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Master's Thesis

**Lobby Strategies of Interest Groups in the
European Union**

유럽연합 내 이익집단들의 로비전략

July 2017

Graduate School of Seoul National University

International Commerce Major, GSIS

Camille Smeyers

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Abstract

Lobby Strategies of Interest Groups in the European Union

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The aim of this thesis is to develop an understanding of how interest groups influence policy-makers, specifically in the European Union. The research is based on a theoretical framework of demand and supply for access goods and on the concepts of access strategy, voice strategy and frame strategy. Interest groups can use these different channels to gain access to EU decision-makers or to influence them indirectly through the general public. In order to investigate the research question, a qualitative methodological approach is carried out by performing a case study on the interest groups involved with the debate on genetically modified organisms in the European Union, based on data obtained from interviews and document analysis. The case study shows that both business and civil society interest groups are primarily using access strategies, due to the European Commission opting for a more diversified supply of access. Furthermore, framing plays a key role in the lobby process; it can make or break an interest group's overall lobby strategy.

Keywords: Lobbying; Access strategies; Voice strategies; Framing; European Union; Genetically Modified Organisms

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국문 초록

본 논문은 이해 집단이 정책 입안자, 특히 유럽연합에 어떤 영향을 미치는지에 대한 이해를 목적으로 한다. 이 연구는 접근 상품에 대한 수요와 공급의 이론적 틀과 접근 전략, 음성 전략 및 프레임 전략의 개념에 기반하고 있다. 본 논문에서 연구되는 이해 집단은 유럽연합의 의사 결정자에게 접근하거나 일반 대중을 통해 간접적으로 영향을 미치기 위해 이러한 다양한 전략을 활용한다. 또한, 연구 문제 조사를 위해 유럽연합의 유전자 변형 생물체에 관한 논쟁과 관련된 이해 집단의 사례 연구를 수행하고, 인터뷰와 문헌 분석에서 얻은 데이터를 기반으로 질적 분석을 진행한다. 결과적으로, 비즈니스 및 시민 사회의 이해 집단 모두가 접근 전략을 사용하고 있음이 증명되었으며, 이는 유럽연합 집행위원회가 다원화된 접근을 허락하였기 때문이다. 또한 프레임 전략은 로비 과정에서 중요한 역할을 한 것으로 나타났으며, 이익 단체의 전반적인 로비 전략을 생성하거나 왜해시키기도 한다.

주요 핵심 용어: 로비활동, 접근 전략, 음성 전략, 프레임 전략, 유럽연합, 유전자변형생물체

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Abbreviations & Explanations

COREPER	Committee of Permanent Representatives
DG	Directorate-General
EFSA	European Food Safety Authority
EU	European Union
GM	Genetically Modified
GMO	Genetically Modified Organism
MEP	Member of European Parliament
NGO	Non-Governmental Organization
PAC	Political Action Committee
SME	Small and Medium-sized Enterprises

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Introduction

Lobbying aimed at EU decision-makers has been long established and nowadays it is a billion-euro industry in Brussels, the de facto capital of the EU. This thesis will focus on the different lobby strategies of interest groups and will illustrate how interest groups can use multiple strategies and access points to influence EU policy-making. The thesis will be based on Bouwen's (2002; 2004) theory of demand and supply of access goods and Beyer's (2004) concepts of access and voice strategies. Access goods are the resources that are being exchanged between the interest groups and the public officials. In return for access to EU institutions, interest groups will have to supply access goods, i.e. crucial information that is being demanded by the EU institutions. There are different channels through which interest groups can provide access goods and influence policy-makers, namely through access or voice strategies (Bouwen, 2002; Beyers, 2004). While voice (i.e. outside lobbying) refers to public political strategies, access (i.e. inside lobbying) aims at the venues where political bargaining takes place.

Additionally, the concept of framing will be used in this thesis since it plays a key role in public policy-making. Interest groups are able to strategically emphasize certain aspects of a policy proposal while simultaneously neglecting others in order to push the debate in the direction they prefer (Baumgartner and Mahoney, 2008). This lobby strategy is known as framing, and while highly important, we do not know a lot about how interest groups choose and use their frames. The use of frame strategy, in

combination with access and voice strategies, will be further discussed in this thesis by analyzing the case of GMOs in the EU.

Lobbying is an important and socially relevant research topic. While not all issues that are being lobbied by interest groups have a direct impact on society, most issues have distributive dimensions, which means that some interest groups win while others lose. Due to the problems of collective action and free riders, concentrated specific interests will be overrepresented and broad diffuse interests undermined (Olson, 1965). Moreover, governments constantly claim to act in the best interest of the general public, but they are regularly influenced by lobby groups to act differently. Thus, it is important for the general public to have some general understanding of lobbying and lobby strategies so they can mobilize and urge their politicians to do the best thing for the wellbeing of their society.

This thesis will attempt to answer the following principal research question: “How do interest groups influence policy-makers?”. The purpose of this research is to improve the understanding of what types of lobby strategies interest groups use to influence policy-makers. To examine this research question, a case study will be performed on the lobby strategies of the interest groups involved with the debate on GMOs in the EU. The thesis is organized as follows: the following chapter provides a conceptual framework for understanding lobbying and discusses the lobby strategies that interest groups can use. The framework seeks to increase our understanding of how interests

can influence the creation of EU legislation in a specific policy area or sector. Furthermore, the last part of the chapter will go into more detail on lobbying in the EU. Chapter two will set out the methodological approach used for the case study. Lastly, chapter three will present a case study on the GMO debate in the EU, with a focus on the GMO cultivation Directive.

1. Literature review

The first part of the literature review will discuss the concept of lobbying. It is divided into three sections: (1) definition of interest groups and lobbying, (2) arguments why interest groups lobby, and (3) strategies to influence policy-makers. The second part of the literature review will assess lobbying in the European Union, with a focus on the European Commission, the European Parliament, and the Council of the EU.

1.1 Lobbying

1.1.1 Definition of interest groups and lobbying

Interest groups, also known as lobby groups or pressure groups, try to influence the political process as a way of protecting their members' interests (Grossman & Helpman, 2002). Baron (2010) argues that issues with either distributive or moral consequences can motivate interest groups to pursue action. Most issues have distributive dimensions, which means that some interest groups win while others lose. Interest groups can pursue a variety of strategies and their activities include, but are not limited to, lobbying politicians, informing the public and policymakers about issues, and contributing to campaigns. There are a wide variety of types of interest groups and they differ in size, influence and motive. According to Baumgartner (2007), most scholars adopt definitions of interest groups that are too narrow, particularly when it

comes to the type of interest group. Various actors that pursue certain policy measures are also policy-makers at the same time, for example the Council of the EU, one of two chambers of the EU's legislative branch, is composed of national ministers that represent their national interests.

Interest groups can take the form of individual firms, trade associations, NGOs, and public interest groups (Beyers & Kerremans, 2007). For example, an NGO could be an environmental group while a public interest group could be a local government or national ministry. For SMEs, it is particularly interesting to them that they join a trade association in order to successfully influence policy-makers. By being a member of a trade association, they are able to pool resources and to assure "strength in numbers". However, there are also negative aspects associated with being part of a large association. These associations are limited in their actions because their members can have different priorities and views on certain issues (Drutman, 2015). This kind of problem whereby collective lobbying is restricted to issues where a general consensus can be achieved is known as the "least common denominator" problem.

Lobbying can be defined in many ways and can thus not be limited to one official definition. In this thesis, lobbying is defined as the strategic provision of information by interest groups to public officials, with the goal of influencing outcomes in institutional arenas (Baron, 2010). Since there are various stages of decision—making,

lobby strategies will need to be shifted to the appropriate public officials and institutions involved in the targeted decision-making stage.

Crombez (2002) argues that there are two types of lobbying, informative and influential. Informative lobbying occurs when there is a change in the beliefs of a public official on the consequences of a change in the status quo. Influential lobbying, on the other hand, can be observed when the final policy outcome is different from the one that would have occurred without the lobbying of interest groups.

1.1.2 Why do interest groups lobby?

While the title of this section sounds like an obvious question, research shows that answering this question is surprisingly difficult (Lowery, 2007). The majority of studies that were published over the last several decades assume that the prime purpose of interest groups is to influence public policy. There have been two broad revolutions in the literature on the politics of interest representation over the post-War era: (1) transactions perspective and (2) neopluralist perspective. The first revolution, transactions perspective, is a reaction to the pluralist theory of Dahl (1961) and Truman (1951), which argues that like-minded individuals naturally gather when there are disturbances in the policy environment. Pluralism, together with corporatism, can be seen as the traditional model to understand interest groups representation in democratic systems (Hix & Hoyland, 2011). According to this essentially instrumental

view, lobbying is seen as a support of, rather than a threat to, democratic governments due to the constraints put on lobbying. Furthermore, the population of interest groups reflects the distribution of interests in society well. Thus, while interest groups do have different levels of resources available to them, the majority still has access to some means of influencing (Hix & Hoyland, 2011). Lobby strategies mainly consist of providing information to public officials and were thus seen as goodhearted. Overall, according to the pluralist view, interest groups and their actions were seen as supportive to democratic governments and policy outcomes reflected the public's opinion (Lowery, 2007).

The first revolution, transactions perspective, completely rejected this view and argues that organized interests do not form naturally (Stigler, 1971; Peltzman, 1976; Mitchell & Munger, 1991). Instead, certain incentives are provided in order to mobilize interests. Due to the collective action problem and differences in access to resources through which these incentives are given, the population of interest groups often poorly reflects the distribution of interests in society (Olson, 1965; Lowery, 2007). The transactions perspective argues that public policy is captured by interest groups, particularly small interest groups with sufficient resources, and views lobbying as a threat to democratic governments. This perspective is also known as the profit maximizing model, in which strong interest groups lobby at the cost of the weak in order to protect their interests. It has to be noted that empirical evidence for this theory has been mixed and that no clear

link between political participation of business interests and policy benefits has been proven (Hansen, Mitchell & Drope, 2005).

While the second revolution, neopluralist perspective, does challenge the transactions perspective, it did not go back to the pluralist way of thinking (Lowery & Gray, 2004). Most neopluralist studies highlight the uncertainty and ineffectiveness that lobbying brings along. For example, Heinz, Laumann, Nelson, and Salisbury (1993) argue that the lobbying environment is characterized by high uncertainty in goals and means. Another scholar, Kollman (1998), underlines the importance of public opinion when lobbying, namely that direct lobbying in the context of opposing public opinion will have little effect on public officials. While the studies of neopluralist scholars can differ in their findings, they do share “...*the unavoidable conclusion that PACs and direct lobbying sometimes strongly influence Congressional voting, sometimes have marginal influence, and sometimes fail to exert influence*” (Baumgartner & Leech, 1998). Overall, the neopluralist perspective wonders why interest groups lobby as the level of uncertainty of benefits is so high.

Lowery (2007) attempts to find an answer to why interest groups lobby and contemplates four different types of answers. First, lobbying happens purely for instrumental reasons, in accordance to the profit maximizing model. When core interests of groups are threatened, lobbying is necessary even if the chances of successfully influencing policy-makers are low. According to this type of answer,

lobbying happens on a case-by-case basis rather than a continuous exchange of information. However, this instrumental behavior of interest groups does not account for constant participation in the policy-making process and true interest group politics (Lowery, 2007).

A second type of answers assumes that lobbying happens because of the explanations provided by the profit maximizing model and instead focuses more on the reasons why lobbying often fails to achieve the desired policy outcomes (Lowery, 2007). There are always winners and losers and for those who want to change the status quo, the likelihood of a positive outcome is quite small, especially when there are two economic interests put against each other (Smith, 2000). Nonetheless, this explanation also does not account for participation when chances of success are low. It seems that the assumptions of the profit-maximizing model limit the explanatory value of these two types of answers.

A third type of answers sees lobbying as a non-rational activity, away from the instrumentally profit maximizing model. Olson (1965) understands lobbying as a by-product of dependence on certain incentives to overcome free riding. Lowery (2007) builds on this and argues that if lobbying is a by-product of non-issue based mobilization then interest groups can lobby according to any ideology without being limited by the need to deliver policy returns to members. Other non-rational explanations could be that present lobbying the result is of previous instrumental

lobbying or that rare victories are still a big enough incentive to continue lobbying, especially when the stakes are high (Gerber, 1999). However, this set of answers does not account for the reality of lobbying, namely that it is a highly professional activity with knowledge and information as important resources to influence public policy.

The fourth and last set of explanations that Lowery (2007) provides is the most comprehensive one of all four sets. Lobbying behavior is driven by multiple, interrelated goals, thus lobbying occurs for different reasons, not just to pass or block policy proposals. For example, lobbying can occur to retain present members and secure new members or to maintain a good future relationship with public officials by lobbying in support of some of their proposals (Peterson, 1992). Furthermore, the likelihood of successful lobbying depends on changes in the public opinion, the institutional venue in which lobbying takes place, and the size of the political jurisdiction (Kollman, 1998; Smith, 2000; Lowery, Gray & Fellowes, 2005). Thus, this last set of answers highlights multiple goals and contextual forces.

Lowery (2007) finds this last explanation an “*ad hoc, retrospective reinterpretation of a variety of empirical findings whose only truly shared characteristic is the inconsistency of their findings with transactions model expectations*” and attempts to improve it by combining the niche and resource dependence theories in order to explain why interest groups lobby. According to the niche theory, it is required to specify the resources that can help an interest group to survive, for example members

or financial resources (Gray & Lowery, 1996). Since interest groups compete over these resources, it is crucial for an interest group to create a sustainable realized niche encompassing some share of each of the resource arrays comprising its fundamental niche (Lowery, 2007). For example, if an interest group's member level falls below the level at which it can survive, it will not matter how much access they have to decision-makers. The numerous resource arrays that constitute an interest group's fundamental niche can be seen as defining the multiple goals a group might pursue when lobbying, such as retaining present members and securing new members. Thus, the determination of goals will impact which lobby targets and tactics will be selected (Lowery, 2007). Furthermore, according to the niche theory, this determination of goals depends heavily on the level of competition that interest groups face on the several resource arrays. To conclude, the niche theory suggests that the lobbying goals that guide interest groups in their decision to lobby, the choice of lobby targets and the choice of influence tools will be determined by the nature of the competition on the various resource arrays.

Additionally, Lowery (2007) incorporates the resource dependency theory in his explanation of why interest groups lobby in order to make his explanation more comprehensive. The resource dependency theory provides us with the insight that those who control fundamental external resources have the ability to shape an interest group's behavior by threatening to deny access to these resources (Donaldson, 1995). Thus, external actors, whether similar groups or different type of actors, are able to

influence the behavior of interest groups. By incorporating the resource dependency theory, contextual forces can be added to the niche theory, which leads to an emphasis put on a broader array of actors in the political environment (Lowery, 2007). These actors influence contextual forces, which leads to an alteration in the resource arrays put forward by the niche theory. Subsequently, this will impact the priority level that interest groups assign to their different goals.

1.1.3 Strategies to influence policy-makers

This section will attempt to identify some of the major strategies used by interest groups to influence policy-makers. First, the model of lobbying as a resource exchange whereby interest groups exchange access goods against access to policy-makers will be described. Secondly, the different lobby strategies that interest groups use will be analyzed in order to create a full understanding of how interest groups attempt to influence public policies.

1.1.3.1 Lobbying as a resource exchange model

This section will discuss the view of lobbying as a resource exchange model whereby interest groups exchange access goods for access to public officials. According to Bouwen (2004) and Hall and Deardorff (2006), interest groups possess resources that they can use to influence policy-makers. For example, resources can include providing financial support to politicians, offering expertise and information, and enhancing the

legitimacy of legislations (McCarty & Rothenberg, 1996; Bouwen, 2002; Dür, 2008). Interest groups can maximize their utility by trading these resources for political influence. Kohler-Koch (1994) argues that the value of these resources, which is dependent on uncertainty and alternative sources of resources that politicians have at their disposal, will determine to what level interest groups can influence policy-making. Thus, lobbying should not be seen as a one-way exchange of interest groups vis-à-vis EU institutions (Bouwen, 2004). Rather, there is a two-way interaction between interest groups and EU institutions because the latter is dependent on these close contacts in order to properly function.

1.1.3.1.1 Access as intermediate objective

Bouwen (2004) suggests using access of interest groups to EU institutions as an alternative for influence, since measuring influence is quite problematic. The literature on lobby influence is quite limited because, as Leech (2010) argues, “*the search for a definitive statement about the power of lobbyists has become the Holy Grail of interest group studies. All seek it, but are forever being led astray*”. However, access does not necessarily mean that an interest group is able to be influential because they might not be able to turn the advantage of having access into policy outcomes (Bouwen, 2004). Or, as suggested by Eising (2007), it is difficult to judge afterwards whether legislation that is favorable to a certain interest group was due to their lobbying efforts, thus their influence, or due to the policy-makers sharing the same view. Hence, while they are not the same, there does exist a close link between influence and access, as Truman

(1951) argues, “*power of any kind cannot be reached by a political interest group, or its leaders, without access to one or more key points of decision in the government. Access, therefore, becomes the facilitating intermediate objective of political interest groups. The development and improvement of such access is a common denominator of the tactics of all of them*”.

1.1.3.1.2 Access goods

Access goods, a theoretical concept of Bouwen (2002; 2004), are the resources that are being exchanged between the interest groups and the public officials. While interest groups demand access to the EU institutions, in particular their agenda-setting and decision-making process, the EU institutions demand other certain resources in return, which are called access goods. Bouwen (2002; 2004) identified three types of access goods and all of them correspond to three different types of information.

1. Expert Knowledge: It refers to the expertise and technical know-how of private actors on certain policy areas. This type of information, which is very technical and detailed, is required if policy-makers want to develop effective policies.
2. Information about European Encompassing Interest: The European Encompassing Interest concerns the needs and interests of a particular sector in the internal market of the EU. Thus, the EU institutions require information from the private sector on the European Encompassing Interest (for example, from European Banking Federation).

3. Information about the Domestic Encompassing Interest: The Domestic Encompassing Interest refers to the needs and interests of a particular sector in the domestic market. Thus, the EU institutions require information from the private sector on the Domestic Encompassing Interest (for example, from Belgian Bankers Association).

While the access good Expert Knowledge has been talked about in the literature before (Truman, 1951; Pappi & Henning, 1999), the other two access goods have been identified by Bouwen (2002; 2004) himself. Bouwen (2002; 2004) defines the concept of “encompassing interest” as an interest that gets more encompassing when more parties are involved in the formulation of the interest, thus an aggregation of interested individuals or parties needs to happen. For example, a trade association on the national level represents the needs and interests of its member companies, thus it embodies an encompassing interest.

Thus, if interest groups want to gain access to the EU institutions, they need to have access goods. However, not every interest group has the same kind of access goods due to them having different characteristics, such as differences in size, internal organization, type of membership, or geographical concentration (Beyers, 2008; Dür, 2008). The interest groups who provide the most critical access goods, that is those goods that are necessary for a EU institution to continue its operations, will receive the highest degree of access. Kohler-Koch (1994) argues that interest groups will get less

access if the policy-makers have alternative sources for the access goods that they provide.

1.1.3.1.3 Demand and supply of access goods

The exchange of access goods between private actors and the EU institutions can be described as a supply and demand scheme for access goods (Bouwen, 2002; Bouwen, 2009; Chalmers, 2013). The private actors are the ones supplying the access goods. However, they will only gain access to an institution if that institution simultaneously demands the offered access goods. Bouwen (2004) argues that the purpose of this theoretical framework is to explain the difference in the access of numerous interest groups to the EU institutions. In Figure 1 below, the dependent variable Y_{An} signifies the extent to which private actors have access to institution n. The independent variables are Y_S , the supply of access goods, and Y_{Dn} , the demand for access goods. Thus, the theoretical framework attempts to explain the variation of Y_{An} by using Y_S and Y_{Dn} .

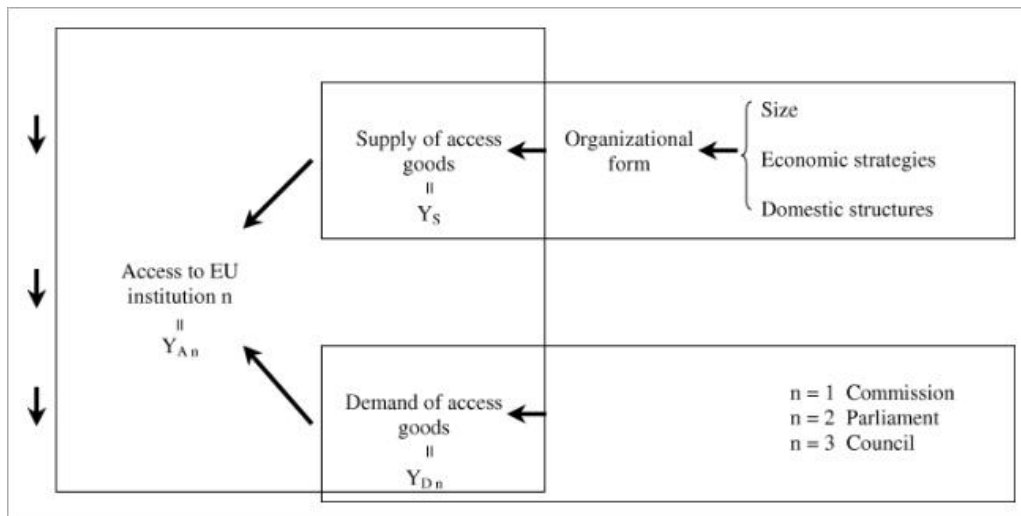


Figure 1: Supply and demand scheme for access goods (Bouwen, 2004)

On the supply side, Bouwen (2004) argues that there is one crucial variable that determines the kind of access goods interest groups can provide, namely their organizational characteristics. There are three essential variables that define the organizational form that actors choose for their lobby activities (see Figure 1). First, size plays an important role. While larger actors might have enough resources to lobby on their own, smaller actors will be dependent on collective action. Secondly, economic strategy can also shape the organizational structure of an actor's lobbying activities. Different market strategies, such as between a national nice player or a global firm, will require different political strategies. Thirdly, the domestic institutional environment of an actor plays an essential role, such as favourable relations between national political players and private actors.

Furthermore, Bouwen (2004) also suggests that there are two other variables besides the organizational form that influence the quantity and quality of access goods provided and the efficiency by which they are offered. First, the number of layers of the organizational form (i.e. individual firm, national, or European association) has an essential role. The more layers, the slower and less flexible the provision of access goods (Schmitter & Streeck, 1999). Secondly, the complexity of the internal decision-making process of the organizational form plays an important role. The more complicated the internal decision-making process, the slower and less flexible the supply of access goods. Salisbury (1984) argues that a hierarchically structured organizational form (e.g. individual firm) will be more efficient at supplying access goods than a decentralized and democratic organizational form (e.g. association).

Bouwen (2004) analyzed how the three variables mentioned above (i.e. organizational characteristics, number of layers, and complexity of the internal decision-making process) influence the supply of access goods in terms of the three main organizational forms, namely individual firm, national or European association. For individual firms, the resource asymmetry between large and small firms can explain the differences in capacity of supplying access goods (Bouwen, 2004). In general, firms will be able to provide Expert Knowledge since they are directly active in the market. However, as was mentioned before, larger firms will have more resources available than smaller firms so they are able to act individually at national and EU level. There is also a difference between large firms with national or European lobby strategies. Large firms

with national strategies are able to provide Information about the Domestic Encompassing Interest if they have a relatively large share in the domestic market. Although, since there is only one firm involved, the “encompassingness” will remain quite limited. Large firms with European strategies are able to provide Information about the European Encompassing Interest. However, since they only own a small market share of the EU single market, it will be difficult for them to be credible.

For associations, their supply of Expert Knowledge will be inferior to that of individual firms since they have fewer resources and they focus on a broader range of issues (Bouwen, 2004). Due to their multi-layered organizational form, associations are too far away from the market reality. However, European associations are better at providing Information about the European Encompassing Interest than individual firms because of their extensive consultation mechanism. They represent the aggregate needs of their member associations, who already bundle the needs and interests of national companies by being their national association, and have expertise in building consensus. Nevertheless, the complexity of the internal decision-making process for building consensus negatively impacts the efficient supply of access goods. A similar thinking can be used for national associations who can provide Information about the Domestic Encompassing Interest.

To conclude the supply side analysis, Bouwen (2004) is able to establish a clear link between the organizational characteristics of interest groups and their capacity to

supply access goods and subsequently gain access to EU institutions. Thus, interest groups can improve their capacity by deliberately adapting their organizational characteristics, for example by combining different channels for lobbying.

On the demand side, Bouwen (2004) argues that the demand for access goods depends on the specific role that each EU institution plays in the legislative process, namely their formal powers and the timing of their intervention in the process. The three main EU institutions (i.e. European Commission, European Parliament and Council of the EU) and their critical access goods will be discussed in detail in a separate section on lobbying in the European Union.

1.1.3.2 Political strategies of interest groups

There are different channels through which interest groups can influence policy-makers and they can be categorized into two different political strategies, namely access or voice strategies (Bouwen, 2002; Beyers, 2004). While voice refers to public political strategies (e.g. protests, media campaigns), access refers to inside lobbying. Beyers (2004) introduces these two concepts as distinct categories that take place in different political arenas with different information being processed. Access strategies are aimed at the venues where political bargaining takes place, thus a collection of advisory bodies, technical committees, agencies, and so forth. Because these kinds of settings are hidden or at least partly hidden from the public, access strategies are known as low profile strategies. Evidently, the strategic provision of information is

only feasible if interest groups have access to policy-makers. Voice strategies, in contrast, encompass activities that take place in different public spheres. In such arenas, the interactions between interest groups, policy-makers and citizens are very visible to the public and actors will deliberately attempt to attract the attention of a broader public. Thus, voice strategies are very high-profile strategies.

Beyers (2004) defines access as “*the exchange of policy-relevant information with public officials through formal or informal networks*”. Thus, in contrast to voice strategies, information, mainly operational and technical, is directly conveyed from interest groups to policy-makers. While actors can achieve access to policy-makers if they deliver credible expertise, this does not mean that information cannot be framed or that arguments cannot be value-loaded (Beyers, 2004). Voice strategies differ from access since information is indirectly conveyed from interest groups to policy-makers. While the information here does not have to be as technical, interest groups will still try to provide valid and reliable information since policy-makers are capable of checking it and even penalizing if the information turns out to be false. With public strategies, actors select and frame information in a way that corresponds to their values, thus voice is used to communicate these values to a broader public (Beyers, 2004).

Beyers (2004) further distinguishes the public voicing of policy positions according to the kind of public that is targeted, namely between information politics and protest politics. While information politics means “*the public presentation of information at*

strategic decision points”, protest politics refers to “*the explicit staging of events in order to attract attention and expand conflict*” (Beyers, 2004). An example of information politics can be Greenpeace holding a press conference whilst the European Parliament is discussing the issue of GMOs. Such a strategy has the ability to reach a large public, but often it is instead aimed at providing information to important policy-makers or specialized constituencies outside the decision-making arena (Beyers, 2004). Protest politics can take the form of demonstrations or letter-writing campaigns and is intended to persuade public officials that a large group of constituencies is enthusiastically supporting the positions that are being put forward.

While both strategies can be categorized separately, it is very common that interest groups combine both into one overall influence strategy. Empirical studies show that interest groups rarely use specialized strategies, but rather prefer to diversify and use a mix of different tactics (Beyers, 2004; Baumgartner & Leech, 1998). According to the literature, there are two constraints put on the choice and combination of tactics by interest groups, namely (1) costs and benefits related to different strategies and (2) the structural position of actors or the access actually achieved (Kollman, 1998; Sloof, 1998). First, Beyers (2004) argues that while information communicated through voice can also be transmitted through access, this does not mean that all information communicated through access can also be transmitted through voice. For example, it is extremely difficult to transmit complex technical information through public demonstrations. Thus, interest groups should prioritize access since it is more efficient

with processing information. However, they should not ignore voice strategies because they can inflict direct political costs on policy-makers. Second, if interest groups have a way to access policy-makers, they are able to transmit information directly at a relatively low cost (Beyers, 2004). Thus, these established interest groups have no need for costly voice strategies and will prioritize access strategies. For those who did not gain access, it may be beneficial to carry out a mix of diverse voice tactics in order to gain acknowledgment and future access.

While some literature argues that 'specific' interests use less voice and more access strategies than 'diffuse' interests (Gais & Walker, 1991; Kollman, 1998), Beyers (2004) disagrees and observes that both strategies can be used by either specific or diffuse interests. The difference between specific and diffuse interests relates to the interests of the constituencies that interest groups represent. Interest groups with a badly defined and scattered constituency are called diffuse interests because they defend interests that are linked to broad and general parts of society (Beyers, 2004). For example, environmental groups and consumer groups are considered to be diffuse interests. Specific interests, on the other hand, defend interests that are directly linked to their constituencies, so they are well-defined and concentrated (Beyers, 2004). For example, sectoral trade unions and agriculture associations are seen as specific interests.

Certain scholars argue that diffuse interests are structurally weak and that is why they prefer to use voice strategies since they cannot gain sufficient access to policy-makers

(Gais & Walker, 1991; Kollman, 1998). However, they are also at a disadvantage because it is difficult to tie political activities to their widespread and fragmented constituencies. Supporters of diffuse interests are sensitive to matters of public concern and in order to mobilize them, diffuse interest groups must give expression to the values and views they follow (Beyers, 2004). Given their concentrated structure, specific interest groups are better at obtaining resources and expertise, thus they can gain more access to policy-makers than diffuse interests. However, Beyers (2004) argues that this particular view on the strategies used by diffuse and specific interests, also known as the canonical model, does not account for the changing conditions in the institutional environment. Policy-makers request reliable and valid information and while specific interests have the expertise and relevant information, they are also known for being strategic and biased towards the interests of their sector or industry (Crombez, 2002). Therefore, policy-makers try to diversify the supply of access in order to not become dependent on certain kinds of interest groups, which means that diffuse interests do have the opportunity to gain access and use access strategies.

The EU has multiple access points, which will be further discussed in the next section, and this supports the goal of having a diversified supply of access (Beyers, 2004). Since each EU institution has different roles in the legislative process, they are all targeted by different types of interests. The European Commission offers more access to specific interests than diffuse ones because it has a large need for expertise and technical information. Due to its technocratic mindset, the European Commission is

not sensitive to public debates, thus public strategies are not very rewarding and protest politics are avoided. The European Parliament, on the other hand, is open towards a variety of mobilized interests due to MEPs needing technical expertise and it being a forum for public debate (Beyers, 2004). While diffuse interests will pursue a strategy of gaining access with information and protest politics, specific interests will mainly focus on pursuing access with information politics. For the Council of the EU, Beyers (2004) argues that it is mostly targeted by diffuse interest groups with voice strategies due to the institution often being the last resort to exert pressure. However, while the Council of the EU is more sensitive to voice strategies than the European Commission, it is not as sensitive as the European Parliament.

1.1.3.3 Framing

Klüver, Mahoney and Opper (2015) argue that the way a debate is being framed by interest groups will influence the outcome of the legislative debate considerably. Policy proposals have diverse effects on different parts of society, while some groups will benefit from a reform, others will lose. Moreover, policy proposals incorporate different policy issues in one single legislative text thus they can be very complex. Baumgartner and Mahoney (2008) reason that interest groups are able to strategically emphasize certain aspects of a policy proposal while simultaneously neglecting others in order to push the debate in the direction they prefer. This lobby strategy is known as framing and is sometimes the only strategy available to resource-poor interest groups.

Thus, the objective of a frame strategy is to put a debate in a particular perspective. As was mentioned above, by framing a topic, certain aspects are highlighted while others are ignored. In addition, a frame can be used to define a problem, identify the causes of a problem, morally evaluate a problem and suggest solutions (Hallahan, 1999). Subsequently, if the general public picks up a frame, this will influence how the public and decision-makers perceive a particular issue. Therefore, framing is a crucial factor that can help lead to greater mobilization of the public. Hence, framing is an important strategy for interest groups.

Klüver, Mahoney and Opper (2015) argue that how interest groups frame a debate depends on the characteristics of interest groups and of the institutional context. For example, the company Shell Oil will not use an environmental frame since it will seem sincere due to them being an oil company. Another example would be that interest groups focus on environmental aspects of the debate when lobbying DG Environment and economic aspects when lobbying DG Enterprise.

Based on their dataset, Klüver, Mahoney and Opper (2015) show that cause groups¹ are more likely to employ public frames, which highlight the effect of a policy proposal on the environment, human rights and consumer protection than sectional groups² and firms. On the other hand, sectional groups are more likely use economic frames than cause groups. Membership groups such as cause and sectional groups, who are both constrained by their members' policy interests, do not have a lot of flexibility when choosing their frame strategy.

1.2 Lobbying in the European Union

This section will discuss lobbying aimed at decision-makers in the EU, specifically in three EU institutions, namely the European Commission, the European Parliament, and the Council of the EU. These three institutions are the main ones involved in EU legislation. The European Commission represents the interests of the EU as a whole while the European Parliament represents the EU's citizens. The Council of the EU represents the governments of the EU member states. The different access points, i.e.

¹ *“Cause groups typically fight for a public good such as environmental protection, health or consumer protection. The membership of cause groups is not restricted; anyone in favour of the principle can become a member of the group. Cause groups represent diffuse, public interests that impose diffuse costs on and benefits to their supporters. The diffuse costs and benefits associated with this form of organization makes it difficult to organize and extract valuable resources from their members.”* (Klüver, Mahoney and Opper, 2015).

² *“Sectional groups represent special economic interests that create concentrated costs and benefits for their supporters. Their task is to look after the specific interest of this particular section of society. These groups typically find it very easy to organize and extract resources from their members, as the group represents its members' primary material interests.”* (Klüver, Mahoney and Opper, 2015).

the frequency of contacts between interest groups and EU institutions, that lobbyists can use to influence outcomes in the EU will be analyzed below.

1.2.1 European Commission

The European Commission is the politically independent executive branch of the EU and has the sole right of initiative, thus it is the one to propose new laws (European Union, 2017). Furthermore, it also implements the decisions that the European Parliament and the Council of the EU agree upon. However, whether it has real autonomy is debatable. According to the intergovernmentalist view, the European Commission is simply an agent of the EU member states since it cannot determine which direction the EU moves to (Van Tol, 2013). However, the supranationalist view claims that the European Commission is actually an autonomous actor because it has the right of initiative and it has the power, given by the Treaties, to undertake action against monopolies (Van Tol, 2013). Bouwen (2004) argues that the European Commission is seen as the most supranational institution in the EU since it is aimed at promoting the collective interests of the EU. Therefore, there is a high demand for Information about the European Encompassing Interest. In contrast, Information about the Domestic Encompassing Interest is only required on an ad hoc basis when the European Commission needs to amend its proposals in order to reach a compromise in the European Parliament and the Council of the EU (Bouwen, 2004).

Due to its role in setting the agenda and proposing and implementing laws, the European Commission is seen as the most important contact point for interest groups. Drafting proposals requires a large amount of expertise, thus Expert Knowledge is the critical access good of the European Commission. Due to understaffing and limited budget, the institution is highly reliant on external resources to acquire this expertise (Bouwen, 2004).

During the agenda-setting stage, large firms and EU associations are more active than national associations when it comes to lobbying the European Commission because of the high chance of new ideas emerging from nowhere (Eising, 2007). In the next stage, namely drafting legislative proposals, the majority of interest groups is very active and tries to push the proposal in their preferred direction. Interest groups emphasize that it is very difficult to influence a proposal of the European Commission when it has already been submitted to the European Parliament and the Council of the EU, thus they try to reach the European Commission before it gets submitted. During the implementation stage, it is domestic interest groups rather than EU associations that lobby the European Commission because they are more concerned about the details of EU legislation and implementation processes (Eising, 2007). The European Commission is never lobbied as a whole since it consists of several individual DGs who are responsible for drafting the legislative proposals on their specific policy areas. Thus, depending on which interests they represent, interest groups will attempt to establish relationships with one or several DGs (Klüver, Braun & Beyers, 2015).

When interest groups lobby the European Commission, they face a trade-off between advocating to gain immediate advantages and going along with the interests of the European Commission in order to gain long-term involvement in their policy-making process (Broscheid & Coen, 2003). Since the European Commission is not directly elected, in contrast to the European Parliament, and it thus not faces direct public pressure, they are free to choose with which interest groups they would like to work with (Grande, 1996). When selecting these interest groups, the European Commission looks at two criteria: necessary technical expertise on policy areas and provision of Pan-European solutions (Woll, 2006). Thus, interest groups have to decide between the following two options: (1) focus on their own priorities with the risk of being ignored by the European Commission or (2) offer Pan-European solutions that are not fully aligned with their own interests but might keep them involved in the policy-making process.

1.2.2 European Parliament

The European Parliament is the law-making body of the EU and it is the only EU institution directly elected (European Union, 2017). It is a co-legislator together with the Council of the EU, thus they pass laws that the European Commission proposes. Since it has a legislative role, the demand for Expert Knowledge is quite limited. The European Parliament shows both intergovernmentalist and supranationalist characteristics (Bouwen, 2002). For example, even though there are multiple

supranational political groups, nationality is still an important factor that divides the assembly of the European Parliament.

Although the European Parliament has gained more powers over the past decades (e.g. through Lisbon Treaty), it is still considered to be less influential than the European Commission and the Council of the EU. However, it is still attractive to interest groups because the institution represents the EU citizens (Van Tol, 2013). In general, the European Parliament represents supranational interests in the decision-making process of the EU. Yet, since national voters elect them, the MEPs are considered to be more open to national or diffuse (e.g. representing the environment or consumers) interests than the European Commission (Eising, 2007). Bouwen (2004) argues that the European Parliament and its MEPs are demanding both Information about the Domestic and the European Encompassing Interest. As it is a directly elected supranational assembly, the European Parliament needs information on the needs and interests in the EU internal market in order to assess the legislative proposals coming from the European Commission. Furthermore, since MEPs pursue re-election, which happens at the national level, they need information on the needs and preferences of their voters, which are located at the domestic level.

Klüver, Braun and Beyers (2015) argue that it is essential to acknowledge the internal configuration of the European Parliament, particularly its political group and committee systems. MEPs are categorized into different political groups (e.g. European

People's Party or Alliance of Liberals and Democrats for Europe) and these groups coordinate the legislative activities of their members. When MEPs cast their votes on policy proposals, they will be influenced by their political group through stick-and-carrot instruments, such as allocating committee seats (Klüver, Braun & Beyers, 2015). Due to the important role of political groups and the differences in ideologies between them, it is essential for interest groups to target the right political groups and their MEPs. Furthermore, the European Parliament is structured into different committees, according to functions, wherein the majority of parliamentary work is conducted (Klüver, Braun & Beyers, 2015). Each committee is chaired by an MEP who plays an important role when setting the legislative agenda and organizing the committee work (Mamadouh & Raunio, 2003). Thus, interest groups will have to keep an eye on which committee is responsible for a proposal and which MEPS chairs that committee. Not only committee chairs should be considered as lobby targets, also rapporteurs and shadow rapporteurs play an important role since they are in charge of drafting reports on legislative proposals (Klüver, Braun & Beyers, 2015). Moreover, they have significant agenda-setting powers and information advantages relative to other MEPs, which makes them also lobby targets for interest groups.

1.2.3 Council of the EU

The Council of the EU provides a forum for the government ministers of all EU member states to coordinate policies and to discuss, amend and adopt laws (European

Union, 2017). Furthermore, it is also one of the main decision-making bodies of the EU, together with the European Parliament. It meets in 10 different configurations, depending on the issue being discussed. For example, when an environmental issue has to be discussed, the national ministers of environment will meet up in the Environment Council. It is the responsibility of the national ministers to commit their governments to all actions agreed upon in the meetings of the Council of the EU.

According to Bouwen (2002), the Council of the EU is the most intergovernmental institution in the EU legislative procedure because national interests dominate the talks. Thus, it is essential that member states identify their domestic interests, which makes them highly demanding of Information about the Domestic Encompassing Interest. It forms the critical access good of the Council of the EU since it provides the member states with information about the needs and interests of the domestic market. However, the secretariat and presidency of the Council of the EU promote a collective purpose and commitment and give the institution some supranational characteristics. Due to this, there is also a (relatively smaller) need for Information about the European Encompassing Interest.

Since the Council of the EU has a lot of decision-making power, it is an important access point for lobbyists. There are different ways of lobbying the Council of the EU. First, an interest group can attempt to lobby national governments of member states. Since the Council of the EU prefers to decide with a consensus, these national

governments do exert a certain influence. Secondly, interest groups can share their concerns with the different national permanent representations in Brussels. These representations are part of COREPER I and II and are in charge of preparing the meetings and decisions of the national ministers (Eising, 2007). Furthermore, COREPER I and II also coordinate the work of the working groups and preparatory bodies of the Council of the EU, which are composed of mostly national experts. Thirdly, lobbyists can also target the Council working groups since the majority of important decisions on proposals are being made at this level (Eising, 2007).

1.2.4 Conclusion on EU access points

Overall, it can be concluded that interest groups should try to access the working level of the EU institutions more than the political leaders. The DGs of the European Commission, the Council working groups, and the chairs and rapporteurs of the European Parliament committees are in charge of drafting policy proposals and focusing on the details, thus they are much more interesting to interest groups (Eising, 2007). Furthermore, bureaucratic staff is also greatly dependent on external information and support due to a lack of resources and sometimes a need for legitimacy. Political leaders, for example national ministers or even Commissioners, are not concerned with policy details; rather they focus on crucial or disputed issues. While they are also important to lobbyists (e.g. for establishing broad policy principles), they will access them less frequently than the bureaucratic staff.

2. Methodology

This chapter will set out the methodological approach that was used to explore the lobby strategies of interest groups in the EU. The aim of this thesis is to examine the following research question: “How do interest groups influence policy-makers?”. On the basis of the preceding literature review, certain arguments can be translated into hypotheses.

First, the choice of an interest group to pursue an access or voice strategy is dependent on which EU institution is being targeted. For example, an access strategy might fit better when lobbying the European Commission because, due to its technocratic mindset, it is not very sensitive to public debates and thus public strategies are not very rewarding. Based on this, I hypothesize as follows:

***Hypothesis 1:** Interest groups will use an access strategy when targeting the European Commission, while they will use a voice strategy when targeting the European Parliament or Council of the EU.*

Secondly, the type of interest group will determine which EU institution will be targeted. Since each EU institution has a different role in the legislative process and thus different preferences towards interests' input, they are targeted by different types of interests. For example, the European Commission is more open towards specific

interests than diffuse ones since it has a large need for expertise and technical information. Based on this, I hypothesize as follows:

***Hypothesis 2:** While specific interests will target the European Commission, diffuse interests are more likely to target the European Parliament and Council of the EU.*

Thirdly, the way interest groups frame a debate can help them with successfully lobbying policy-makers by encouraging mobilization of the general public. By framing a topic, certain aspects can be highlighted while others can be ignored. If the general public picks up a frame, this will influence how the public and decision-makers perceive a particular issue. Based on this, I hypothesize as follows:

***Hypothesis 3:** How interest groups frame an issue can impact the response of the general public and subsequently elected politicians.*

These hypotheses will be explored by a qualitative research approach, which is generally described as a method to study the why and how of human behavior. As is usually the case with qualitative research, it will be in the form of a case study. The case study will be on GMOs since it is one of the most controversial issues in the EU and thus generates a lot of lobbying. GMOs have an infamously bad reputation in the EU, especially when compared to the situation in the United States. Interest groups that are part of the anti-GMO lobby accuse supporters of trying to push GMOs in the agricultural sector without sufficiently contemplating health and environmental risks.

On the other hand, interest groups of the pro-GMO lobby accuse opponents of exaggerating potential risks in an attempt to manipulate the public opinion against GMOs. Furthermore, both sides also blame the public of having a lack of understanding of the benefits and risks of GMOs.

To collect data, two common methods of data collection applied in qualitative research were undertaken, namely interviews and document analysis. For the interviews, a semi-structured approach was used since it allows some form of structure to compare with other interviews but also some leeway for interviewees to elaborate (May, 1997). According to Billiet (1996), the key advantage of semi-structured interviews is flexibility since one has the opportunity to pursue topics or issues that were originally not expected when drafting the questionnaire. Moreover, flexibility is particularly crucial since the topic of the interviews is lobbying, a very sensitive and delicate issue. However, it has to be mentioned that since interviews are an exchange between humans, there are restrictions to the quality of the generated data. Besides a risk of researcher bias, the data might also be unreliable or biased due to the limited amount of participants. For the document analysis, data from existing documents was obtained, including newspaper articles, position papers of interest groups, statements of governments/institutions, and so forth.

After contacting numerous EU institutions and interest groups, it was possible to conduct 15 semi-structured interviews with EU institutions, business interest groups,

and civil society interest groups (Smeyers, Gerard, & Nikolic, 2016). Out of the 15 interviews, 12 happened face-to-face, 2 via phone/Skype and 1 via email. Furthermore, 6 of the interviews were with regional, national and EU institutions, 7 with business interest groups, and 2 with civil society interest groups. Compared to the institutions and business interest groups, it was quite difficult to achieve interviews with civil society interest groups due to them having a lack of staff and high work pressure. In Annex 1, a list of all interviewees and dates of the interviews can be found. Additionally, in Annex 2, examples of the questionnaires used for the interviews with business interest groups, civil society interest groups, and European institutions can be consulted. After generating the data, it was analyzed and interpreted in light of the following case study.

3. Case study: GMOs in the EU

GMOs can be defined as “*organisms (i.e. plants, animals or microorganisms) in which the genetic material (DNA) has been altered in a way that does not occur naturally by mating and/or natural recombination*” (World Health Organization, 2014). While desirable characteristics of plants and animals have been appearing naturally in the genetic make-up of these plants and animals for several thousands of years, only recently it has been made possible to modify the genetic make-up of living organisms by using genetic engineering (European Commission, 2017a). When a genetic material is altered artificially to give it a new property (e.g. better resistance of plants to diseases), it receives the name of GMO. All food and feed that contains, consists of, or is produced from GMOs are called GM food or feed.

While initial research on GMOs commenced in the 1980s, it was not until halfway the 1990s that the first GMO crops were introduced onto the market. The first noteworthy sowings of GM crops only took place in 1996 and moreover, it was almost exclusively situated in the United States (DG AGRI, 1999). Over the past few years, farmers around the world have widely adopted GM technology and in 2014, GM crops were planted in 28 countries of which 20 developing (International Service for the Acquisition of Agri-biotech Applications, 2014). Furthermore, the United States continues to be the leader in the field with 40% of global production of GM crops. When looking at the top five of countries, we can see that four out of five are located

on the North and South American continents, namely United States, Brazil, Argentina, and Canada (International Service for the Acquisition of Agri-biotech Applications, 2014).

When we compare Europe with the abovementioned countries, it can be concluded that Europe is a relatively small market for GM crops. There is only one GM crop allowed to commercially grow in the EU, namely Monsanto's insect resistant (Bt) corn MON810. However, there are only six EU member states that currently allow and grow it, namely Spain, Portugal, Czech Republic, Slovakia and Romania. Out of these member states, Spain is by far the biggest European producer since it accounts for 92% of the total area under Bt corn which in turn accounts for 1,56% of EU's total maize-growing area (Canadian Biotechnology Action Network, 2017). Furthermore, when a GMO receives authorization for cultivation and industrial processing in the EU, it does not mean that this GMO obtains this authorization forever. For example, even though the Amflora potato, a GM starch potato, received authorization in 2010, it is currently not allowed in the EU anymore due to procedural mistakes made by the European Commission according to the General Court of the EU (EurActiv, 2013).

Oddly, while the EU grows relatively few GMOs, it is one of the world's biggest consumers of GM feed and every member state imports it. EU member states import approximately 40 million tons of GM animal feed, mainly GM soy, from the Americas (Canadian Biotechnology Action Network, 2017). Thus, while you will not see a lot of

GM foods in the EU, there are more than 60 GM crops approved for import into the single market (Chow, 2015).

This case study will include an in-depth analysis of interest representation within the scope of GMOs in the EU, with a particular focus on lobby strategies. Furthermore, since the interviews were mainly focused on the EU GMO cultivation Directive (nr 2015/412), the case study will attempt to find an answer to who among the interests were the winners and losers of this Directive. First, an overview of EU policy towards GMOs and GMO cultivation will be provided in order to better understand the topic and interplay between the different actors. Secondly, the different stakeholders, i.e. institutions and private actors, will be presented. Thirdly, the lobby behavior of these interests will be analyzed within the scope of the GMO cultivation Directive.

3.1 EU policy context of GMOs

3.1.1 EU policy towards GMOs

3.1.1.1 Legal framework

The main idea behind the GMO legislation of the EU is to be precautionary. Thus, this means that all potential risks of GMOs should be assessed beforehand (i.e. pre-market authorization) and monitored after they have entered the EU single market (i.e. post-market environmental monitoring) (European Commission, 2015a). Currently, there are three Directives and three Regulations that form the building blocks of the EU's

legislative framework related to GMOs: Directive 2001/18/EC, Regulation (EC) 1829/2003, Directive (EU) 2015/412 (amending Directive 2001/18/EC), Regulation (EC) 1830/2003, Directive 2009/41/EC, and Regulation (EC) 1946/2003. The legal framework aims to: (1) protect the environment and health of humans and animals, (2) provide harmonized procedures, (3) ensure clear labeling of GMOs to keep consumers and professionals informed, and (4) ensure GMOs are traceable after entering the market (European Commission, 2017b).

Directive 2001/18/EC provides the general framework that regulates GMOs in the EU single market and attempts to clarify the definitions and concepts surrounding GMOs. The Directive describes the member states' obligations and the EU rules concerning GMO cultivation, entry to the single market, and the authorization procedures. While the free movement of goods, capital, services, and people (the "four freedoms") within the EU needs to be respected at all times, Article 23 of Directive 2001/18/EC allows member states to restrict or prohibit GMO authorization on their territory if, post-authorization, new information shows that there are possible health and environmental risks.

In addition, Regulation (EC) 1829/2003 goes into more detail with regards to the authorization procedures for the cultivation and placing on the market of GM feed and food. First, a company should send an authorization request to the appointed agency in their member state. Subsequently, the request will be transferred to the EFSA, which

will perform a risk assessment based on all potential environmental, health and animal risks. Next, the European Commission will base its decision to grant or reject authorization of the requested GMO based on the risk assessment performed by EFSA. When the Commission makes a decision on the GMO authorization, the file is sent to an experts committee comprised of member states' representatives who need to decide by qualified majority. If there is no qualified majority reached in the standing or appeal committee, the file will be returned to the European Commission who will take the final decision (European Commission, 2017c).

3.1.1.2 Legal basis

Concerning the legal basis of the different EU legislative pieces on GMOs, they can be found in Article 14 and 95 of the Treaty establishing the European Community (Nice consolidated version). While Article 14 aims to establish an internal market and break down internal trade barriers, Article 95 states that there should be high levels of protection in the area of health, safety, environment and consumers. Furthermore, Article 95 grants member states the right to uphold national safeguards based on scientific arguments if major needs occur or the (working) environment is endangered. Regarding the decision-making procedures of abovementioned Directives and Regulations, the co-decision procedure (i.e. ordinary legislative procedure after Lisbon treaty) was used whereby the European Parliament and the Council of the EU had an equal say on the issue.

3.1.2 Context of GMO cultivation Directive 2015/412

3.1.2.1 General context

Although the EU had the aim of creating a clear legal framework regarding GMOs in order to promote innovation but also protect consumer health and the environment at the same time, problems quickly surfaced. First, disagreements arose between member states causing files regarding authorization to be sent back to the European Commission without an opinion from the standing or appeal committee (European Commission, 2015b). Thus, the European Commission had to decide on GMO authorization itself and the EU institutions were not pleased with how this turned out. This opinion was confirmed during the interviews by some of the interviewees who work for the EU institutions (Smeyers, Gerard, & Nikolic, 2016). These difficulties might explain why there have only been two GM crops, MON810 by Monsanto and Amflora starch potato by BASF, approved for cultivation since 2001 and Amflora's authorization was even withdrawn.

Secondly, numerous member states have used the safeguard clause provided by Directive 2001/18/EC to ban MON810 even though EFSA disregarded these bans because they were not based on scientific reasons. However, the Council of the EU allowed these member states to ban the GM crop with a qualified majority (Jarvis, 2009). Thirdly, there is a very negative opinion of the public towards GMOs and the public shares the view that GMOs are dangerous (European Commission, 2015a).

Lastly, while business interest groups were irritated by the slow authorization procedures, civil interest groups remained concerned about the possible risks and harmful side effects of GMOs. To conclude, both the EU institutions and diverse stakeholders involved were unsatisfied with the situation of GMOs in the EU.

3.1.2.2 Different steps towards the GMO cultivation Directive

In 2009, several member states suggested changes to the current GMO authorization system with the hope of unlocking the paralysis described above (Jarvis, 2009). In general, these proposals included: (1) more freedom for member states to decide whether they would allow GMO cultivation on their territory and (2) allowing member states to base their decisions on socio-economic arguments. One year later, in 2010, the European Commission also came up with a legislative proposal regarding GMO cultivation in the EU. Both proposals of some member states and the European Commission will be further discussed below.

3.1.2.2.1 Dutch and Austrian proposal

A first step towards changing the legal situation was a proposal by the Netherlands in March 2009 to the Agriculture Council. The Dutch government suggested a system wherein member states would be able to decide on the authorization of GMO cultivation themselves based on socio-economic criteria rather than using the safeguard clause (Jarvis, 2009). This proposal aimed to increase member states' power in the decision-making process regarding GMO cultivation on their territory. Furthermore,

the Dutch government expected that this new system would lower political pressure and speed up the EU procedures for authorization since member states would have greater powers to ban GMOs.

A few months later, in June 2009, the Austrian government also proposed changes to the Environment Council, which were based on the previous Dutch proposal and supported by 12 other member states (Jarvis, 2009). This proposal included changes that could unlock the unsatisfactory situation at that time, such as an “opt-out” clause for member states to ban or restrict the cultivation of already authorized GMOs (Austrian Delegation, 2009). Furthermore, these member states urged the European Commission to come up with a proposal based on the discussions surrounding the Dutch and Austrian proposals. In September 2009, Barroso, President of the European Commission at that time, stated in his political guidelines that while sometimes the EU does need common rules, often a common framework could also be enough (Barroso, 2009). In the area of GMOs, Barroso argues that member states should have the freedom to decide themselves whether or not they allow GM cultivation on their territory. One year later, in June 2010, the European Commission published its long-awaited legislative proposal.

3.1.2.2.2 European Commission proposal

In its proposal, the European Commission included the option for member states to ban or restrict GMO cultivation on their territory based on criteria not taken into account

by EFSA's risk assessment or not linked to the safeguard clause of Directive 2001/18/EC. The proposal has Article 114 (formerly Article 95) of the Treaty on the Functioning of the European Union as its legal basis. Although DG Health and Food Safety (DG SANTE) was the main responsible one for the GMO cultivation file, other DGs such as DG Agriculture (DG AGRI), DG Internal Market, Entrepreneurship and SMEs (DG GROW), and DG Environment (DG ENVI) were also consulted while drafting the proposal. However, the European Commission did not contact any stakeholders for their opinion and expertise during the drafting because the proposal was initiated by some member states.

According to the information obtained during the interviews, there were no contacts between the European Commission and the various stakeholders before the proposal was published (Smeyers, Gerard, & Nikolic, 2016). Since the role of the European Commission switches from an initiator to a facilitator after the proposal gets published, it would be expected that interest groups shift their lobby efforts to the European Parliament and different member states. However, during the interviews, it was mentioned that interest groups actually still lobbied the European Commission and the involved DGs after the proposal was published (Smeyers, Gerard, & Nikolic, 2016). Furthermore, the European Commission took its role as facilitator very serious and had multiple intense contacts with both the European Parliament and the Council of the EU between 2010 and 2015 to speed up the process.

3.1.3 Position of the legislative EU institutions

3.1.3.1 European Parliament

Within the European Parliament, it was the Committee on the Environment, Public Health and Food Safety (ENVI Committee) that received the legislative proposal of DG SANTE. Besides ENVI Committee, other Committees, such as the Agriculture and Rural Development Committee, the Legal Affairs Committee, and Industry, Research and Energy Committee were also involved in the discussion of the proposal. The latter, however, was the only one to not give an opinion. The rapporteur for this proposal was provided by the political party Alliance of Liberals and Democrats for Europe (ALDE) (European Legislative Observatory, 2016).

While the European Parliament agreed with the European Commission's proposition to give member states more freedom on GMO cultivation, they did not accept the basis on which member states could ban or restrict them (ENVI Committee, 2011). First, the European Parliament argued that the legal basis of the proposal should be Article 192 related to environment rather than Article 114 related to the internal market. Furthermore, in its first reading, the European Parliament added a non-exhaustive list of arguments to ban or restrict GMO cultivation, including environmental risks, scientific uncertainty, and socio-economic criteria. The proposal of the European Commission, which excluded environmental risks, clearly differs from the European Parliament's position, which was also supported by civil society interest groups (ENVI

Committee, 2011).

Throughout the interviews, it became clear that while the rapporteur and shadow rapporteur had contacts with numerous stakeholders, the MEPs were reluctant to share specifically with whom they had contact and the frequency of meetings. Yet, certain observations from the interviews could still be made (Smeyers, Gerard, & Nikolic, 2016). First, there is a significant difference between (shadow) rapporteurs and MEPs who are just Committee members regarding the frequency of contacts with interest groups. While (shadow) rapporteurs were personally contacted by different interests, other MEPs just received position papers and contacted relevant interests themselves. Position papers are not very important according to MEPs; they attach more value to personal contacts as they form a vital channel of communication. Secondly, MEPs seemed to have more personal contacts with national rather than European associations. This is in line with what Eising (2007) arguments, namely that MEPs are considered to be more open to national interests than the European Commission because they are elected by national voters.

Thirdly, when making the decision to approach an MEP or not, interest groups take into account the political group affiliation and previous opinions of that MEP. For example, since interest groups are aware that the political party European Free Alliance has a very negative opinion towards GMOs, the MEPs associated with this party will mostly be targeted by interest groups aiming to protect the environment. Interest

groups will likely target those political parties who do not have clear positions towards certain topics, such as GMOs, more than other political parties. Lastly, some interviewees disagreed with the statement that member states attempt to influence their national MEPs even though contacts between them certainly happen.

3.1.3.2 Council of the EU

As was mentioned before, 13 member states initiated a proposal to change the GMO legislative framework. However, while the European Parliament was successful in completing its first reading in one year (June 2010 – July 2011), the Council of the EU took four years until it published its first reading' opinion (June 2010 – June 2014) (European Legislative Observatory, 2016). When Denmark held the Presidency of the Council of the EU in early 2012, it categorized this file as a priority in its agenda. Yet, no agreement was reached since several member states remained against the proposal, and this for different reasons (e.g. internal market concerns). The member states opposing the proposal the strongest were Belgium, France, Germany, Spain and the United Kingdom (EurActiv, 2012). After the Danish Presidency, the following Presidencies did not actively pursue the topic. However, when Greece took the Presidency in early 2014, the situation came in motion again with a new proposal offered by the United Kingdom.

This new proposal of the Greek Presidency was different from the European Commission's proposal and also from the amendments made by the European

Parliament (Council of the European Union, 2014). First, it argued that Article 114 rather than Article 192 should form the legal basis of the proposal, which went against the European Parliament's suggestion but in favor of the European Commission's proposal. Secondly, it reasoned that the proposal should be a Directive rather than a Regulation, which was what the European Commission proposed. Thirdly, it went along with the European Parliament's amendments regarding the criteria to ban or restrict GMOs, excluding environmental risks. Fourthly, the Greek Presidency proposed a two-phase system that allowed member states to ban or restrict GMOs both before and after the authorization by the EU. The proposal of the European Commission only talked about banning GMOs after the authorization had already taken place. In the first phase, member states would be able to request from companies to exclude their territory from the company's application for authorization. While companies preferred this additional first phase in order to prevent negative publicity, NGOs did not like it since it would give companies the choice to agree or disagree with the member state.

Within the Council of the EU, there were member states in favor and against of GMOs, thus it took a long time before a consensus was reached. Furthermore, there also needed to be a consensus between the Council of the EU and the European Parliament, which happened with the help of trilogues³ (Smeyers, Gerard, & Nikolic, 2016). The final proposal of the European Commission took into account some of the Council of the EU's arguments such as (1) Article 114 as the legal basis of the proposal, (2) the proposal became a Directive instead of a Regulation, and (3) the two-phase system was used (Directive EU (2015/412, 2015). For the European Parliament, it was successful in securing the extra criteria to ban or restrict GMO cultivation.

3.1.4 EU interest groups in the field

There are numerous interest groups involved with the issue of GMOs in the EU, both on the pro- and anti-side. Generally, business interest groups can mostly be found on the pro-GMO side while civil society groups can be found on the anti-GMO side. Next, a short overview will be given of all interest groups, both business and civil society, deemed important and involved on the issue of the GMO cultivation Directive.

³ Trilogues are “*informal tripartite meetings attended by representatives of the European Parliament, the Council and the Commission*” (European Commission, 2012). They happen very ad hoc and there is no standard format regarding content, purpose, attendance, and so forth. While trilogues are very important in EU decision-making, they are also very contested due to the secrecy around them and lack of legal basis.

3.1.4.1 Business interest groups

Concerning business interest groups, there are a wide variety of trade associations, companies and PR/law firms that might have lobbied policy-makers involved with the issue of GMO cultivation in the EU. The table below (Table 1) shows business interest groups that were deemed important on the issue:

Nr.	Entity	Type of entity
1.	EuropaBio	European trade association
2.	Monsanto	Biotech company
3.	Dupont/Pioneer	Biotech company
4.	Dow Agrosciences	Biotech company
5.	Syngenta	Biotech company
6.	BASF	Biotech company
7.	Bayer	Biotech company
8.	ILSI Europe	Think tank
9.	Agricultural Biotechnology Council	National corporate lobby group
10.	Edelman Brussels/The Centre	PR firm/consultancy
11.	Hume Brophy	PR firm/consultancy
12.	Copa Cogeca	European farmer association

13.	Futuragra	National farmer association
14.	Farmer Scientists Network	Farmer network

Table 1: List of business interest groups (Smeyers, Gerard, & Nikolic, 2016)

3.1.4.2 Civil society interest groups

Concerning civil society interest groups, there are a wide variety of NGOs representing environmental, consumer and farmer interests that might have lobbied policy-makers involved with the issue of GMO cultivation in the EU. The table below (Table 2) shows civil society interest groups that were deemed important on the issue:

Nr.	Entity	Type of entity
1.	Greenpeace European Unit	Branch of Greenpeace International
2.	Slow Food	International grassroots organization
3.	Corporate Europe Observatory	Think tank
4.	Friends of the Earth Europe	Branch of Friend of the Earth International
5.	European Environmental Bureau	Federation of environmental organizations

6.	IFOAM EU Group	Umbrella organization
7.	Safe Food Advocacy EU	NGO
8.	Testbiotech	Expert group
9.	GM Watch	NGO

Table 2: List of civil society interest groups (Smeyers, Gerard, & Nikolic, 2016)

3.2 Analysis of lobby behavior

3.2.1 Business lobby behavior

This section will analyze the behavior of certain business interest groups regarding the GMO cultivation Directive. As was mentioned before, seven business interest groups were interviewed on the issue of GMOs, namely representatives of EuropaBio, Monsanto, Dow AgroSciences, Futuragra, Copa Cogeca and Hume Brophy (Smeyers, Gerard, & Nikolic, 2016). Their lobby behavior will be analyzed in light of which lobby strategies they used (i.e. access or voice strategies) and if they applied an access strategy, whether they gained access to policy-makers or not. Furthermore, their impact on the GMO cultivation Directive will also be examined.

3.2.1.1 Which lobby strategies were used?

During the interviews, business interest groups were asked what strategies they used to lobby for their interests (Smeyers, Gerard, & Nikolic, 2016). More specifically, they were asked whether they used Beyer's (2004) access or voice strategies. Table 3 below

summarizes the answers of each business interest group interviewed. While all of them stated they used access strategies, only two of them, Monsanto and Futuragra, used a voice strategy as well. Thus, all interviewed business interest groups tried to influence policy-makers at the venues where political bargaining takes place (Beyers, 2004). Yet, only two groups additionally performed lobby activities that took place in the public sphere (Beyers, 2004).

Interestingly, these two groups used voice strategies in a different way and for a different purpose. Monsanto created public campaigns to convince the general population and decision-makers that GMOs can be positive for society. Futuragra, in contrast, attempted to gain more access to decision-makers and more legitimacy through sending public letters to the European Commission and the Italian Ministry of Agriculture. However, it has to be noted that business interest groups also perceive what constitutes access and voice strategies in a different way. What some consider to be a voice strategy' activity, others do not. For example, both Copa Cogeca and Futuragra send similar public letters to the European Commission but only the representative of Futuragra considered this to be an activity related to voice strategy.

To conclude, business interest groups involved with the issue of GMO cultivation in the EU chose access strategies as their main lobby strategy and two groups supplemented it by adding voice strategy.

Entity	Access strategy	Voice strategy
EuropaBio	Yes	No
Hume Brophy	Yes	No
Dow AgroSciences	Yes	No
Monsanto	Yes	Yes
FuturaGra	Yes	Yes
Copa Cogeca	Yes	No

Table 3: Business interest groups' lobby strategies (Results based on data from interviews by Smeyers, Gerard, & Nikolic, 2016)

It has to be noted that, as described in the literature review, besides access and voice strategies, framing strategies also play an important role. The topic of GMOs in the EU has been framed as emotional from the time it was put on the policy agenda. Business interest groups clearly failed to frame the topic in a more scientific way (Smeyers, Gerard, & Nikolic, 2016). Thus, the business interest groups involved with this issue did not have the opportunity to use framing strategies. Consequently, this is partly the reason why so little business interest groups pursued voice strategies since it would most likely damage their public image.

3.2.1.2 Access points

Since all interviewed business interest groups stated that they used access strategies, their outreach to decision-makers, i.e. access points, can now be further analyzed. During the interviews, the interviewees were asked with which EU institution they had the most contacts and whether they also lobbied at the national level. For the analysis,

a distinction was made between political and technical contacts in order to better understand what type of contact interest groups had with the institutions (Smeyers, Gerard, & Nikolic, 2016). Political contacts concern contacts in the form of face-to-face meetings with or official letters to political actors such as MEPs or representatives of the Permanent Representations. Technical contacts relate to contacts with impartial EU civil servants through participation in expert groups of the European Commission or through face-to-face meetings. Thus, political contacts seem to relatively be a more public way of getting into contact with institutions than technical contacts.

Table 4 below gives an overview of the contacts that the different interviewed business interest groups had with national and EU institutions. Out of the three main EU institutions discussed in the literature review, namely European Commission, European Parliament and Council of the EU, the European Commission seems to be the most lobbied institution by business interest groups. There was one exception; Hume Brophy targeted the European Parliament the most since its client had already made contacts with the European Commission so it would have been a waste of resources.

Interestingly, while the European Commission generally becomes less interesting to interests after the legislative proposal is issued, it still remained the most targeted EU institution even after the proposal was published. A closer look at the contacts with the European Commission shows that DG SANTE was the most targeted DG, which

makes sense since it was the lead DG for the GMO cultivation file. Another exception can be seen here, namely Futuragra did not contact any specific DG but it just sent a general letter to the European Commission itself. All contacts of business interest groups with the European Commission were technical, which fits with its technocratic mindset.

For the European Parliament, in contrast, the contacts were of a political nature and consisted of meetings with political actors such as MEPs or representatives of the political parties. For this institution, it is more difficult to see a pattern than with the European Commission. While some business interest groups such as Copa Cogeca were able to reach the rapporteur and shadow rapporteur, others such as Monsanto had almost no access to relevant actors. One of the reasons why Monsanto had restricted access is due to its negative image among EU citizens, who have a significant impact since they are the voters on who MEPs depend on to get re-elected.

When looking at the Council of the EU, it appears that half of the interviewed business interest groups, namely Dow AgroSciences, Monsanto and Futuragra, did not have any contacts with this institution. The other half had contacts with the Permanent Representations and the Rotating Presidency (i.e. one member state every six months) but none with the Council Secretariat, which consists of impartial civil servants. Based on this, it can be argued that the contacts of the interests with the Council of the EU were mostly of a political nature.

Concerning national governments, the majority of the interviewed business interest groups had no contacts with member states. Only two interviewees, Monsanto and Futuragra, mentioned they contacted certain national governments on the issue of GMO cultivation. For Monsanto, lobbying national governments was quite an important activity of its strategy, thus they had direct contacts with ten member states. Since Futuragra is an association consisting of Italian farmers, it evidently had contacts with the Italian government. However, it has to be noted that EuropaBio and Copa Cogeca did not contact individual member states because they are European associations, and thus their members are responsible for contacting their own national governments. Due to a lack of internal follow-up mechanisms, both associations were not aware whether their members were successful in contacting and lobbying the member states (Smeyers, Gerard, & Nikolic, 2016).

To conclude this section on access points of business interest groups, it can be said that quite a lot of lobbying happened at the EU institutions in Brussels. The majority of interests used the European Commission as their main access point, with the European Parliament as second. The Council of the EU and the individual member states were not targeted that much. Regarding the type of contacts, the interest groups attempted to both contact politicians and technocrats. However, it seems that due to the emotional framing of the debate, political contacts were limited relative to technical contacts.

Entity	Targeted EU institution⁴ (in order of importance)	Contacts with EC	Contacts with EP	Contacts with Council of EU	Contacts with individual member states
EuropaBio	1. EC 2. Council 3. EP	Technical with DG SANTE	Political with political groups	Political with Permanent Representations and Rotating Presidency	None
Hume Brophy	1. EP 2. Council 3. EC	None but client had contact with DG SANTE, AGRI and TRADE	Political with a shadow rapporteur and some MEPs from ENVI Committee	Political with Permanent Representations and Rotating Presidency	None
Dow AgroSciences	Only EC	Technical with DG SANTE	None	None	None
Monsanto	1. EC 2. Member states 3. EP	Technical with DG SANTE	Limited political with rapporteur and shadow rapporteur from ENVI Committee	None	Political with Germany, France, UK, Italy, Spain, Poland, Romania, Netherlands, Belgium, Denmark
FuturaGra	1. EC 2. EP 3. Member	None	Limited political with some MEPs	None	Italy

⁴ EC refers to European Commission, EP to European Parliament and Council to Council of the EU.

	state		from ENVI Committee		
Copa Cogeca	1. EC 2. EP 3. Council	Technical with DG SANTE and AGRI	Political with rapporteur, shadow rapporteur and representatives of political groups from ENVI and AGRI Committee	Political with Rotating Presidency	None

Table 4: Access points of business interest groups (Results based on data from interviews by Smeyers, Gerard, & Nikolic, 2016)

3.2.1.3 Impact on GMO cultivation Directive?

At the end of the interview, each interviewee was asked whether they thought that their business interest group had an impact on the GMO cultivation Directive and whether were satisfied with the whole process and end result (Smeyers, Gerard, & Nikolic, 2016). As can be seen in Table 5 below, none of the interviewees thought that they had any impact on the final text of the Directive. They argued that this was due to the fact that the debate on GMOs and GMO cultivation in the EU is framed as emotional and not scientific at all. Business logic is being replaced by politics and emotions. Other arguments were the lack of clear position on the issue, for example within Copa Cogeca. While some members were in favor of GMO cultivation in Europe, others were against it, which made it difficult for Copa Cogeca to represent one clear position. Another argument was Hume Brophy being a PR firm specifically hired to lobby

against the Directive and had thus no relevant access goods besides it representing its client (Bouwen, 2002).

Regarding the satisfaction level of the interviewees, it was clear that none of them were satisfied with the final Directive. In general, all of them were unsatisfied due to a remaining uncertainty and no clear EU-wide policy regarding GMO cultivation in the EU. Furthermore, the way the debate was framed, in a non-scientific emotional way, frustrated the business interest groups since this negatively influenced how the general public and policy-makers look at GMOs. For example, EuropaBio and Monsanto faced communication problems when they attempted to explain what biotechnology and GMOs are to the general public and policy-makers. Some groups also mentioned that if they had known that so many member states would individually ban GMO cultivation on their territory, they would have changed their lobby strategy.

Entity	Perceived impact	Satisfaction level
EuropaBio	None	Unsatisfied due to emotional framing of debate from the beginning and lack of clear communication
Hume Brophy	None	Unsatisfied although had low expectations
Dow AgroSciences	None	Unsatisfied although did not do anything
Monsanto	None	Unsatisfied due to emotional framing of debate from the beginning and lack of clear communication
FuturaGra	None	Unsatisfied due to emotional framing of debate from the beginning

Copa Cogeca	None	Unsatisfied due to emotional framing of debate from the beginning
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Table 5: Perceived impact on Directive and level of satisfaction of business interest groups (Results based on data from interviews by Smeyers, Gerard, & Nikolic, 2016)

To conclude this section on the lobby behavior of business interest groups, it is hard to categorize these interests as either a winner or loser, even though their lobby activities were relatively inefficient. The business interest groups were successful in avoiding a further deterioration of their public image with the incorporation of the two-phase system in the Directive. In the first phase of this system, member states would be able to request from companies to exclude their territory from the company’s application for authorization, and this in a subtle and quiet way. While this meant that GMO cultivation could be banned in certain countries, it also allowed companies to at least prevent negative publicity, it is thus a second-best solution. There are some lessons that business interest groups can learn from this case: (1) invest more time and resources into framing or re-framing the debate, (2) clearly present your position, and (3) achieve legitimacy to improve position towards decision-makers (Smeyers, Gerard, & Nikolic, 2016).

3.2.2 Civil society lobby behavior

This section will analyze the behavior of certain civil society interest groups regarding the GMO cultivation Directive. As was mentioned before, two civil society interest groups were interviewed on the issue of GMOs, namely representatives of Slow Food

and Greenpeace European Unit (Smeyers, Gerard, & Nikolic, 2016). Their lobby behavior will be analyzed in light of which lobby strategies they used (i.e. access or voice strategies) and if they applied an access strategy, whether they gained access to policy-makers or not. Furthermore, their impact on the GMO cultivation Directive will also be examined.

3.2.2.1 Which lobby strategies were used?

During the interviews, civil society interest groups were asked what strategies they used to lobby for their interests (Smeyers, Gerard, & Nikolic, 2016). More specifically, they were asked whether they used Beyer's (2004) access or voice strategies. Table 6 below summarizes the answers of each civil society interest group interviewed. Both interviewees stated that their organization used access strategies, thus they tried to gain access to policy-makers. However, only Slow Food additionally used a voice strategy and attempted to inform and raise awareness of the public through social media and comprehensible articles. It was important for them to explain the very technical topic of GMOs in a simple way in order for the public to understand. This is in accordance with Beyers' (2004) definition of voice strategy, namely that mainly simple information, and not technical, is being transmitted. Furthermore, Slow Food also attempted to mobilize the public by urging them to send letters and social media messages to their national governments, this in order to raise awareness among national decision-makers on the opinion of their citizens.

Entity	Access strategy	Voice strategy
Slow Food	Yes	Yes
Greenpeace European Unit	Yes	No

Table 6: Civil society interest groups' lobby strategies (Results based on data from interviews by Smeyers, Gerard, & Nikolic, 2016)

Slow Food and Greenpeace European Unit were also part of a coalition consisting of five more NGOs (Corporate Europe Observatory, European Environmental Bureau, Friends of the Earth Europe, IFOAM EU Group and Nature et Progrès Belgique) who approached the EU institutions on the topic of GMO cultivation. Thus, coalition building formed an important part of their overall lobby strategy, for Slow Food it was even the only channel through which they performed their lobby activities. Coalition building can make lobbying more effective for two main reasons: (1) strength in numbers and (2) pooling of resources (Dür and De Bièvre, 2007). Particularly, smaller players such as Slow Food can benefit from coalition building since they have fewer resources than larger players, such as Greenpeace European Unit.

One specific action of this coalition was a joint public letter send to all members of the European Parliament's ENVI Committee, urging them to grant member states and regions the right to ban GMOs on their territory (Corporate Europe Observatory, 2014). In the letter, they clearly disagreed with the Council's position, namely that this would give too much power to GMO businesses rather than protecting EU citizens and farmers. Alternatively, member states should be granted the right to ban GM crops on

their territory and to not let GMO businesses be more powerful than national governments. The coalition did support the European Parliament's position in their 2011 first reading.

3.2.2.2 Access points

Since both interviewed civil society interest groups stated that they used access strategies, their outreach to decision-makers, i.e. access points, can now be further analyzed. During the interviews, the interviewees were asked with which EU institution they had the most contacts and whether they also lobbied at the national level. Table 7 below gives an overview of the contacts that the interviewed civil society interest groups had with national and EU institutions.

Out of the three main EU institutions, the European Commission seems to be the most lobbied institution by civil society interest groups, with DG SANTE as the main target. While Slow Food initiated contacts with the European Commission, which resulted in direct meetings with DG SANTE, Greenpeace European Unit was actually approached by the European Commission in 2010 to attend three conferences on GMOs. However, the representative of Greenpeace European Unit argued that while the European Commission is open to meet, it is not always open to act (Smeyers, Gerard, & Nikolic, 2016). Remarkably, as has been noted before, both groups only had contact with the European Commission after the proposal on GMO cultivation was already published. Furthermore, DG GROW organized, in cooperation with DG AGRI and DG SANTE,

an ad hoc expert group to which Slow Food belonged, namely the High Level Forum for a Better Functioning Food Supply Chain (European Commission, 2016). Slow Food argued that it was important to be part of this expert group in order to meet officials of the European Commission who were involved with the GMO cultivation file.

Concerning the European Parliament, both interest groups stated that it was relatively easy to access because MEPs partly rely on the information given by NGOs. However, while ENVI Committee appeared to be very open towards contacts, AGRI Committee was not. One reason for this could be that since both Slow Food and Greenpeace European Unit frame GMOs as a risk to the environment, they would be able to achieve easier contacts with ENVI Committee, that focuses on environmental risks, compared to AGRI Committee, that focuses more on productivity and competitiveness (Smeyers, Gerard, & Nikolic, 2016). Slow Food had fewer direct contacts with MEPs than Greenpeace European Unit, since they were mainly represented through the coalition mentioned above.

When looking at the Council of the EU, only Greenpeace European Unit gained access to this institution through contacts with the Permanent Representations of seven member states. These member states were targeted simply because Greenpeace European Unit has offices there, thus practical reasons can influence the decision about who to lobby. While the representative of Greenpeace European Unit did not discuss

whether national governments were contacted, Slow Food’s representative highlighted the importance of contacting individual member states. Contacts were achieved through the attempts of Slow Food’s member organizations and remarkably also through the general public. Slow Food successfully managed to combine their access and voice activities by mobilizing the public in order to gain access to national ministries, such as in Italy.

Entity	Targeted EU institution (in order of importance)	Contacts with EC	Contacts with EP	Contacts with Council of EU	Contacts with individual member states
Slow Food	1. EC 2. EP	Technical with DG SANTE	Limited political with some MEPs	None	- Members approach national ministries - Urge public to contact their governments
Greenpeace European Unit	1. EC 2. Council 3. EP	Technical with DG SANTE	Political with ENVI Committee	Political with Permanent Representatives of France, Italy, Germany, Netherlands, Hungary, Luxembourg, Austria	None

Table 7: Access points of civil society interest groups (Results based on data from interviews by Smeyers, Gerard, & Nikolic, 2016)

3.2.2.3 Impact on GMO cultivation Directive?

At the end of the interview, both interviewee was asked whether they thought that their civil society interest group had an impact on the GMO cultivation Directive and whether were satisfied with the whole process and end result (Smeyers, Gerard, & Nikolic, 2016). As can be seen in Table 8 below, both interviewees thought that they only had a small impact on the final text of the Directive. Slow Food's representative argued that while the activities of NGO's might not have been crucial, they still were helpful in putting pressure on decision-makers due to successful voice strategies. Furthermore, while Slow Food was not satisfied with the final text of the Directive, they were pleased that numerous member states decided to opt out from GMO cultivation. Greenpeace European Unit was content with some of the European Parliament's amendments being incorporated (e.g. open-ended list of criteria on which member states can restrict or ban GMO cultivation), but they were unsatisfied with Article 114 related to the internal market being the legal basis of the Directive.

Entity	Impact	Level of satisfaction
Slow Food	Small	Medium due to weak proposal but most member states used right to opt out
Greenpeace European Unit	Small	Unsatisfied due to not being able to change treaty base

Table 8: Perceived impact on Directive and level of satisfaction of civil society interest groups (Results based on data from interviews by Smeyers, Gerard, & Nikolic, 2016)

To conclude this section on the lobby behavior of civil interest groups, it is hard to label these interests as either a winner or loser. Both Slow Food and Greenpeace European Unit do not consider themselves to be winners when it comes to the final text of the GMO cultivation Directive due to biotech companies having an important role in the first phase. However, the fact that several member states have opted out from GMO cultivation on their territory is seen as a win.

3.3 The framing of GMOs in the EU

Throughout the case study, it has been mentioned several times how important framing was for the debate on GMOs in the EU. As was argued in the literature review, framing is an important strategy for interest groups since it can lead to mobilization of people if they pick up the frame that you brought forward (Klüver, Mahoney & Opper, 2015). Business interest groups argued that the topic of GMOs should be seen in a scientific and economic light. Since the debate around GMOs is of a technical and scientific nature, only scientific arguments should be used. For example, business interest groups tried to promote GMOs by arguing they can help decrease worldwide food shortages. On the other hand, NGOs highlighted the possible environmental and health risks of GMOs, thus they focused more on emotional arguments. They also questioned the scientific arguments brought forward by businesses and whether there is really that much to economically gain from GMOs.

Thus, both sides – business and civil society interest groups – tried to frame GMOs in

a different way. When looking at the results of the 2010 Eurobarometer, it seems that the frame presented by NGOs was the one picked up by the general public (European Commission, 2010). Among EU citizens, there is an overall suspicion of GM foods and they do not see the benefits of GM foods. For example, 61% of Europeans do not agree that the development of GM food should be stimulated and 59% disagrees that GM food is safe for their health (European Commission, 2010). Thus, the general public in the EU believed that there are too much risks related to GMOs. Furthermore, 50% of Europeans do not agree that GM food would be beneficial for their economy and 53% does not believe that GMOs are safe for the environment (European Commission, 2010).

Therefore, it can be argued that business interest groups were unsuccessful in conveying their message to the general public, hence why the majority of these groups chose not to pursue voice strategies. They feel that there is no space for scientific arguments in the debate anymore due to it being so emotional and political and then it seems impossible to reframe the debate. Civil society groups, on the other hand, clearly influenced the public and were successful in framing the debate their way. The representative of Greenpeace European Unit even mentioned that the debate on GMOs is already so mature and in their favor, that they start pursuing access strategies now more than voice strategies. Additionally, based on the interviews and document analysis, it seems that the civil society interest groups had easier access to the European Parliament than the business interest groups. As Beyers (2004) argued that

the European Parliament is more sensitive to public opinion than the European Commission, the negativity around GMOs (e.g. negative public opinion and widespread frame of risky and dangerous GMOs) can explain why business interest groups had troubles gaining access to the European Parliament.

4. Final conclusion

The focus throughout this thesis has been on the lobby strategies of interest groups in the EU. For this thesis, lobbying was defined as the strategic provision of information by interest groups to public officials, with the goal of influencing outcomes in institutional arenas (Baron, 2010). Due to a personal interest in strategy, the following key research question was developed: “How do interest groups influence policy-makers?”. It has to be mentioned that the qualitative approach undertaken in this thesis primarily underlines discovery and exploration over confirmation, due to the limited amount of interviews conducted and the potentially biased data. A suggestion for future research would be to expand the research by adding more case studies on different topics, such as trade or the car industry, in order to make more conclusive generalizations.

Throughout the literature review, three important lobby strategies for interest groups were identified. These are access strategy, voice strategy and frame strategy (Beyers, 2004; Klüver; Mahoney & Opper, 2015) and they can coexist with each other. While access strategies are aimed at the venues where political bargaining takes place, voice strategies encompass activities that take place in different public spheres (Beyers, 2004). Thus, access strategies are more low profile strategies compared to voice strategies. Frame strategies are of a different kind and involve strategically emphasizing certain aspects of a policy proposal while simultaneously neglecting

others in order to push the debate in the direction interest groups prefer (Baumgartner & Mahoney, 2008). For this thesis, a case study of GMOs in the EU was chosen, with a particular focus on the GMO cultivation Directive. After analyzing the 15 semi-interviews and performing a document analysis, there were several important aspects about lobbying and lobby strategies that came to light in the case study and will now be further discussed.

First, regarding the first hypothesis on strategy choices, the analysis showed that business interest groups mainly used access strategies and largely targeted the European Commission. They based their activities on providing scientific and economic evidence in order to promote GMOs. Business interest groups abandoned voice strategies since they were proven useless due to the GMO debate being emotionally framed against them. However, they did still attempt to lobby institutions that are known for being more political in nature, such as the European Parliament, via their access strategy. Regarding the interviewed civil society groups, while they used both access and voice strategies, they changed their tactics when approaching different institutions. For example, Slow Food used its access strategy to provide information to European Commission officials in the expert group it was part of and it used its voice strategy to mobilize the public in order to gain access to national governments.

Secondly, regarding the second hypothesis on lobby targets, it seemed that due to the debate being so emotionally framed, most business interest groups opted to target the

European Commission since they believed that the technocrats would be more open towards the scientific and economic evidence that they could provide. This is in accordance with the theory provided in the literature review that states that specific interests have the expertise and relevant information to successfully target the European Commission (Gais & Walker, 1991; Kollman, 1998). However, for the civil society interest groups, known for being more diffuse interests representing broad parts of society, the European Commission was also the most targeted institution, with one civil society group even being contacted by the European Commission itself. This confirms Beyers' (2004) arguments that policy-makers attempt to diversify the supply of access in order to not become reliant on certain types of interest groups, which means that diffuse interests do have the opportunity to gain access to more technical institutions and use access strategies.

Thirdly, regarding the third hypothesis on framing, the case study on GMOs in the EU made it clear that framing did have a very important impact on the debate and lobby process. The debate was framed from the beginning as very emotional and political, not at all scientific and economic as business interest groups wanted. Business interest groups clearly failed to successfully use framing strategies, which also influenced their decision to not pursue voice strategies since it would most likely damage their public image even further. In contrast, civil society interest groups successfully used framing strategies and were able to mobilize the general public to lobby their politicians to urge them to ban GMOs in their daily life. For example, it seemed that the civil society

interest groups had easier access to the European Parliament than the business interest groups. As Beyers (2004) argued that the European Parliament is more sensitive to public opinion than the European Commission, the negativity around GMOs can explain why business interest groups faced difficulties gaining access to the European Parliament.

5. Annexes

5.1 Annex 1

In total, there were 15 semi-structured interviews conducted: 12 face-to-face, 2 via phone/Skype and 1 via email (Smeyers, Gerard, & Nikolic, 2016). Out of 15 interviews, 6 were with regional, national and EU institutions, 7 with business interest groups, and 2 with civil society interest groups. More details on the persons interviewed and the dates when the interviews took place can be found in the following table:

Nr.	Date	Entity/Person
1.	29/03/2016	EuropaBio/Pedro Narro, Public Affairs Manager
2.	30/03/2016	Hume Brophy/Claire MacCarrick, Account Director
3.	30/03/2016	Dow AgroSciences/Filip Cnudde, EU Government Affairs & Science Policy Leader
4.	12/04/2016	Slow Food/Marta Messa, Secretary
5.	13/04/2016	Greenpeace European Unit/Marco Contiero, Policy Adviser
6.	15/04/2016	EuropaBio/Beath Späth, Director

7.	15/04/2016	Permanent Representation (anonymous)
8.	21/04/2016	European Parliament/Marc Tarabella, MEP in AGRI Committee
9.	22/04/2016	FuturaGra/Fabio Niespolo, Government Relations
10.	22/04/2016	Baden-Wuerttemberg Representation/Winfried Schröder, Civil servant
11.	25/04/2016	European Parliament/Bart Staes, MEP in ENVI Committee
12.	28/04/2016	European Parliament/Tom Vandenkendelaere, MEP in ENVI Committee
13.	28/04/2016	European Commission/Pablo Pindado Carrion & Sirkku Heinimaa, DG SANTE
14.	28/04/2016	Copa Cogeca/Arnoud Petit, Director
15.	02/05/2016	Monsanto/Jonathan Ramsay, Head of Government & Industry Relations

5.2 Annex 2

Questionnaire for business interest groups (Smeyers, Gerard, & Nikolic, 2016)

- How did you represent interests of your clients/members on the issue of GMO cultivation? Did you use more voice (e.g. public relations and media) or access strategies (e.g. meetings with the policy makers)?
- With which EU institutions did you have the most contact on the issue of GMO cultivation? The Commission, Parliament or the Council of Ministers?
- Where you contacted by any of the aforementioned institutions so as to partake in the development of the GMO cultivation directive proposal? Did you take part in the work of Commission expert committees?
- With which DG did you have most contact? Were they opened for a meeting and willing to listen to your opinion on the issue?
- Were you able to reach the rapporteur (or other members of the Standing Committee) on the issue of GMO cultivation directive? If so, would you say that reaching them was more difficult than reaching Commission?
- Did you have any contacts with the Council of Ministers? Was representation of interests of your clients/members in the Council part of your strategy on the GMO cultivation directive?
- What about the national level? Did you have any contact with the national governments throughout the adoption process of the GMO cultivation directive?
- What were the biggest obstacles that you have encountered during the process of adoption of the GMO cultivation directive?
- Do you think that you have successfully represented interests (e.g. exerted influence) of your clients/members? Can you, please, elaborate the reasons for your opinion?
- Were your clients/members satisfied in general with the way you have represented their interests on the issue of GMO cultivation?
- Do you have anything else to add or is there anything else you would like to share with us?

Questionnaire for civil society interest groups (Smeyers, Gerard, & Nikolic, 2016)

- How did you represent your interests on the issue of GMO cultivation? Did you use more voice (e.g. public relations and media) or access strategies (e.g. meetings with the policy makers)?
- Did you form a coalition with other NGOs? Can you elaborate on the joint letter between several NGOs (including yours) send to MEP Frédérique Ries?
- With which EU institutions did you have the most contact on the issue of GMO cultivation? The Commission, Parliament or the Council of Ministers?

- Were you contacted by any of the aforementioned institutions so as to partake in the development of the GMO cultivation directive proposal? Did you take part in the work of Commission expert committees?
- With which DG did you have most contact? Were they available for a meeting and willing to listen to your opinion on the issue?
- Were you able to reach the rapporteur (or other members of the Standing Committee) on the issue of GMO cultivation directive? If so, would you say that reaching them was more difficult than reaching the Commission?
- Did you have any contacts with the Council of Ministers? Was representation of interests in the Council part of your strategy on the GMO cultivation directive?
- What about the national level? Did you have any contact with the national governments throughout the adoption process of the GMO cultivation directive?
- What were the biggest obstacles that you have encountered during the process of adoption of the GMO cultivation directive?
- Do you think that you have successfully represented your interests (e.g. exerted influence) and were you satisfied in general with how you approached it? Can you, please, elaborate the reasons for your opinion?
- Do you have anything else to add or is there anything else you would like to share with us?

Questionnaire for European institutions (Smeyers, Gerard, & Nikolic, 2016)

General

- Can you explain your personal role in the development of directive 2015/412 related to the prohibition of the cultivation of GMOs by member states?
- What were the main differences between Parliament, the Council and the Commission on the GMO cultivation proposal?
- Did you have the feeling that certain stakeholders were more involved in representing their interests than others?
- Was there contact with the European Parliament during the process? If yes, did they affect the adaptation of directive 2015/412 and how? Who did you have the most contact with in the European Parliament?
- How strong was the intensity of contact with the Council? Were you satisfied with the development of the negotiations? Were certain Member States more interested in the debate than others?

- Were trilogues important in reaching a compromise between the Council and the Parliament? Did the Commission try to unlock the situation? If yes, can you specify how you have tried to facilitate a consensus?
- What were the biggest obstacles that you have encountered during the adoption process of the directive?
- How important was the choice of treaty base (from article 192 to article 114) for the adaptation process of the directive?
- Are you satisfied with the final draft of the directive? Did you have the feeling that certain actors influenced the text more than others?
- Did you have a feeling that the different stakeholders (e.g. business groups, NGO's) were (un)pleased with the new directive?
- Do you have anything else to add or is there anything else you would like to share with us?

Specific

- Why did the Commission decide to develop a proposal on GMO cultivation? Could you explain the Commission's motivation?
- Were other DG's also involved in the development of the directive?
- Did you have contact with different stakeholders before you developed and announced the proposal? If yes, can you specify which stakeholders and if you were the one to reach them or if it was the other way around? If yes, can you also give the main reasons why you had these contacts?
- The Netherlands has proposed its own solution to the common problem before the Commission announced theirs, did this influence the proposal of the Commission?
- Was there a line to take created by your political group? If yes, can you clarify this line? Moreover, did members follow this line?
- Did you have the feeling that national interests played a role in determining the position of the different MEPs in your political group?
- Were there coalitions formed between political groups in the European Parliament?
- The position of Belgian in the debate around directive 2015/412 was unclear due to differences between Flanders and Wallonia. Were these differences also present in the Parliament? If yes, could you also explain where these differences come from?
- Did you or your political group have contact with different stakeholders during the adaptation of this directive? If yes, can you specify which stakeholders and if you

were the one to reach them or if it was the other way around? If yes, can you also give the main reasons why you had these contacts?

- In general, how would you describe the intensity of contacts with stakeholders related to GMO's?
- Do you observe a difference in how (strong) different groups (e.g. business groups or NGO's) contact you? Do you have the feeling this is the same for MEP from different political groups?

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