, or contacts through their coalition partners, who had a place at the Stakeholder Expert Meetings.

Concerning outsider strategies, it can be stated that the Dutch provinces and their coalition partners used numerous outsider strategies, information politics to be specific, hereby meeting the related precondition The strategies of coalition building and organizing conferences were extremely important as a means to reach the European Commission, to create inside access and to acquire necessary information. Not all possible outsider strategies were used, though. Letters to editors were not written, for example, and the provinces did not participate in debates in the press. In the future these strategies could be put to use, to make the informational lobbying strategy of the Dutch provinces and their coalition partners more exhaustive. Also, the strategies of networking and ‘lobbying the non-EC institutions’ should be added this evaluative framework, since they were frequently used and regarded as important. Finally, protest politics were not used, for multiple reasons, hereby the last precondition

In conclusion, based on the conducted evaluative research, it can be said that the Dutch provinces did a fine job in lobbying the European Commission during period of 2011-2014 on the review of the Thematic Strategy of Air Quality, and that they should be happy with their informational lobbying strategy, it being at least in this singular case complete, convincing and in line with scientific findings on informational lobbying. Still, some recommendations should be made – this is done in the next section.

7.3 Practical recommendations

This evaluative research brought forth the following practical recommendations for the Dutch provinces to follow up upon in the future.

First of all, the Dutch provinces should invest more in gathering technical data and information that makes technical data understandable, as this research proved that the European Commission is very sensitive to information that brings new facts to the table – especially if the information is scientific and factual in nature. Currently, the Dutch provinces only communicate technical data, scientific studies, and research reports that they get from third parties, like national government institutions. The provinces should try to gather this information themselves, because if done right, scientific studies and research reports are the most effective ways possible of influencing the European Commission.
Second of all, the Dutch provinces should stop acquiring information on the public opinion on policy, as it is not a type of information that the European Commission needs from them. In fact, the European Commission has splendid ways of acquiring this information on its own, and one can presume that the information on the public opinion of the European Commission is likely to be as good as the information on the public opinion from the Dutch provinces - if not better.

Third of all the Dutch provinces should look into the possibilities of using ‘protest politics’ as a means of communicating their lobbying message. The provinces have thus far never used protest politics, and rightfully so, as literature suggested that protest politics would foremost endanger one’s reputation with European Commissioners and would easily do more harm than right when trying to exert influence in the European policy process. However, this research nuanced this view. European Commissioners do not necessarily condemn these type of strategies, as they are always willing to listen if one has an important message. In line with ‘using as much ways to communicate your lobbying as possible’, protest politics should be given a chance - albeit it in a very cautious manner.

Finally, the provinces should keep on organizing conferences, and keep on devoting the current amount of attention to the entering of coalition, as these strategies proved to be extremely useful in this evaluative research. It is safe to say that these strategies are the provinces’ strongpoints, and they should not stop using them.

7.4 Reflection
A reflection on the conducted research pointed out several things. First of all, it would in retrospect have been good to assess the informational lobbying strategies of multiple cases, in order to increase the validity, reliability and generalizability of this research. In this research a singular case was done, however, because of reasons of time, feasibility and a struggle to find the right research design. Needless to say, the research design would have been stronger, and the research more reliable, if more cases were studied.

Second of all, it is important to state that, although the informational lobbying strategy of the Dutch provinces was researched in order to improve it, this research was not based on numerous theory proving hard causality between information types, ways of communication and influence. In the case of information types, for example, a relatively small portion of theory (Bouwen, 2002, 2004; Klüver, 2013) stated the importance of technical and preference
information for the European Commission – despite the fact that a lot of literature explicated the importance of information in influencing the European institutions. Furthermore, only two texts really elaborated on the different types of technical information (Haverland & Liefferink, 2012; Chalmers, 2013). As a result, the available theory on information types rather provided grounded assumptions on the effect that the communication of information types may have, instead of unambiguous findings on the causality between information types and influence. As a result, this research had to be written with extra caution, and the outcome of this thesis’ evaluation cannot be handed to the provinces like a Popperian truth. This is a shame.

Second of all, as a result of the researcher being an inexperienced interviewer, and him underestimating the complexity of the theoretical concept for respondents to grasp on short notice, not all interviews rendered the expected results. In one interview, for example, the respondent did not quite get the difference between the different information types in the available half hour, and the questions on the information types eventually needed to be skipped. This negatively affected the validity and generalizability of the presented findings on information types in this research.

Third of all, again as a result of the researcher being an inexperienced interviewer, it was in a couple interviews underestimated how much can be discussed in a certain amount of time. To give an example, one European Commissioner only had 30 minutes to talk about air quality, and this turned out to be far too little time to discuss all prepared questions. In another interview, the researcher and the respondent got carried away with a topic that was not necessarily related to the central themes of the interview. As a result, these themes could not all be thoroughly elaborated upon in the end. However, it has also be stated that as a result of leaving the prepared line of questioning, several interesting findings have been made. Finally, from the mistakes made in conducting the interviews was learnt during the process, and the negative effects on validity, reliability and generalizability of the findings were limited.

7.5 Recommendations for further research
Based on the findings of this thesis, and based on the comparison between these findings and the underlying theoretical assumptions, the following recommendations can be made.

First of all, the theoretical concept that certain information types should be communicated to the European Commission, as posed in this thesis, should be critically assessed. According to theory, technical information and preference information are both
necessary for the European Commission to have. The two can be further divided in a total of 9 information types, which in turn can be taken to be necessary as well. However, this study suggests that legal information is not per se necessary to communicate to the European Commission. The necessity of legal information should therefore be researched, as well as the necessity of the other information types, in order to extend the validity of the evaluative framework that is used in this thesis.

Second of all, and in line with the former, the evaluative framework that is posed in this thesis should be applied and tested on more other cases, in order to increase its validity, to improve it or to dispose of it if need be. As of now, the evaluative framework posed in this thesis is the only one in the field of informational lobbying, and as briefly spoken on before, its theoretical foundation is relatively fragile. The framework however has potential, both as to offer ways for sub national authorities to improve their informational lobbying strategies, as to further develop theory on the subject.

Third of all, further research should be conducted on the possible ways that can be used to lobby the non-EC institutions in order to reach and influence the European Commission. These findings should be added to the evaluative framework that is posed in this thesis, and could help lobbying organizations across Europe to improve their informational lobbying strategies.

Fourth of all, the use of protest politics in trying to influence the European policy process should be researched. Theory is quite clear on the use of protest politics: because it can undermine the lobbying relationship of an interest group with the European Commission or other EU institutions, its use should be avoided (Beyers, 2004). The interviews conducted in this study raise doubts on this statement, however. First of all, the interviewed respondents from lobbying organizations shared the aforementioned negative view on protest politics, but they never actually tried to use them themselves. Second of all, whilst the respondents from the European Commission were not necessary in favor of the use of protest politics, they were also not strongly against it. Exemplary of this, is the following statement: ‘if interest groups would do those things [protest politics], they would not necessarily convince me that they are right’ (personal communication, European Commissioner B). As the quote shows, the European Commissioner held a quite ambiguous stance on the use of protest politics, and at least did not condemn it. Lastly, it needs to be said that there are lobby groups out there that actually find
protest politics successful (the farmers for example). These three arguments lead to the suggestion that the use of protest politics should be researched in the future.

Finally, the theoretical concept of resource dependency should be evaluated. Theory on informational lobbying states that there is a resource dependency between the European Commission and third parties, in which the European Commission is dependent on third parties like interest groups in order to gather information and make policy (Bouwen, 2002, 2004; Klüver 2012). However, the respondents in this study suggested that this view of the lobbying relationship is exaggerated (personal communication, European Commissioner A; B; C; D; personal communication, lobbyist C). It would be useful to research this lobbying relationship in the future, in order to find out in what ways the European Commission fundamentally acquires and deals with information, and to what extent the European Commission actually needs information from interest groups in order to develop policy. As a result of this study, lobby groups and interest groups across Europe could alter their informational lobbying strategies for the better and arguably lobby more effectively and efficient.
Literature


Boeije, H. (2010). *Analysis in qualitative research*. 

89


EUROCITIES (2011a). *EU air quality policy review: timeline.* Retrieved from


EUROCITIES (2013a). *Cleaner air in our cities. EUROCITIES answer to the Commission questionnaire on the consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies.* Retrieved from http://nws.eurocities.eu/MediaShell/media/20130103%20FINAL%20EUROCITIES%20response%202nd%20AQ%20consultation.pdf

91


Grant, W (2000). *Insider groups and interest group strategies in Britain.*


Harvey, W.S. (2011). *Strategies for conducting elite interviews.*


Interprovinciaal Overleg. *Oplegnota EU consultatie Thematische Strategie Luchtkwaliteit.* (n.d.) [internal document].
Interprovinciaal Overleg. Consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies (n.d.) [internal document]


Interprovinciaal Overleg (2013). ‘EC-consultatie Thematische Strategie Luchtkwaliteit’ [Internal document].

Interprovinciaal Overleg (2014). ‘IPO Prioritaire Agenda’ [internal document].


Regio Randstad. Consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies (n.d.) [internal document].


Regio Randstad (2012). Randstad pleit voor sterker Europees bronbeleid [press release].


Utrecht, Consultation on EU air quality legislation ~ Questionnaire 2 for experts and practitioners (n.d.) [internal document].


Voerman, J. (2012b). *THREE MEETINGS ON AIR POLLUTION IN BRUSSELS* [internal document].


Zuid Holland (2011). *Consultation on EU air quality legislation ~ Questionnaire 2 for experts and practitioners* (n.d.) [internal document].

Appendices

Appendice I: list of respondents

Beate Arends

Air quality policy expert for Dutch province South-Holland (Zuid-Holland) & House of the Dutch Provinces (HNP)

Matteo Brumati

Lobbyist Regione Piemonte & AIR Initiative of the Regions

Joana Cruz

Lobbyist EUROCITIES and former assistant MEP

Ariane Decramer

Lobbyist Flemish lobbying organization VLEVA & AIR Initiative of the Regions

Rob van Eijkeren

Lobbyist House of the Dutch Provinces (HNP)

Simone Goedings

Lobbyist Association of Dutch Municipalities (VNG)
Thomas Henrichs
Policy officer of the European Commission

Matjaz Malgaj
Policy officer of the European Commission

Elena Visnár Malinóvska
Policy officer of the European Commission

Marjon Plantinga
Air quality policy expert for Dutch province Utrecht & House of the Dutch Provinces (HNP)

Sidony Venema
Lobbyist House of the Dutch Provinces (HNP) & AIR Initiative of the Regions

Thomas Verheye
Policy officer of the European Commission
Appendice II: operationalized theory

<table>
<thead>
<tr>
<th>Code</th>
<th>Definition</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| **Technical information** | All the information that describes how policies actually work at the street and/or company level, states how implementation problems can be solved effectively, and in line with this tells something about the feasibility of a policy proposal as a whole (Chalmers, 2013; Haverland & Liefferink, 2012). | - information on (reasons for) practical implementation problems  
- solutions for practical implementation problems  
- information on (reasons for) compliance problems  
- solutions for compliance problems  
- information that points out how EU policy is ineffective  
- information posing possible ways to make EU policy more effective  
- information on the ways how regions carry out EU policy  
- information on the best practices of regions in carrying out EU policy                                                                 |
| 1A. Experiential/feasibility information  |                                                                                                                                                                                                       |                                                                                                                                                                                                       |
| 1B. Legal information  | information that is needed in order to write the necessary rules and legislation of a policy proposal (Chalmers, 2013)                                                                                     | - legal language  
- draft proposals or other written regulation, pre-written legal articles  
- suggestions on how the European Commission                                                                                                                                                                        |
| 1C. Technical data and information that makes technical data understandable | Very technical information like scientific findings, research analyses, figures and numerical data, and information that makes this information understandable and interpretable for the European Commission (Chalmers, 2013). | could alter existing policy and in turn improve it
-information on how EU policy complies or does not comply with existing domestic/EU/international regulation
-technical data
-numerical data
-measurements of air quality
-information explaining the findings of scientific reports, or references to scientific reports
-information explaining the findings of published research analyses, or references to published research analyses
-graphs, tables |
| 1D. Information about the economic impact of proposed policy | Information that states how a proposed policy will affect the (national, regional and/or local) economies of Member States (Chalmers, 2013), i.e. how a proposed policy will affect the commerce, employment or incomes in a Member State | - calculated information about the effects of the proposed EU policy on regional and/or local commerce, in case of implementation of the policy  
- calculated information about the effects of the proposed EU policy on regional and/or local employment, in case of implementation of the policy  
- calculated information about the effects of the proposed EU policy on regional and/or local incomes, in case of implementation of the policy  
- calculated facts and (non-) numerical data about the economy, should the proposed EU policy become official legislation  
- predictions on the effects of proposed EU policy |
| 1E. Information about the social impact of proposed policy | Information about the social impact of policy, i.e. information that states how policy will affect the social fabric of  
information about the social impact of policy, i.e. information that states how policy will affect the social fabric of | - calculated information about the effects of proposed EU policy on the social fabric of |
<p>| fabric of the community and the well-being of the individuals and families of a Member State’s society (Chalmers, 2013; <a href="http://www.businessdictionary.com">www.businessdictionary.com</a>). | local/urban/regional communities in Europe, in case of implementation of the policy -information about the effects of proposed EU policy on families living in municipalities, cities and regions, in case of implementation of the policy -information about the effects of EU policy on individuals in the society of European municipalities, cities and regions, in case of implementation of the policy - calculated facts and (non-) numerical data, should the proposed EU policy become official legislation -predictions on the effects of proposed EU policy | 1F. Information about the environmental impact of proposed policy | information that regards the consequences that the proposed policy would have on the environment, if the | -calculated information about the effects on the environment, in case of |</p>
<table>
<thead>
<tr>
<th>Preference information</th>
<th>2A. Information about the European Encompassing Interest</th>
<th>The information required from the private and public sector on the European Encompassing Interest (EEI), regarding the aggregated needs and interests of a sector in the EU internal market. (Bouwen, 2002; 2004)</th>
<th>implementation of the policy -calculated facts and (non-)numerical data about the environment, should the proposed EU policy become official legislation -predictions on the effect of proposed EU policy</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2B. Information about the Domestic Encompassing Interest</td>
<td>The information required from the public and private sector on the Domestic Encompassing Interest (DEI), regarding the aggregated needs and interests of a sector in the domestic market. (Bouwen, 2002; 2004)</td>
<td>-the members of a Dutch association of regions, the members of a Dutch coalition of regions, the co-signs of a lobbying message -information about the interests of Dutch regions regarding Air Quality policy, information about</td>
</tr>
</tbody>
</table>
the needs and interests of Dutch regions regarding Air Quality policy.

<table>
<thead>
<tr>
<th>Code</th>
<th>Definition</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| Insider strategies | communication strategies in which policy makers are contacted directly, through formal or informal networks, by using access to these policy makers (Boscheid & Coen, 2003; Beyers, 2004; Binderkrantz, 2005) | -position papers  
- reactions to green papers  
- reactions to white papers  
- completed questionnaires from internet consultations  
- completed questionnaires from impact assessments  
- proof of attended meetings (e-mails, summaries, feedback, presentations, verbal statement of interviewee)  
- proof of involvement in expert group (e-mails, |
<table>
<thead>
<tr>
<th>Outsider strategies</th>
<th>4A. Information politics</th>
<th>the public presentation of information, with the purpose of signaling information to key policy-makers, without direct contact with them.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>-published press releases (online, in magazines, newspapers or other media)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>-written letters or e-mails to editors of papers or magazines</td>
</tr>
</tbody>
</table>
- proof of participation in debates in the press (in the form of news coverage, or an official statement of an interviewee)
- published reports, published analyses, published folders and brochures
- disseminated views on websites of the regions or region-affiliated parties
- proof of arranged public meetings and public conferences group (e-mails, summaries, feedback, presentations, verbal statement of interviewee)
- co-signs of letters or other signs of coalitions or associations.
4B. Protest politics

<table>
<thead>
<tr>
<th></th>
<th>events that are <em>explicitly</em> staged and meant to attract attention and expand conflict regarding a policy issue (Beyers, 2004, p. 214).</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- organized manifestations and demonstrations</td>
</tr>
<tr>
<td></td>
<td>- staged street actions</td>
</tr>
<tr>
<td></td>
<td>- organized strikes</td>
</tr>
<tr>
<td></td>
<td>- calls for civil disobedience</td>
</tr>
<tr>
<td></td>
<td>- organized letter writing campaigns</td>
</tr>
<tr>
<td></td>
<td>- organized petitions</td>
</tr>
</tbody>
</table>

**Table 5. Operationalized ways of communication**
## Appendix III: findings from analysis

<table>
<thead>
<tr>
<th>Precondition</th>
<th>Met/not met</th>
<th>If not met: valid reasons?</th>
<th>Implications or recommendations?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Precondition 1.</strong> To be effective in informational lobbying, interest groups must communicate technical information to the European Commission</td>
<td>Not met.</td>
<td>Yes, valid reasons. Because of an absence of published green or white papers, the Dutch provinces could not react to those, and preconditions 1.4, 1.5 and 1.6 could not be met. This was outside of the control of the Dutch provinces, though.</td>
<td>No. The provinces did a good job communicating this information type.</td>
</tr>
<tr>
<td><strong>Precondition 1.1</strong> To be effective in informational lobbying, interest groups must communicate experiential/feasibility information to the European Commission</td>
<td>Met</td>
<td>-</td>
<td>No. The provinces did a good job communicating this information type.</td>
</tr>
<tr>
<td><strong>Precondition 1.2</strong> To be effective in informational lobbying, interest groups must communicate legal information to the European Commission</td>
<td>Met</td>
<td>-</td>
<td>No. The provinces did a good job communicating this information type.</td>
</tr>
<tr>
<td><strong>Precondition 1.3</strong> To be effective in informational lobbying, interest groups must communicate technical data and information that makes technical data understandable to the European Commission</td>
<td>Met</td>
<td>-</td>
<td>No. The provinces did a good job communicating this information type.</td>
</tr>
<tr>
<td><strong>Precondition 1.4</strong> To be effective in informational lobbying, interest groups must communicate information about the economic impact of a policy to the European Commission</td>
<td>Not met</td>
<td>No published green and/or white papers</td>
<td>No. Communicating this information type was not at all an option, so it would be unfair to make recommendations</td>
</tr>
<tr>
<td><strong>Precondition 1.5</strong> To be effective in informational lobbying, interest groups must communicate information about the social impact of a policy to the European Commission</td>
<td>Not met</td>
<td>No published green and/or white papers</td>
<td>No. Communicating this information type was not at all an option, so it would be unfair to make recommendations</td>
</tr>
<tr>
<td><strong>Precondition 1.6</strong> To be effective in informational lobbying, interest</td>
<td>Not met</td>
<td>No published green and/or white papers</td>
<td>No. Communicating this information</td>
</tr>
</tbody>
</table>
groups must communicate information about the environmental impact of a policy to the European Commission

<table>
<thead>
<tr>
<th>Precondition 2.</th>
<th>To be effective in informational lobbying, interest groups must communicate Preference information to the European Commission.</th>
<th>Met.</th>
<th>-</th>
<th>No. The provinces did a good job communicating this information type.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Precondition 2.1</td>
<td>To be effective in informational lobbying, interest groups must communicate information about the European Encompassing Interest to the European Commission.</td>
<td>Met.</td>
<td>-</td>
<td>No. The provinces did a good job communicating this information type.</td>
</tr>
<tr>
<td>Precondition 2.2</td>
<td>To be effective in informational lobbying, interest groups must communicate</td>
<td>Met.</td>
<td>-</td>
<td>No. The provinces did a good job communicating this information type.</td>
</tr>
</tbody>
</table>
information about the Domestic Encompassing Interest to the European Commission.

<table>
<thead>
<tr>
<th><strong>Precondition 2.3</strong></th>
<th>To be effective in informational lobbying, interest groups must communicate information on the public opinion to the European Commission.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met, although information on the public opinion was communicated extremely little</td>
<td>Legal information was hardly communicated, because the European Commission has good ways of acquiring this information through their own organizations. Also, the European policy process and air quality policy are too complicated for the general public and because of the technical nature of air quality policy, the European Commission mainly needed technical information. Also: how does one measure the public opinion?</td>
</tr>
<tr>
<td>Yes, a theoretical implication. It should be assessed if legal information actually is that important in order to communicate to the European Commission, or that it is an unnecessary evaluative precondition.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Precondition 3.</strong></th>
<th>To be effective in informational lobbying, interest groups must use all possible insider strategies as a means to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not met.</td>
<td>No reactions to green and/or white papers were published, but there were no white papers. Also, the provinces themselves did not manage to get a seat</td>
</tr>
<tr>
<td>No. The provinces did a good job using insider strategies.</td>
<td></td>
</tr>
<tr>
<td><strong>Precondition 4.</strong> To be effective in informational lobbying, interest groups must use all information politics as a means to communicate information to the European Commission</td>
<td>Not met.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Precondition 5.</strong> To be effective in informational lobbying, interest groups must not use protest politics as a means to communicate information to the European Commission</td>
<td>Met.</td>
</tr>
</tbody>
</table>
Appendix IV: semi-structured interview sheet (lobbyist)

*Introduction*

Hello, I am Joep Sistermanns, and I conduct research for Radboud University. My research revolves around the informational lobbying strategy of the Dutch provinces, and decentral governments in general.

An informational lobbying strategy in my research is defined as a combination of communicated information types and ways of communication.

The aim of my research is to find out which information types are communicated by the provinces to the European Commission, and which ways of communication are used, and which information types should be communicated to the European Commission, and which ways of communication should be used. I want to know if there is a causal relationship between information and ways of communication on the one hand, and influence on European Commission policy makers on the other.

I wanted to speak to you in order to find out the causality between information, ways of communication and influence. I am convinced that your perspective, as the lobbying party in the lobbying relationship, is very interesting and useful.

Besides you, I also interview several persons that are or have been active in the Dutch provinces, and persons that have been active in other decentral lobbying groups, and I try to interview as much relevant officers of the European Commission, like yourself.

Before we start the interview, I want to ask you if it is OK if I record this interview, in order to enhance the validity of my research. The information that you provide will only be used for research purposes only. If you want, I will send you the transcript of this interview later on.

Let’s start.

*Questions*

1. *Introduce yourself. What’s your name, for which organization do you work, and how long have you been working there?*
2. *How and during which period were you affiliated with the lobby of the Dutch provinces regarding the review of the Thematic Strategy on Air Quality?*
3. *Can you briefly explain what the provinces (and/or your organization) lobbied for regarding the Thematic Strategy on Air Quality?*
4. *Can you explain with which parties the Dutch provinces (and/or your organization) have cooperated in their lobby?*
5. *Which cooperations/coalitions do you reckon the most useful, in retrospect? Why?*
6. *Which cooperations/coalitions were the least useful? Why?*
7. *What can you say about the importance of (lobbying in) coalitions?*
8. In this interview the focus is on two things. The ways in which information is communicated to the European Commission, and the types of information that are communicated. Let’s first talk about the ways in which information was communicated. Can you tell me what your organization(s) did in order to reach the European Commission? Which ways have you used to exert influence? Please use the scheme in your interview sheet.

9. You did not use the following strategies. Why not?

10. If you look back on the ways of communication that you just described, which strategies would you state as being the most effective in reaching the Commission? Insider strategies? Outsider strategies? Both?

11. Are there ways of communication that do not work? Why not?

12. Is there something as lobbying too much?

13. Would you say that it is useful for decentral governments to lobby the European Commission, looking back at the review trajectory of the new Thematic Strategy on Air Quality?

14. Is it useful for interest groups to lobby in a review phase? How is lobbying in a review phase different from a lobby that is on entirely new policy?

15. Let’s talk about the information types. When you look at the lobby you that you were a part of. Which information types did you use to communicate to the European Commission? Please answer the question with help of my interview sheet.

16. Which information type(s) would you say the European Commission needs?

17. Which information types did you think of as important to communicate to the European Commission?

18. You didn’t use the following information types. Why not?

19. According to some scientists, it is important to communicate all kinds of information. The argument is that the European Commission needs all types of information in practice, also with an eye on the future stages in the policy cycle, for example in the EP-phase of the Council-phase. What is your take on this?

20. What is more important? The lobbying message, or the strategy to communicate the lobbying message?

Thank you for this interview. I will transcribe the interview and e-mail the transcription to you within next week. If I still have questions later on, can I e-mail them then? And finally, would you like to get the results of my research?

Have a nice day.
Appendice V: semi-structured interview sheet (European Commissioner)

Introduction

Hello, I am Joep Sistermanns, and I conduct research for Radboud University. My research revolves around the informational lobbying strategy of the Dutch provinces, and decentral governments in general.

An informational lobbying strategy in my research is defined as a combination of communicated information types and ways of communication.

The aim of my research is to find out which information types are communicated by the provinces to the European Commission, and which ways of communication are used, and which information types should be communicated to the European Commission, and which ways of communication should be used. I want to know if there is a causal relationship between information and ways of communication on the one hand, and influence on European Commission policy makers on the other.

I wanted to speak to you in order to find out the causality between information, ways of communication and influence. I am convinced that your perspective, as the receiving party in the lobbying relationship, is very interesting and useful.

Besides you, I also interview several persons that are or have been active in the Dutch provinces, and persons that have been active in other decentral lobbying groups, and I try to interview as much relevant officers of the European Commission, like yourself.

Before we start the interview, I want to ask you if it is OK if I record this interview, in order to enhance the validity of my research. The information that you provide will only be used for research purposes only. If you want, I will send you the transcript of this interview later on.

Let’s start.

Questions

1. What is your name and position?
2. How and during which period in time have you been or were you affiliated with the Review of the Thematic Strategy on Air Quality?
3. As a [position], what were your tasks regarding the review of the Thematic Strategy on Air Quality?
4. Have you, or the EC as a whole, been lobbied by interest groups or lobby groups?
5. Have you, or the EC as a whole, been lobbied by interest groups or lobby groups of decentral governments?
6. Can you give examples of the lobbying messages that were communicated to you, or the EC as a whole, in order to convince you?
7. Can you give examples of the ways in which the messages were communicated to you? (Roughly we distinguish between insider strategies, which require direct contact between you and the lobbyist, and outsider strategies in which the lobbying message is communicated through for example the media, in an indirect manner)

8. Which ways of communication (or lobbying) do you regard as effective in reaching you? Do you think direct contact works best, or do you think that indirect contact through for example the media works best? Or both?

9. Are there lobbying tactics that do not work?

10. Is there something as ‘lobbying too much’?

11. Which members of the European Commission are the most useful to lobby in your opinion?

12. And which ways of communication or lobbying would you yourself use if you were an interest group?

13. According to literature, it is a given that the European Commission is dependent on third parties like lobby groups in order to make policy, because the European Commission itself does not have the time or manpower gather all the necessary information. Can you confirm this?

14. Have you, or has the EC in general, made use of interest groups or lobby groups while developing the new Thematic Strategy on Air Quality?

15. Which types of information did you, or the European Commission as a whole, need in order to develop the new Thematic Strategy on Air Quality? (Types of information are expert information or information that display the policy preferences of companies and/or central/decentral governments)

16. Within expert information there are the following information types: ............ Which types of information did you need?

17. Within preference information there are the following information types: ................. Which types of information did you need in order to develop the Thematic Strategy on Air Quality?

18. What types of information are the most important to communicate according to you?

19. There are theories that state that the European Commission is not only sensitive to expert information, but that they are interested in the public opinion and preferences/interests of national and international companies, governments and interest groups as well, regardless of the phase in the policy cycle. What do you think of this statement?

20. Do you think that it is useful for interest groups to lobby in a review phase? Or it too much of the new strategy given already?

Thank you for this interview. I will transcribe the interview and e-mail the transcription to you within next week. If I still have questions later on, can I e-mail them then? And finally, would you like to get the results of my research?

Have a nice day.
Appendix VI: document for interviewees

In this research, a difference is made between technical and preference information.

Technical information, firstly, is defined as highly technical, scientific, objective and data-driven information, needed in order to understand the market and develop sound and effective political and legal initiatives.

Preference information, secondly, is defined as information about public and private support as well as normative/value-laden claims, needed to identify the range of possible and acceptable political initiatives and solutions within the EU.

Both technical and preference information can be further categorized.

Technical information:

1. Experiential/feasibility information is all the information that describes how policies actually work at the street and/or company/government level, states implementation problems and how they can be solved effectively, and in line with this, tells something about the feasibility of a policy proposal as a whole.

2. Legal information, which defines as information that is needed in order to write the necessary rules and legislation of a policy proposal. Legal information often concerns information written in legal language, like draft proposals or other additions to existing regulation (Chalmers, 2013). In this thesis, it is assumed that it can also point out errors in drafted law proposals, or explain how a new policy relates to existing laws in a Member State and consequently provide specific points of consideration.

3. The third type of information is technical data and information that makes technical data understandable, for example in the form of scientific research or published analysis.

4. Fourthly, information about the economic impact of policy explains how a proposed policy will affect the (national, regional and/or local) economies of Member States, i.e. how a proposed policy will affect the commerce, employment or incomes in a Member State.

5. The fifth type of information, information about the social impact of policy, states how policy will affect the social fabric of the community and the well-being of the individuals and families of a Member State’s society.

6. The sixth information type is information about the environmental impact of policy. It regards the consequences that the proposed policy would have on the environment, if the policy would become official legislation.
Preference information:

1. **Information about the European Encompassing Interest.** This information type is defined as: ‘The information required from the public/private sector on the European Encompassing Interest (EEI). (...) The EEI relates to the aggregated needs and interests of a sector in the EU internal market. This includes, for example, the information provided by the European Banking Federation on the interests of its members with regard to the capital adequacy rules for commercial banks.’ (Bouwen, 2004, p. 340)

2. **Information on the Domestic Encompassing Interest** is defined as the information required from the private/public sector on the Domestic Encompassing Interest (Bouwen, 2004). This information relates to the aggregated needs and interests of a *private* or public sector in the *domestic market*. An example is the information provided by the Belgian Bankers Association, on the interests of its members with regard to the capital adequacy rules for commercial banks (Bouwen, 2004).

3. **Information about the public opinion on policy.** It can be defined as the way the general public, i.e. the citizens of the EU, think about a policy proposal. This is the third type of preference information. It generates input legitimacy.

Communication strategies:

**Communication strategies** are ways to communicate information to the European institutions, and hereby exercise influence.

1. **Insider strategies:** communication strategies in which policy makers are contacted directly, through formal or informal networks, by using access to these policy makers (Boscheid & Coen, 2003; Beyers, 2004; Binderkrantz, 2005).

2. **Outsider strategies:** strategies used by ‘outsiders’, i.e. lobbying parties that do not have the access to get in touch with the policy makers directly, and henceforth need other ways to get their attention (Chalmers, 2013).

   2.1 **Informational politics:** the public presentation of information, with the purpose of signaling information to key policy-makers, without direct contact with them.

   2.2 **Protest politics:** events that are *explicitly* staged and meant to attract attention and expand conflict regarding a policy issue (Beyers, 2004, p. 214).
**Technical information**

- Experiential/feasibility information
- Legal information
- Technical data and information that makes technical data understandable
- Information about economic impact
- Information about social impact
- Information about environmental impact

**Preference information**

- Information about the European Encompassing Interest
- Information about the Domestic Encompassing Interest
- Information about the public opinion on policy

<table>
<thead>
<tr>
<th>Insider strategies</th>
<th>Outsider strategies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Information politics</strong></td>
<td></td>
</tr>
<tr>
<td>Write position papers:</td>
<td>Issue press releases</td>
</tr>
<tr>
<td>a) in reaction to a green paper</td>
<td>Write letters to editors</td>
</tr>
<tr>
<td>b) in reaction to a white paper</td>
<td>Participate in debates in the press</td>
</tr>
<tr>
<td>Take part in internet consultations</td>
<td>Organize press conferences</td>
</tr>
<tr>
<td>Take part in impact assessments</td>
<td>Publicize analyses and research reports</td>
</tr>
<tr>
<td>Respond to requests for comments in other ways</td>
<td>Disseminate views by publishing folders and brochures</td>
</tr>
<tr>
<td>Attend meetings</td>
<td>Disseminate views on website</td>
</tr>
<tr>
<td>Take part in expert groups</td>
<td>Arrange public meetings and public conferences</td>
</tr>
<tr>
<td>Make phone calls</td>
<td>Mobilize other associations</td>
</tr>
<tr>
<td>a) to members of the EC</td>
<td>Enter in coalitions</td>
</tr>
<tr>
<td>b) to members of expert groups</td>
<td>Protest politics</td>
</tr>
<tr>
<td>Write letters</td>
<td>Organize manifestations &amp; demonstrations</td>
</tr>
<tr>
<td>a) to members of the EC</td>
<td>Stage street action</td>
</tr>
<tr>
<td>b) to members of expert groups</td>
<td>Organize strikes</td>
</tr>
<tr>
<td>Send e-mails</td>
<td>Call for civil disobedience</td>
</tr>
<tr>
<td>a) to members of the EC</td>
<td>Organize letter writing campaigns</td>
</tr>
<tr>
<td>b) to members of expert groups</td>
<td>Organize petitions</td>
</tr>
</tbody>
</table>

- Face-to-face communication
  - a) with members of the EC
  - b) with members of expert groups