Sleeping in the storm

How the European Commission does not adjust its communication strategy to politicization

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Abstract

The European Commission needs to craft a reputation of being legitimate. For this, it articulates to represent the interests of stakeholders such as citizens and businesses. This can be referred to as 'legitimacy claims': mentions of stakeholders with the goal of signaling that these form a source of legitimacy. In times of increasing politicization, a key question is whether and how the Commission adjusts its communication strategy. With this thesis, I test whether politicization has an effect on the number of legitimacy claims towards citizens and businesses. Using a quantitative text analysis of Commission press releases between 1997 and 2009, I gathered monthly data on legitimacy claims. I built two time series models (ARIMAX) and included politicization and the orientation of Commissioners as independent variables. Results show that the Commission did not adjust its communication strategy towards citizens and businesses in light of politicization. The share of press releases in a month that quoted Commissioners holding citizen-oriented portfolios did not significantly affect the number of legitimacy claims directed at citizens. These findings suggest that, despite the growing body of literature emphasizing the effects of politicization, legitimacy claim dynamics may be relatively stable over time.

1. Introduction

The legitimacy of the European Union, and therefore institutions such as the European Commission (hereafter: EC), is deeply contested. Finding itself in times of increased political turbulence, the EC continuously faces questions over its legitimacy. The importance of legitimacy is immense: legitimacy is necessary to remain relevant, to have legislative proposals accepted and to secure compliance with these laws. On top of this, it would be normatively problematic to have an institution decide over people who do not see it as legitimate, according to Tallberg and Zürn (2017). For a competence-seeking EC, it is rational to seek the support of its stakeholders (Rauh, 2016). For this, it needs a reputation of being legitimate (Bunea, 2018). This involves, by nature, claims to legitimacy (Black, 2008), promoting *"the idea that the exercise of power is normatively acceptable and for that reason voluntarily accepted"* (Tsakatika, 2005, p.193). These claims are *"made by virtually every state in the modern era"* (Gilley, 2009, p.10) but become even more relevant in times of politicization.

Two main types of stakeholders can be distinguished for the EC: 1. businesses and 2. citizens (Metz, 2013). The support of these actors can be seen as vital legitimacy sources of the EC (Thiel, 2014). The EC tries to paint a picture in which it represents the interests of these stakeholders, and thus taps from these actor's legitimacy sources. When proposing a new law or policy, the EC generally offers extensive justifying arguments to the media, in order to substantiate the necessity of the proposal. Claims to legitimacy can be traced in the press releases about these proposals that the EC issues. Take, for example, the particular press release on amendments on the directive on distance selling, which states that *"These proposals will benefit not only the consumers but also trade, industry and the distributors by increasing consumer confidence, which is already high, and fueling expansion of their activities."*[1] By referring to these actors, such as consumers and industry in this case, the EC claims to represent these constituencies, and as such taps the sources of legitimacy that they form.

The positions and thus the relevance of the stakeholders in relation to the EC are not constant, but likely to fluctuate depending on larger dynamics in society. This is not merely a matter of power: stakeholders can become very powerful but, nonetheless, prove to be poor sources of legitimacy for an institution's reputation. Sources of legitimacy are complex, interlinked and often contradictory to each other (von Soest & Grauvogel, 2015). This leads to the issue of how the EC weighs the main sources of legitimacy against each other, and how responsive its self-legitimation strategy has been to political and societal shifts.

One of the major trends in the EU polity in the last decades is politicization (Hutter & Grande, 2014; Rauh, 2016). For a long time, the legitimacy of the EC was considered to rely mostly on its technocratic and impartial character. However, a fierce debate on the so-called democratic deficit of the European Union (Follesdal & Hix, 2006) entered scientific and public discourse in the 1990s, while public support for the EU dropped (Braun & Tausendpfund, 2014). This has also been labeled the legitimacy crisis (Schneider, 2019). As a result, EU institutions operate in an increasingly politicized context (Hooghe & Marks, 2009) with higher levels of polarization, more visible politics and broader audiences that pay attention to what the EU does (de Wilde, Leupold, & Schmidtke, 2016). While, like any institution, legitimation

[1] The Commission adopts a draft directive and a draft recommendation on "distance selling". Date: 08-04-1992.

efforts have always been part of the EC job, politicization means that it may see the need to re-balance its various sources of legitimacy. Already, extensive research has been conducted on how the EC responds to this challenge. Researchers found that the EC increasingly attended to citizen interests during policy-making processes (Bunea, 2018; Rauh, 2019). Additionally, EU elites make legitimating statements more often in response to politicized legislative proposals (De Bruycker, 2017). With scarce longitudinal research available, however, it remains speculative whether and how the EC modifies its legitimacy claims in light of the politicization in the long run.

This thesis investigates the following research question: *How does politicization affect the legitimacy claims the European Commission makes?* By answering this question, this paper contributes to scholarly research into the patterns of strategic legitimacy claims in the context of the European Union.

This study combines existing data on the politicization of the EU (Rauh, 2016) with new textual data retrieved from the online press release database of the EC. Press releases are representative of the full communication strategy of the EC, and thus form an excellent source to answer the research question. To find the press releases that present new proposals for a Directive or Regulation, I applied a partly automatic, partly manual selection process. From these press releases, I distilled the number of legitimacy claims, operationalized as references to the principal stakeholders of the EC. This led to a legitimacy claims score for each stakeholder per month from 1997 up to and including 2009. Subsequently, I tested for the effect of politicization on these scores by making use of an autoregressive integrated moving average with exogenous variables (hereafter: ARIMAX) methodology. This method is especially suitable for including independent variables in time series analysis (Andrews, Dean, Swain, & Cole, 2013). Data for legitimacy claims towards both stakeholders may be independent from each other. Therefore, I carried out two fully separate analyses. For both analyses, variables were included on the extent to which Commissioners that were cited in a month held business –or citizen-oriented portfolios.

The results suggest that the communication of the EC has not been adjusted in light of politicization. This is striking: increased politicization has often been argued to entail stronger incentives towards supranational institutions to follow a more public-friendly course (Zürn, 2014). Has the EC remained asleep while the storms of politicization were growing? These results carry relevant implications for future research on the long-term communicative responsiveness of the EC, and the consequences of politicization on patterns of legitimation in the EU.

In the following sections, I will first describe the current state of research on this topic. Subsequently, I draw a picture of my own theoretical framework on constructing legitimacy, in light of existing scholarly debate. Next, I report on the intended strategy of inquiry: I applied an extensive procedure of qualitative and quantitative inspections and tests to arrive at the optimal ARIMAX models for both analyses. Afterward, I present the results and draw conclusions.

2. Current state of the literature

Studies of legitimacy can be classified in three branches: those approaching the concept from a normative perspective (how legitimate is the EU?), from a bottom-up perspective (what do people think of the legitimacy of the EU?) and those from a top-down perspective (how do EU institutions claim legitimacy?). With a focus on the political communication of the EC, I position this thesis in the top-down perspective. By making clear what this top-down perspective entails, in contrast to the other two branches, I show how the theoretical framework in chapter three is embedded in the larger body of literature.

2.1 Normative perspective

The first, normative perspective evaluates the EU in light of the various forms of legitimacy. It is involved in discussing the standards by which EU legitimacy should be rated, evaluating the current situation at hand and proposing ways to improve the EU guided by these standards.

Traditionally, the normative branch of the scholarly literature on democratic legitimacy has long been dominated by the taxonomy that distinguishes input legitimacy from output legitimacy. Originally coined by Scharpf (1999), these concepts delineated the difference between legitimacy that rests on the quality of the process (input) and of the outcomes (output). Input legitimacy refers to the democratic character of the process. Examples of input legitimacy sources are broad political participation by citizens and the support of a democratically elected majority. In the EU, the European Parliament (hereafter: EP) and national elections are perhaps the most visible source of input legitimization. On the other hand, there is the concept of output legitimacy, which rests on the capability of an institution to govern effectively. It refers to performance in meeting policy goals and solving problems.

Horeth (1999) argued that, alongside these two sources of legitimacy, the member states form the third source. Because the member states sign the major EU treaties, they provide legitimacy to the EU. Building upon this, he argued that these three main sources of legitimacy exist in tension with each other. He stated that *“proposals for institutional reform in the EU which target any of the three sources of legitimacy tend to weaken another”* (Horeth, 1999, p.258). Importantly, this model treats actors and qualities of governance as comparable sources of legitimacy.

Instead of democratic legitimacy strictly building upon the member states, Schmidt (2013) proposed to include another third concept, next to input and output legitimacy: ‘throughput legitimacy’, a more process-oriented conceptualization of legitimacy types. Throughput legitimacy can be judged in terms of transparency and accountability (Schmidt, 2013). This taxonomy echoes the famous words by Abraham Lincoln: input legitimacy rests on governing *by* the people, output legitimacy on governing *for* the people and throughput legitimacy on governing *of* the people (Schmidt, 2013).

All of these types of legitimacy can be recognized within the debate on the democratic qualities of the EU. Concerns about the so-called ‘democratic deficit (Follesdal & Hix, 2006) led to the ‘normative turn’ (Bellamy & Castiglione, 2003) in EU studies, focusing on the standards of legitimacy that should be applied, and how this should take place. On the one hand, some theorists pointed out that there is no real democratic deficit to the European

Union. Majone argued that decision-making on EU-level does not need to be majoritan in nature, that is, citizens do not need to have direct democratic influence: *"as long as the tasks assigned to this level are precisely and narrowly defined, non-majoritarian sources of legitimacy – expertise, procedural rationality, transparency, accountability by results – should be sufficient to justify the delegation of the necessary powers"* (Majone, 1994, p.28). Majone believes that politicization of the EU would do its legitimacy no good as a less consensus-oriented political culture would lead to policies with clear winners and losers, instead of being to some benefit to all. To counter the 'credibility crisis' it faces, the EP should keep focusing on its task of scrutinizing the EC to improve its policies, without aiming to move it beyond the demands of the member states. In other words, the legitimacy of the EU should rest on the quality and scope of its output. Moravscik adds to the same school of thought by stating that the EU is democratically legitimate because it specializes in *"those functions of modern democratic governance that tend to involve less direct political participation"* (Moravcsik, 2002, p.606). While he was less enthusiastic than Majone about technocratic rule, and how it would benefit everyone in the EU, he still believed that there is no serious democratic deficit to the EU, precisely because the member states agree to transfer competencies and keep the EU institutions at bay. Because the member state governments are democratically elected and held accountable by their respective electorates, the EU remains legitimized through these member states. In this 'liberal-intergovernmental view' (Moravcsik, 2002), the EC is mainly an agent of the governments. As such, he resembles the threefold taxonomy of types of legitimacy that Horeth (1999) designed later on.

Their relatively optimistic positions were opposed by multiple other scholars, most notably Follesdal & Hix (2006). According to them, the EU and its institutions lack major aspects of a full-blown, democratic political contestation. The leadership of the EU cannot be thrown out by voters when ill-performing in the electorate's eyes. What is more, the EU was argued to be highly in-transparent, thus hampering academics', media's and most notably voter's insight into the political behavior of the EC and EP. As such, citizens are not offered a fair chance of expressing their will through informed votes, and the input legitimacy of the EU is seriously flawed. Follesdal and Hix (2006) called for the enhancement of an European-level democracy and the fostering of political contestation. They proposed to *"increase transparency of the legislative process, increase the powers of the European Parliament and formally link the choice of the Commission President to European elections."* (Follesdal & Hix, 2006, p.555). They acknowledged that this might come at a cost of quality and efficiency of agreements. Nonetheless, they stated that this *"loss of efficiency in individual cases does not outweigh the benefits of political contestation and more trustworthy institutions"* (Follesdal & Hix, 2006, p.555). In other words, they are willing to trade output legitimacy in favor of input legitimacy.

2.2 Bottom-up perspective

The second branch of literature on legitimacy, bottom-up, tends to focus on the perceptions of the legitimacy of the EU and its institutions amongst the wider public. This is grounded in the fundamental belief that legitimacy rests on public support: *"a polity can function effectively in the long run only if publics support it. Without such support, it is hard to imagine how a system can be considered legitimate"* (Loveless & Rohrschneider, 2011, p.7). Along with the growing awareness of the relevance of public opinion to the EU's legitimacy, substantive research has been carried out in this direction. Thus, this branch of literature moves beyond the question of how citizen's support should be evaluated in light of the legitimacy of the EU, and instead looks at what people actually think of the EU. The most notable example of this research is the ongoing polling directed by the EC itself: the Eurobarometer, one of the most well-known sources of information on the opinions of citizens on the EU. Between 1970 and 2014, the number of Eurobarometer surveys on special, topical issues has dramatically increased. The results of these surveys can in itself be viewed as part of the competition over policy competences between member states and the EC (Haverland, de Ruiter, & Van de Walle, 2018).

On top of this, a plethora of academic research has been carried out in this branch of research. It is now widely agreed upon that permissive consensus has been traded for constraining dissensus with regard to the European integration (Hooghe & Marks, 2009). Boomgaarden et al. (2011) concluded as follows: *"the legitimacy of European decisions, as expressed by citizens, is not static over time, nor does it apply across the board to different types of policy areas"* (Boomgaarden, Schuck, Elenbaas, & de Vreese, 2011, p.243). This conclusion is echoed by findings that demonstrated how citizen evaluations of the EU fluctuate over time, for example as a consequence of the financial crisis (Braun & Tausendpfund, 2014). What is more, the issue of European integration has become more and more disputed amongst citizens (Rauh, 2016). The public opinion on the legitimacy of the EC plays a fundamental role in the context of democratic governance in the EU and is far from being constant over time.

2.3 Top-down perspective

Lastly, there is a branch of research that investigates elite responses towards questions of legitimacy. It is within this branch that I locate this thesis. Institutions and political elites actively legitimize themselves and try to 'sell' their position towards the public and other relevant actors (Barker, 2001). In his seminal publication, Saward (2010) argued in favor of *"seeing representation in terms of claims to be representative by a variety of political actors"* (p.298). In this line of thinking, the performative side of representation is stressed, rather than seeing it as a static given or a pure product of mass opinions. Two main questions on the effects of politicization on patterns of legitimation can be distinguished in the literature. One is 'how does the EC shape its legitimation: discursively, with rhetorical measures, or behaviorally, with policies?' (Tallberg & Zürn, 2017). The other one is 'who is claimed to be represented?'.

Tsakatika departs from the normative debate by distinguishing two sets of claims: the traditional set of claims that focusses on efficiency and neutrality, and a newer set that refers to diversity and a more democratic character (Tsakatika, 2005). The EC is permanently trapped between these two sets of claims. If the EC tries to meet the demands of Member States, it has to stick to the first set of claims. In contrast, if the EC is to meet emerging political forces such as consumer NGO's, it has to adopt a more political position, in line with the second set of claims. Tsakatika studied the EC White Paper on Governance from 2001 with the goal of finding out what choice the EC intended to make. This milestone document described the grand strategy of the EC at that time to navigate these contrasting claims. She found that the EC tried to convey the message of reconciling both sets of claims and enhancing civil society participation. A careful reader, however, could notice that in the end, it sided mostly with the first set of claims. Tsakatika even states that, in the White Paper, *"The principle of participation is clearly prey to efficiency"* (Tsakatika, 2005, p.211). In other words, the EC saw politicization relevant enough to respond to but did not embark on a new course.

The White Paper also proposed more online consultations, to reach out to civil society. These consultations were studied by Quittkat (2011), who found that indeed, an effort was made to increase the frequency of online consultations in the aftermath of the White Paper. Strikingly, business interests were highly overrepresented in the participation in these online consultations.

Research on attitudes of within the EC, mainly building on 21 in-depth interviews with Dutch EC officials, shows that the institutional role conceptions of these officials are affected by politicization: *"Concerns about the legitimacy of their organization induce Commission officials to reconsider their attitudes towards the role of their institution in EU policy-making"* (Bes, 2017, p.22). Responding to politicization, EC officials developed their role conceptions towards a more pragmatic middle ground between supra-nationalism and state-centered governance. Quantitative research confirmed this finding: the views of EC officials on their own organization were indeed affected by Euroscepticism and EU salience in their home country. Thus, it can be concluded that EC officials are well aware of the concerns over the legitimacy of the EC amongst citizens.

Paradoxically, however, Bes (2017) found that the behavior of the EC in policy processes was not so much affected by politicization. An investigation of the negotiations on a politicized trade agreement (TTIP) and a non-politicized one (EU-Japan) showed that while higher politicization did lead to a more transparent mode of working, the EC did not give in to member state demands for more control. Thus, Bes detected an interesting paradox: attitudes were adjusted in light of politicization, but policy-making hardly. Rauh (2016) concluded otherwise. He conducted research on consumer policies of the EC in light of increased politicization. In this field of policies, the EC must balance between clearly diverging interests: on the one hand, there is the diffuse mass of consumers, on the other hand, there are the concentrated interests of the producers. He analyzed 17 policy drafting processes between 1999 and 2008. Based on this study, and more research, he concluded that the EC responded to times of higher public attention with more consumer protection, while lower public attention led to more industry-friendly policies.

A longitudinal study on the effects of public opinion on the number of directives and regulations issued by the EC found significant effects for this relationship (Williams & Bevan, 2019). With a time series of Eurobarometer results on how positive people are about European integration and the number of laws issued between 1974 and 2008, the authors found that the EC increased the unilateral legal act adoption in times of negative public attitudes, and decreased unilateral legal act adoption when there were higher levels of Europhilia.

Bunea (2018) studied the proposal for an extension of the EU Transparency Register (hereafter: TR), which regulates the position of interest groups in the EU. According to this study, the EC faced the choice of which stakeholders would be given most influence on the TR proposal. On the one hand, the EC could aim at improving its input legitimacy by attending to the demands of the general public. On the other hand, the EC could try to enhance its reputation of output legitimacy by signaling that it is listening to expert informants. The final proposal included stronger enforcement mechanisms and a higher level of transparency, congruent with public demands. Hence, Bunea concluded that the EC mainly turned to improve its input legitimacy, that is, attending to the public for more legitimacy. As such, the EC operated as an adaptive, strategic 'legitimacy maximizer' (p.17), striving for a reputation of responsiveness towards public preferences. Based on this, the author formulated the expectation that *"stakeholders representing public interests are now likely to become the Commission's foremost allies on initiatives marked by high levels of politicization and interinstitutional conflict"* (Bunea, 2018, p.18). Situated in a politicized context, an adaptive EC responds by attending more to citizens and less to corporate interests.

Surrounding the policy-making process, various involved actors forward preferences in the public arena. Politicization is likely to affect this. De Bruycker (2017) hypothesized that *"politicization of EU policy processes stimulates elites to articulate public interests"* (p.603). This study focused on the public debate over policy issues. To do so, he sampled a set of 125 legislative proposals (directives and regulations) issued between 2008 and 2010. Through an online search in the archives of six media outlets, 2164 statements by political elites about these legislative proposals were collected. These statements were coded in, amongst others, terms of the communicating actor and whether or not it contained an appeal to public interests. Whether or not the latter was the case was included as the dependent variable, and politicization of the proposal as one of the independent variables for the multiple regression analysis. Results of this study proved that there was indeed a significant relation: the higher the level of politicization of an issue, the more often EU elites would address public interests related to this issue in the media. The number of business lobbyists, however, had a negative effect on this relation, just as the EC would be somewhat less prone to articulate public interests compared to the EP. Controlling for whether a statement was made in election time showed that this did not matter.
Speeches are a way of visibly conveying a message on a certain policy that can be influenced by the politicization trend, too. In a study on speeches in times of the Euro crisis, researchers found that Commissioners responded to skeptical public opinion and low levels of partisan Euroscepticism by increasingly defending European integration (Rauh, Bes, & Schoonvelde, 2018).

2.4 Position of this study

The ongoing normative debate over the legitimacy of the EC demonstrates the intrinsic relevance of questions concerning the patterns of legitimacy claims. It becomes clear that legitimacy, as seen from the point of view of citizens, is not constant over time, but prone to fluctuations and trends. The normative, scholarly debate mirrors the given that, in public opinion, a permissive consensus has shifted towards a constraining dissensus. These stronger legitimacy demands cannot be seen apart from the politicization trend. Hence, this research departs from the view that the legitimacy crisis is too severe for the EC to ignore. EC officials are well aware of the fact that the EC needs to respond. The EC can choose between different sets of legitimacy claims to do so. It is important to note here that legitimacy claiming is, in practice, not only a matter of adhering to value sets but also of attending to stakeholders. Stakeholders may perceive an institution to be legitimate not only if it aligns with their values or if they cognitively perceive it to be inevitable, but also if they believe that the institution serves their interests (Black, 2008). The EC has to balance its claims of legitimacy vis-á-vis its principal stakeholders and can decide to re-balance in light of politicization. Research has found that the EC responds to politicization with a rhetorical turn to the citizen (De Bruycker, 2017), although this does not always happen whole-heartedly (Tsakatika, 2005). Some scholars found that the EC adjusted policies as well

(Bunea, 2018; Rauh, 2019), but this sometimes leads to an overrepresentation of corporate interests compared to public interests (Quittkat, 2011) and has been contested by other findings (Bes, 2017).

Discursive legitimation has been theorized to vary on three dimensions: 1. intensity, the number of legitimation actions, 2. tone, the direction of these legitimation acts, and 3. narratives, patterns in the standards of justification (Tallberg & Zürn, 2017). With this thesis, I study the discursive legitimation of the EC and especially zoom in on the intensity of EC legitimacy claims, by looking at the number of claims towards citizens and businesses. Legitimacy claims as I define them appeal to the interests of stakeholders. Therefore, I place this research firmly in the top-down literature. The literature so far points in the direction that the EC does adjust these practices of claiming legitimacy to the trend of politicization. To my knowledge, there has been some longitudinal research on the effect of public opinion on policy-making behavior of the EC (Williams & Bevan, 2019) and some research on the relation between politicization of issues and communication of EU elites (De Bruycker, 2017). Yet, I found no empirical research combining a time series on public opinion (or politicization) and discursive legitimation on stakeholders of the EC. This is the gap in the literature that this thesis seeks to fill.

3. Theoretical framework

In the following section, I will describe the theoretical framework of this thesis and the accompanying hypotheses. First, I will discuss a series of basic assumptions that guide this thesis: 1. that the EC is a rational, competence-seeking actor, 2. that it depends on its environment for crucial resources, 3. that the EC strives for a reputation of legitimacy, 4. that it operates in one, supranational theatre with the media as primary means of communication towards its major stakeholders, businesses and citizens. Subsequently, I will explain the concept of 'legitimacy claims' and argue that politicization alters the legitimacy claiming dynamics of the EC. This leads to the hypothesized theoretical model.

3.1 Rationalism

The first major assumption that guides this thesis originates in the rationalist body of literature on European Governance (Pollack, 2003). This describes the EC as a strategically calculating actor that strives for the fulfillment of its own interests. In other words, the EC is a 'competence-seeking actor' (Pollack, 2003). This assumption greatly simplifies the internal dynamics of the EC: individuals within it might hold heterogeneous attitudes and preferences (Bes, 2017). Research shows, however, that rational calculations on costs and benefits explain EC official's attitudes on their organizational environment quite well (Bauer, 2012). Rauh (2016) claimed that EC officials on usually hold a mild preference for *"at least retaining the current supranational competences of the organization they work in – be it for competence-seeking, problem-solving or even ideological motives"* (Rauh, 2016, p.26). In line with this, I assume that the EC is a rational, competence-seeking actor.

3.2 Environment-dependency

As such, I arrive at the second major assumption of this thesis, which originates in the view that organizations operate as open systems (Brunsson, 1986; DiMaggio & Powell, 1983; Meyer & Rowan, 1977; Salancik & Pfeffer, 1978). This body of literature emphasizes that organizations are dependent on their environment for crucial resources. Hence, organizations adjust organizational structures to their environment (Scott, 1981). In other words: *"organizations need resources to survive; but because they are not internally self-sufficient, they require resources from their environment"* (Metz, 2013, p.269). Two levels can be distinguished for the need for resources from the environment. *Firstly*, on a practical level, organizations such as the EC need the information and resources of their environment in order to function well (Metz, 2013; Salancik & Pfeffer, 1978). *Secondly*, organizations depend on their environment for legitimacy, a resource that is especially crucial for public organizations (DiMaggio & Powell, 1983; Meyer & Rowan, 1977). The point on the second level means that an organization will be influenced by *"public opinion [and] the views of important constituents"* (Meyer & Rowan, 1977, p.343). This ties in with the view that legitimacy fundamentally rests on the acceptance by significant others (Black, 2008). Constructing legitimacy is a matter of interaction: the actor claims legitimacy and constructs it in a dialectical, interactive process with other actors (von Soest & Grauvogel, 2015). Following Rauh (2016) I refer to these environment organizations, important constituents or significant others as the stakeholders of the EC.

3.3 Reputation

From the previously described assumptions, it follows that the EC has a stake in staying legitimate in the eyes of its stakeholders. As individuals and institutions have to base their judgment on scarce information, they turn to an organization's reputation. Organizational reputation has been defined as *"a set of beliefs about an organization's capacities, intentions, history, and mission that are embedded in a network of multiple audiences"* (Carpenter & Krause, 2012, p.26). Thus, whether these stakeholders consider the EC to be legitimate is not a neutral given, but highly dependent on the EC's reputation. Public administrators attempt to cultivate the reputation of their institution because it may shield them from external threats to their autonomy and room for decision and secure them against the opposition. In other words, the EC continuously strives for a better reputation. For these reasons, the EC administration seeks to convey the message that its stakeholders are being served well (Rauh, 2016). As such, it draws upon justificatory resources to secure its reputation of legitimacy (Hurrelmann, Gora, & Wagner, 2013). It does so in the particular context of the European Union.

3.4 The European demos

The European demos is a particular one. While the previous assumptions focus on goals, character, and behavior of the EC, the following three points discuss the context of the EC.

3.4.1 One theater

With this assumption, I assert that the EC strategically operates in a 'unified' context. Regardless of the fact that borders and language barriers still exist, stakeholders and the EC share a supranational discourse. Some scholarly debate has been held on the formation or absence of one, EU-wide public sphere. On the one hand, member states have been shown to differ greatly as to the extent of politicization (Hutter & Grande, 2014; Hoeglinger, 2016). Moreover, some research indicates that EC officials are most affected by domestic debates in their country of origin (Bes, 2017). Commission officials were found to follow these national opinion trends closely and respond to it with adjusting their reputation management. On the other hand, the politicization of EU affairs has often been related to the ongoing trend of the delegation of tasks to EU-wide institutions and by that the expansion of supranational competences (Rauh, 2016). This points in the direction of the formation of an European demos, and could imply that EU politicization can best be viewed as transgressing national borders. Indeed, research has found that debates over the legitimacy of the EU were remarkably similar in different nation-states (Hurrelmann et al., 2013). This assumption is important: precisely because EC officials believe that their signals will be received and debated upon by its stakeholders across the whole EU, it can be expected that it adjusts its communication towards supranational trends.

3.4.2 Media

Within this European demos, discourses on the legitimacy of the EC are shaped in multiple arenas. From the private dinner table to the national parliaments, the debate takes place in many instances. The mass media, however, serve as the most apparent and influential constitutors of the public sphere (Hurrelmann, Krell-Laluhová, Nullmeier, Schneider, & Wiesner, 2009; Koopmans, 2007). Most citizens and companies look at the media as their prime suppliers of information and interpretation. *"The media of Western democracies also serve as the primary interface – or gatekeeper – between citizens and the representatives of political systems; media debates on political issues juxtapose the self-legitimating claims of these elites and the legitimacy assessments of important stakeholders or professional observers"* (Hurrelmann et al., 2009, p.487). Via the media, political elites communicate towards their stakeholders (Aelst & Walgrave, 2016). As such, it is likely that the EC tries to influence legitimacy discourses in the media with its own legitimacy claims.

3.4.3 Stakeholders

I define stakeholders in line with the definition of Freeman (1984, p.5): *"a stakeholder in an organization is (by its definition) any group or individual who can affect or is affected by the achievement of the organization's objective".* In light of this definition, two of the principle stakeholders of the EC are citizens and businesses. In the literature, these have often been categorized as dialectically opposing stakeholders (Dür, Bernhagen, & Marshall, 2015; Schmidt, 2014). This is especially the case on market regulation issues, which falls in the sphere of influence of the EC. On the one hand, there are the diffuse, public preferences of citizens (De Bruycker, 2017). On the other hand, there are more narrow, corporate interests. The financial crisis in 2014 revealed that markets and people can have highly diverging interests. This meant that, in general, businesses demanded government-funded stability, whereas the people asked for more social benefits (Rauh, 2016; Schmidt, 2014). Other examples of issues in which the dividing line often stands between businesses and citizens are health, environmental protection, consumer interests and labor rights (Dür et al., 2015). The EC faces the task of cultivating the belief that the EC serves the interests of both stakeholders, in order to be seen as legitimate in their eyes.

Other stakeholders can be distinguished as well, such as member states and local authorities (Bunea, 2018; Rauh, 2019). These are, however, beyond the scope of this research for methodological reasons. As such, I focus on businesses and citizens. I will later, in sections 3.6.1 and 3.6.2, elaborate on how their positions as sources of legitimacy to the EC may have changed in light of politicization.

3.4.4 The EC as agenda setter

All of the previously discussed assumptions become especially visible when the EC engages in its core activity: proposing new regulation. The EC holds a position in which it initiates a large share of the EU's legislative output, and has a stake in ensuring that it keeps on doing so. Proposing new legislation is a way of promoting its position in relation to other EU institutions, in other words: of remaining relevant (Dür et al., 2015; Tallberg & Zürn, 2017). What is more, within the EC, Commissioners and their DG's compete over crucial resources. A way of remaining relevant, and thus optimizing the access to these resources, is to bring forward a steady flow of proposals for new directives and regulations. As a consequence, the competence seeking behavior of the EC is predominantly a matter of proposing new laws.

There are two reasons why, when proposing new law, the EC is incentivized to signal responsiveness towards businesses and citizens. *First*, while most policy outcomes in the EU are the result of complex bargaining, the proposal makes it very clear to observing stakeholders in what way it acts in the stakeholder's interests. Thus, *"in situations where attribution of responsibility is difficult, public commitments to responsive positions may function as credible signals of responsiveness"* (Schneider, 2019, p.3). The easy attribution of credit or blame in the proposal phase of the policy process creates momentum for signaling a policy stance favorable towards stakeholders. *Second*, the EC tries to have as many proposals accepted and implemented as possible. For this, it will need institutional consent: usually, it cannot pass legislation without the support of the Member States and the EP. The latter actors also strive for societal support and can be expected to *"to take a position on a legislative proposal that maximizes support and minimizes opposition by societal actors"* (Dür et al., 2015, p.957). If the EC does not communicate that the interests of the societal stakeholders are taken care of, the Member States and EP might doubt whether this is the case, and thus be less inclined to support the proposal. What is more, if the proposal is accepted, but Member States believe the EC to be not legitimate in the eyes of the public, they might delay or refuse implementation (Williams & Bevan, 2019). This incentivizes the EC to strive for a reputation of being legitimate, especially when it seeks approval of its legislative proposals.

3.5 Legitimacy claims

Combining the assumptions leads to the conclusion that the EC will communicate strategically via the media to maintain its reputation of legitimacy in the eyes of its main stakeholders: citizens and businesses. Civil servants employed by the EC are well aware of the fact that they are being monitored by the stakeholders of the EC (Bes, 2017). These stakeholders demand legitimate institutions, and will only support policies and legislation from institutions that they consider, to some extent, legitimate.

3.5.1 Defining legitimacy claims

Discourses on legitimacy can be described in terms of legitimation statements, a concept introduced by scholars of political communication (Hurrelmann et al., 2009). They provide the following definition of legitimation statements: *"A proposition qualifies as a legitimation statement if it explicitly assesses a political system or one of its key elements (objects of legitimation), usually drawing on a specific criterion (pattern of legitimation)"* (Hurrelmann et al., 2009, p.488). The concept is illustrated with the following example: *"The Liberal Democrat leader [Paddy Ashdown] told a rally in Eastbourne that the system was now so […]*

inefficient and secretive that it no longer served the citizen." (Times, 3 April 1992, in Hurrelmann et al., 2009, p.489). This statement contains an explicit reference to the criterion of legitimacy (efficiency and transparency in this case) and an explicit negative evaluation of the government system by these standards.

It is, however, also possible to look at more implicit forms of legitimation. By mentioning a stakeholder, a rationally behaving actor can convey the message that it appeals to the stakeholder's interests. As such, an institution such as the EC can signal that it derives some legitimacy from this stakeholder. In the case of the Ashdown statement, it can be argued that already by mentioning 'the citizen', the speaker indicates to be attentive to this constituency, and thus to derive legitimacy from them. These sources of legitimacy, or stakeholders, and the ones to whom the signal may be directed can overlap, but not necessarily so. If, for example, the EC mentions 'businesses' in a press release on some legislative proposal, it implicitly signals that the EC can be perceived as legitimized by these business actors. This signal may be intended to persuade businesses to support the EC, but may also send the message to another actor such as the EP: 'the EC stands for businesses in Europe'.

The concept of legitimacy claims builds upon the literature on legitimation statements but differs in a few crucial aspects. *First*, legitimacy claims as I define them are exclusively made by actors about themselves. Thus, the maker of the claim is also the main object of the claim. This contrasts legitimation statements, for which the objects and the author of the statement are distinguished. When applying this to the EC: the EC signals legitimacy claims to justify itself. When someone else publicly justifies the legitimacy of the EC, this does not count as a legitimacy claim. *Second*, and relatedly, claims to legitimacy always serve to enhance the reputation of legitimacy of the claim maker. The consequence of this is that, while legitimation statements can contain either positive or negative evaluations, claims to legitimacy are always positive. Therefore, the evaluative aspect of the claim does not need to be explicitly present in the proposition. *Third*, instead of the evaluative criterion or some intrinsic value, the stakeholders of the claim maker are treated as the sources, or patterns, of legitimacy. Referring to such stakeholders can, as argued, be considered as tapping from their legitimacy. In line with the second point, namely that legitimacy claims always serve the reputation of the claim maker, I assume that references to certain stakeholders are always positive. If a stakeholder becomes less relevant as a source of legitimacy, it will not be referred to negatively, but simply referred to less often. While, for example, De Bruycker (2017) qualitatively evaluated whether the public's interests were articulated, I assume that already mentioning the actor will often be a signal of standing for its interests. As such, I ignore appeals to cognitive and normative frames, and focus on appeals to pragmatic, that is, interest-based legitimacy convictions. I qualitatively tested the assumption that mentions are always positive, and indeed find that a large majority of the mentions of stakeholders sends a positive signal. I further report on the testing of this assumption in section 4.4.1, 'Legitimacy claims dictionary'. Following this line of argument, I define legitimacy claims as '*mentions of stakeholders with the goal of signaling that these form a source of legitimacy to the communicating actor'.*

3.6 Politicization

Over the last decades, there is one major trend that has affected the relations between all major actors in the EU-context: politicization. Politicization refers to something that used to be apolitical but is now transferred to the domain of political conflict. I adhere to the dominating definition in the field of EU governance: politicization is *"an increased public involvement of societal actors such as political parties, mass media, social movements in the process of European integration, and the degree to which this resonates among the wider European citizenry"* (de Wilde, 2011). The literature on politicization converges on the multi-dimensional character of this concept, which includes the following three components: (1) increasing salience, (2) growing polarization and (3) a broader and deeper mobilization (Rauh, 2016). The first one, increasing salience, refers to the level of visibility of EU affairs to the wider public. Salience is a prerequisite to politicization: *"if an issue is not debated in public, it can be politicized only to a very limited extent, if at all"* (Hutter & Grande, 2014, p.1004). The second one, growing polarization, refers to the level of controversy over a certain issue. It has often been reported that EU-policy making has become increasingly contested amongst the wider public (Hooghe & Marks, 2009). Polarization can be defined as the *"intensity of conflict"* (Hutter & Grande, 2014, p.1004), or the *"diversity of opinion"* (de Wilde, 2011, p.567). The third one, mobilization, refers to the extent to which different positions on a certain debate are voiced in the public arena (Rauh, 2016). As De Wilde (2011, p.567) states: *"as more actors become involved and more resources are spent, debates intensify and this contributes to politicization".* Summing up, politicization is the combination of these three components that are equally necessary in order for the phenomenon to occur.

The increased politicization of European integration (Rauh, 2016) does not leave the EC unaffected. Of all EU institutions, the EC can be said to form the focal point of debate: it would be a *"bastion of Europhiles"* filled with officials who are concerned only with pushing European integration forward (Brack & Costa, 2012, p.101). Responding to this trend, the EC set out to improve its reputation with various notable measures to claim legitimacy even more effectively. Examples of these are enhanced communication policies (Altides & Kohler-koch, 2009), the implementation of a transparency regime (Cini, 2008; Hüller, 2007) and participatory instruments to foster citizens' involvement (Saurugger, 2010), all *"deliberate attempts at legitimizing the European Communities"* (Biegoń, 2013, p.194). Thus, EC practices seem to echo previous research indicating that supra-national elites adjust their communication when faced with increased politicization of their institution or policies (Bunea, 2018; De Bruycker, 2017).

One must note, however, that not everything the EC does is politicized. Some issues stand out in the public attention they receive, while others go by rather unnoticed outside the bureaucratic environment of Brussels. Less politicized issues might fly under the radar of public attention, but for institutional actors, it is not always clear beforehand which issues will get politicized and which will not. In times of higher politicization, chances are higher that issues will get politicized. This increases the interest the EC has in signaling responsiveness towards citizens when proposing new laws. Moreover, politicization increases the risk of the Member States and EP of facing trouble when they accept a proposal in which the interests of citizens are not well guarded (Schneider, 2019). For these reasons, politicization can affect the patterns of legitimacy claiming of the EC.

3.7 Effects of politicization

In the following section, I will take stock of the literature on the position of each of the two types of stakeholders, and hypothesize on the expected causal effects of politicization.

3.7.1 Citizens

In a democracy, citizens form the backbone of every claim to legitimacy: without their support, no institution can consider itself democratically entitled to rule. The citizens are the national electorates who hold their political leaders accountable. Historically, the representation of citizens was mainly covered by member state governments that could rely on an electoral mandate. Over time, however, the EC has shown attempts of increasing its accountability towards ordinary EU citizens, with *"an elaborate program of greater openness [and] transparency"* (Christiansen, 1997, p.86). One example is the European Citizens' initiative, which allows citizens to petition the EC on a subject they desire to get higher on the political agenda (Böttger, Conrad & Knaut, 2016; Vogiatzis, 2017). In other words, *"The Commission increasingly opens up to concerns of EU citizens"* (Bes, 2017, p.100). This can be explained as an effect of politicization. According to Rauh (2016), politicization incentivizes the EC to become more attentive to the relevance of the general public as a stakeholder. He stated that: *"while the institutional design of the Commission hinges on the idea to insulate its decisions against political pressure and mainly relies on the assent of national executives, the general EU politicization makes the European public a much more direct stakeholder of European decisions."* (Rauh, 2013, p.1). With the spotlight on, public interests tend to prevail, making citizens a more natural ally to the EC. Based on this, I arrive at the following hypothesis.

H1. A higher level of politicization leads to a higher number of legitimacy claims directed at citizens.

3.7.2 Businesses

From the very beginning, the European Community has been an economic enterprise: by fostering mutual trade relations and gradually removing tariff barriers and border controls, the common market was served. Businesses, such as industries or investors, rely on the EC as a guardian of the free markets. Indeed, it has been found that business lobbying groups see the EC as increasingly relevant for their interests (Eising, 2004). On the other hand, the EC also relies on the businesses for their support. For example, Coen noted that *"many [EC] officials believed that business represented a natural political constituency and that their own grass-root credentials and legitimacy were strengthened by the close informational relationship established"* (Coen, 1998, p.79). Businesses hold valuable information that the EC needs for effective governing, they actively guard their interests in Brussels and can decide over major investment options. For these reasons, business preferences cannot be easily overlooked by the EC (Dür et al., 2015). In the wake of politicization, however, I expect that the importance of business actors is waning. For example, studies on lobbying success found that the influence of the corporate lobby decreased when the public salience of an issue increased (Dür et al., 2015; Mahoney, 2007). I expect that the brighter spotlight of politicization decreases the relevance of businesses as a source of legitimacy for the EC. Based on this, I hypothesize as follows:

H2. A higher level of politicization leads to a lower number of legitimacy claims directed to businesses.

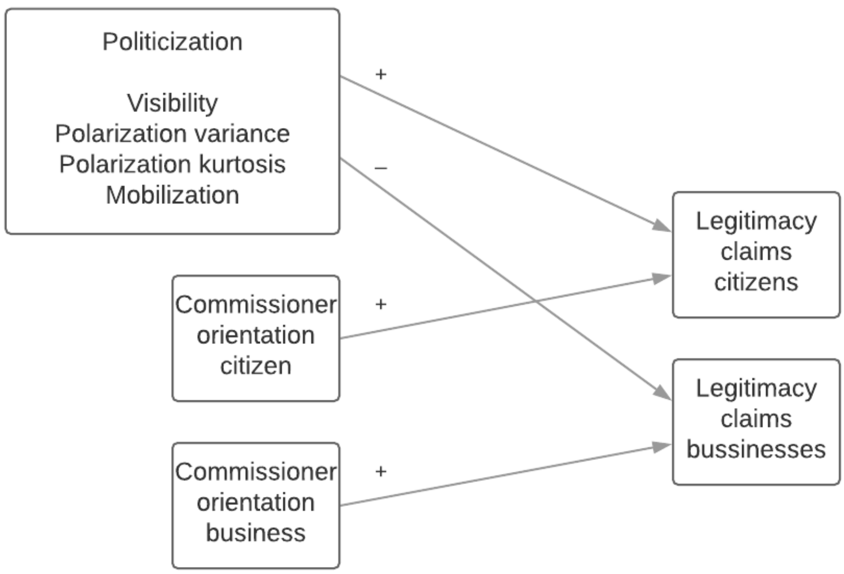
3.7.3 Commissioner orientation

There is, however, a factor that may also influence the number of legitimacy claims directed at businesses and citizens: the orientation of the Commissioner. As a result of organizational cultures and competencies, the various Directorate-Generals (hereafter: DG) have been found to differ significantly concerning their interests, beliefs and thus priorities (Klüver, Mahoney, & Opper, 2015). With the Commissioners formally in the lead at each DG and often acting as the highest 'spokesperson', I assume that the orientation of the DG is indicative of the orientation of the Commissioner. The DG's, and thus their Commissioners, can be classified as either businesses or citizen-oriented. For example, the more protectionist DG Agriculture often opposes the more liberal DG Trade (Dür & Zimmermann, 2007). Some DG's focus at shielding consumers and citizens from the negative side-effects of the markets, while other DG's are more concerned with upholding the free, competitive and stable market. As economic and public interests often contradict each other, it is likely that the DG's will adopt different strategies when claiming legitimacy in order to convey their message to their key audiences, respectively the markets or the public. For example, it has been shown that citizen-friendly DG's significantly more often sought public opinion by issuing special Eurobarometers, when compared to business-oriented DG's (Haverland et al., 2018). I expect that the orientations of Commissioners matter for the legitimacy claims in the political communication under their supervision. Therefore, I hypothesize:

H3a. A business orientation of the lead Commissioner leads to a higher number of legitimacy claims directed at businesses.
H3b. A citizen orientation of the lead Commissioner leads to a higher number of legitimacy claims directed at citizens.

All hypothesized causal relations are depicted in Figure 1. I expect legitimacy claims to be significantly affected by the index variable of politicization as well as each of the separate components: visibility, polarization variance, polarization kurtosis and mobilization.

Figure 1. Hypothesized relations. Politicization index and components, Commissioner orientation citizen, Commissioner orientation business and the dependent variables legitimacy claims citizens and legitimacy claims businesses.



4. Strategy of inquiry

In order to test the hypotheses, I made use of two sources: 1. data on politicization within the EU as assembled by Rauh (2016) and 2. data on the relative quantity of legitimacy claims retrieved by an automated text analysis of press releases issued by the EC between 1997 and 2009. In the first section, I present an overview of the variables included in the analysis. After that, I describe the data collection and descriptive statistics of both data sources.

4.1 Variable overview

The following table provides an overview of the variables that I use for this thesis, their operationalization and source. Note that scores for all variables are aggregated to monthly scores.

Table 1. Variable overview.

Variable	Operationalization	Source
Politicization	Politicization: index variable combining visibility, polarization variance, polarization kurtosis and mobilization.	Rauh
	Visibility: relative number of newspaper articles referring to the EC or EU	
	Polarization variance: squared average deviation from the mean level of public EU support	
	Polarization kurtosis: 'peakedness' of public EU support	
	Mobilization: the sum of protests related to the EU	
Legitimacy claims citizens	Relative number of explicit references to citizens in press releases	Press releases
Legitimacy claims businesses	Relative number of explicit references to businesses in press releases	Press releases
Commissioner orientation	Business: share of press releases in a month that cite a Commissioner with an orientation towards businesses	Press releases
	Citizen: share of press releases in a month that cite a Commissioner with an orientation towards citizens	
	Mixed: share of press releases in a month that cite one or multiple Commissioners with an orientation towards businesses and citizens	
	Neutral: share of press releases in a month that cite no Commissioner, or a Commissioner with no evident orientation	

4.2 Politicization data

In order to arrive at an adequate measure of politicization, I intend to follow the dataset as built by Rauh (2016). These data form an authoritative source on the long-term politicization of the EU, based on the body of literature on the underlying concepts. This dataset, in monthly intervals, spans the period between January 1990 and December 2009. For this thesis, I focus on the period between 1997 and 2009, a period that includes the treaty of Lisbon (2006), the introduction of the Euro and multiple EP elections. Data were collected in the six founding countries of the EU: Germany, the Netherlands, Belgium, Luxemburg, France, and Italy, to arrive at an aggregate politicization score for these countries combined. The three components of politicization were all included in this dataset. Visibility was operationalized as *“the monthly number of articles that contain at least one reference to the EC or EU expressed as a share of the overall monthly number of articles published in the newspapers under analysis”* (Rauh, 2016, p.13). Polarization was operationalized as the spread (variance) and peakedness (kurtosis) of opinions about a nation’s membership of the EU, as expressed in the Eurobarometer. As such, it incorporates both the likelihood that individuals will have different opinions on the EU and the extent to which opinions diverge across the breadth of society. Lastly, mobilization was operationalized as the sum of Europrotests, defined as *“all incidences of contentious claims making to which the EU or one of its agencies is in some way either the source, the direct target, or the indirect target of protests and the actors come from at least one member state”* (Imig & Tarrow, 2001; Rauh, 2016, p.20). There are no missing data to politicization.

Calculating the Cronbach’s Alpha revealed that the internal consistency of visibility, polarization variance, polarization kurtosis and mobilization is low, with $\alpha = .59$. This casts some doubt on whether the index variable, combining the components, provides a consistent measure of politicization. On the other hand, perceived from the point of view of the EC, these components may all be interpreted as independent expressions of politicization (Rauh, 2016). Thus, the politicization variable can be seen as an additive index, summarizing the components. I decided to test for the effects of the politicization variable as well as the separate components. For the politicization variable, the separate components were placed on similar scales. Monthly values of the visibility, opinion variance and kurtosis, as well as mobilization, were z-standardized into four generic time series that fluctuate around their investigation period mean (as indicated by 0) with a standard deviation of 1 (Rauh, 2016). The separate component variables, visibility, polarization variance, polarization kurtosis and mobilization were not included in a standardized manner but using their original scores.

4.3 Press release data

The online database of press releases issued by the EC contains 21.851 documents that were issued between 01-01-1997 and 31-12-2009. From this collection, I scraped the press releases that discuss proposals for directives and/or regulations. The politicization data allowed for a study on the full period between 1990 and 2009. However, since the press releases before 1997 could only be found in a format that turned out to be less fit for scraping. For this reason, they were not included. In the following sections, I will first explain why I choose to study press releases. After this, I move on to a section describing the procedure for filtering the right press releases, a section on data preparation and a section on the operationalization of the variables retrieved from the press releases.

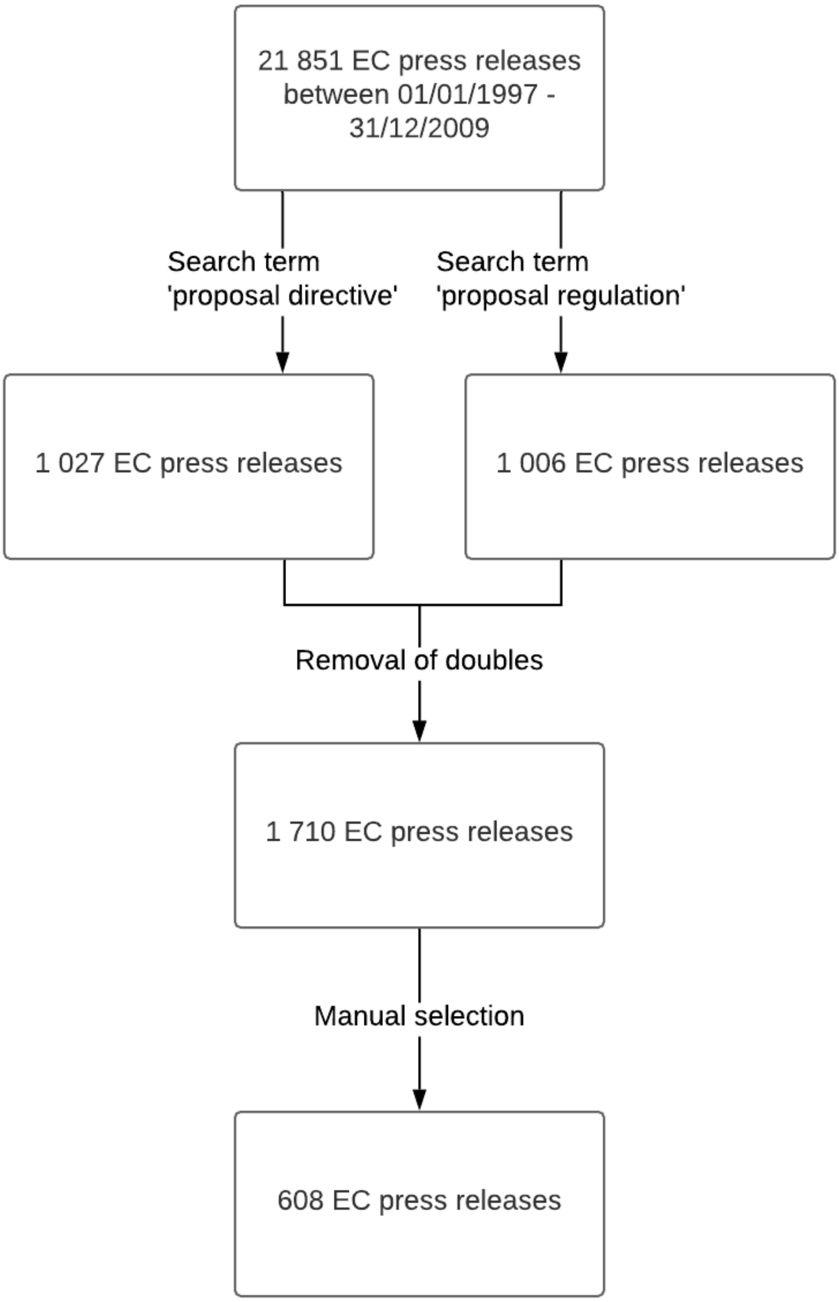
4.3.1 Reasons for studying press releases

There are several arguments why press releases fit the research question of this thesis. *First*, press releases are a critical component of political communication (Grimmer, 2010). Especially when proposing a new law, the EC has a stake in convincing others of its legitimacy. Press releases serve to inform the public and political elites through the media on what the EC is doing and how it defends its course, and are issued on many occasions of new legislative proposals. Statements in the media are the result of a media selection process (Aelst & Walgrave, 2016). This means that research on media statements often suffers from the impossibility of grasping the effect of this selection on the difference between the intended communication by the claiming actor and the final statement in the media. By studying press releases, I overcome this threat to the external validity that has hampered previous research on elite statements (De Bruycker, 2017). This allows for an unfiltered sight on the intended communication of the EC, while it is still ‘unmediated’ by the media. As such, they are representative of the communication strategy of the EC. *Second*, a preliminary qualitative inspection proves that the press releases do contain explicit references to businesses and citizens that can be categorized as legitimacy claims. I further illustrate this in section 4.4.1, on the operationalization of legitimacy claims. *Third*, it is important for the validity of the automated text analysis to include documents that are as homogeneous as possible in terms of goal, content, and style (Grimmer & Stewart, 2013). This is the case for press releases: they hardly changed over time. The fact that I select press releases that discuss proposals for directives and/or regulations adds to the validity in this aspect.

4.3.2 Filter procedure

The filtering of the press releases took place in three steps. *First*, I used the search terms ‘proposal directive’ and ‘proposal regulation’ to distill a potential selection of documents. After removal of doubles, this led to a selection of 1710 press releases. I used scraping software (WebScraper) to acquire these press releases from the online database of the EC. *Second*, I manually read and coded these 1710 documents to secure the inclusion of those press releases that explicitly discuss proposals for one or more directives and/or regulations that have not yet been accepted or rejected by the member states and/or the Council and/or the EP. This is because the interest of the EC in selling its position is most explicit when it defends a policy proposal. In practice, this means that those documents that discuss on the application of the law in individual instances (e.g. Denmark does not live up to a directive on the telecom sector) were excluded, just as those documents that respond to external events. Press releases sometimes discuss multiple proposals, these were included. This led to a final selection of 608 press releases for 156 months. For each month between 1997 up to and including 2009, I combined the data retrieved from these press releases. During 11 months, no press releases were published that meet the criteria. I treated values for these months as missing. Excluding the months that did not have any press release, the average number of press releases per month is 4,2. The mean number of words per press release is 446,9. Figure 2 illustrates the filtering procedure.

Figure 2. Filtering procedure.



4.3.3 Data preparation

I applied techniques common to text analysis in the field of political science for preparing the data for analysis (Benoit et al., 2018; Grimmer & Stewart, 2013; Welbers, Van Atteveldt, & Benoit, 2017). *First*, I removed pictures, numbers, stop words, and punctuation marks. *Second*, I transformed uppercase letters into lowercase letters. *Third*, I took some additional measures based on the qualitative inspection of the press releases, which I explain in section 4.4.1, 'legitimacy claims dictionary'.

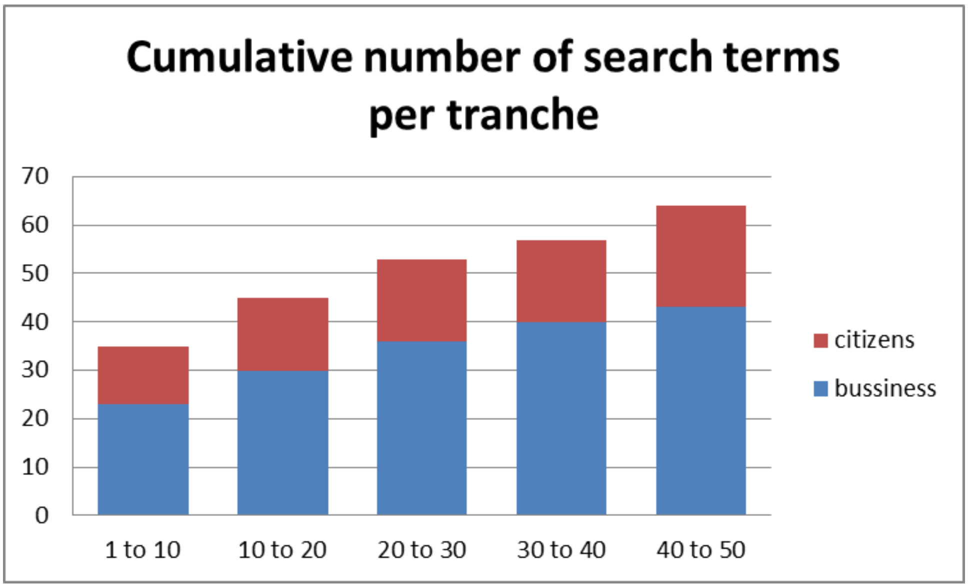
4.4 Press release variables

From the press releases, I retrieved data on the following variables: legitimacy claims to citizens, legitimacy claims to businesses and the orientation of the lead Commissioner.

4.4.1 Legitimacy claims dictionary

I operationalize a legitimacy claim as an explicit reference to a type of stakeholder. By mentioning this constituency, the EC signals that their interests and position is taken into account for the document at hand. Businesses and citizens can be referred to with a variety of words, such as ‘companies’ and ‘industry’, or ‘consumers’ and ‘people’ (De Bruycker, 2017). To combine the counts of these mentions for each stakeholder, a dictionary of search terms is necessary (Welbers et al., 2017). To arrive at this, I carried out a careful, qualitative procedure. First, I sampled 50 press releases from the total selection, with 3 or 4 for each year between 1997 up to and including 2009. From this, I randomly took 5 tranches of 10 press releases, read them, and noted for each tranche of 10 documents all words referring to either citizens or businesses. This leads to a list of search terms. Figure 3 displays the cumulative number of search terms that I traced in the press releases per added sample of 10. It shows that with each added tranche of 10, I found a small number of new search terms.

Figure 3. Cumulative number of search terms per tranche.



Quite a number of search terms, however, occur only once in the sample of 50 press releases. When these single-occurring search terms are left out, the cumulative number of search terms shows that with each tranche, the number of added search terms decreases drastically. After having read 30 press releases, I found no more new search terms that occur more than once in the full sample of 50. This correction is displayed in Figure 4. This leads me to conclude that qualitative investigation of 50 sampled press releases adequately informs the search term dictionary and that reading more documents would not enhance it.

Figure 4. Corrected number of search terms per tranche.

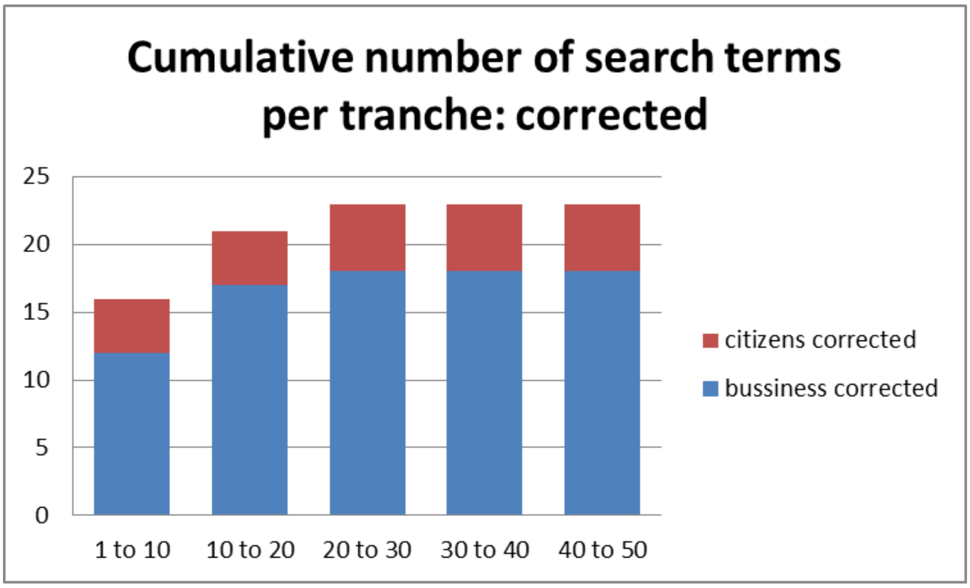


Table 2 shows the search terms I found indicative for legitimacy claims towards the respective stakeholders, accompanied by some example quotes. Note that both single and plural forms of the words are taken into account.

Table 2. Search terms.

Stakeholder	Search terms	Example
Citizens	Consumers, people, workers, public, citizens	"Biocides play a crucial role in controlling the spread of harmful organisms, but they must not be allowed to jeopardise the safety of European **citizens** or the environment."[2]
Business	Business, industry, manufacturer, SME, producer, insurer, insurance, company, employer, airport, financial sector, financial services, estate agent, casino, operator, agriculture, fisheries, bank, enterprise	“The high level of environmental ambition and the relatively short implementation period has been possible due to close co-operation between authorities and **industry** in Europe, USA and Japan.”[3]

Based on the qualitative inspection, I took some additional measures to enhance the validity of the dictionary. *First*, some of the function titles of Commissioners contained search words (e.g. ‘health and **consumer** safety’) that should be excluded as well. Otherwise, these would be mistakenly counted as legitimacy claims. The function titles identified as problematic on this aspect were rewritten with the word ‘functiontitle’ in it (e.g. ‘health and functiontitle safety’). *Second*, it could be the case that for various other reasons, search terms do not refer to legitimacy claims. While legitimacy claims convey the message that the EC listens to a certain stakeholder or is doing its best for this stakeholder, sometimes there may be other reasons for mentioning a stakeholder. Potential examples of this could be proposing rules to

[2] Environment: Commission proposes to improve the safety of biocides and to simplify authorisation procedures. Brussels, 12 June 2009

[3] Commission acts to reduce pollution from tractors, construction equipment and other non-road machinery. Brussels, 14 January 2003.

restrict the actions of businesses, higher taxation for consumers or procedural mentions of a stakeholder. These are all examples in which the EC does not necessarily convey the message of standing for the interest of the mentioned stakeholder, and should thus be kept at a minimum. To investigate this, I coded all references to the search terms present in the sample of 50 press releases as 'legitimacy claim' or 'else'. In this sample, the category of citizens was referred to 96 times, and the business category 191 times. For the citizen category, 79,2% were full legitimacy claims, and for the business category 89,5%. One outlier press release with a striking number of references to 'public authorities' and 'public contracts' accounted for a large share of the non-legitimacy claim references to citizens. For this reason, I removed the whitespace between these words (e.g. 'public authorities' for all press releases in order to have the dictionary ignore these occurrences. As a result, the percentage of legitimacy claims out of all references to the citizen category went up to 91,6%. Having found no more generic ways of enhancing the data or dictionary, I consider these ratios acceptable. All in all, the qualitative investigation of the documents indicates that the dictionary is sophisticated enough to allow for valid measurement of the legitimacy claims.

4.4.2 Calculation of legitimacy claim scores

I calculated the final legitimacy claim score per month as follows. For each press release, I counted the number of references to both categories of stakeholders by the search terms in the dictionary, controlled for the Term Frequency – Inverse Document Frequency (hereafter: TF-IDF) score of these word occurrences. The TF-IDF statistic increases with the number of times a word increases with every occurrence in a document, offset by the number of documents in which it appears. As such, I obtain a score for the relative importance of such a word occurrence, corrected for the fact that some words are used more often in general (Welbers et al., 2017). Subsequently, I calculated the mean legitimacy claim score per month for both citizens and businesses. Next, I divided this score by the total number of words that were used for the press releases in that month to correct for differences in the amount and length of press releases in a month. These scores were then multiplied by 100 to facilitate interpretation. This means that theoretically speaking, a legitimacy claim score can range between 0 (not a single mention of a stakeholder) and 100 (a press release with only mentions of the stakeholder, but no other words).

4.4.3 Commissioner orientation

I operationalize the orientation of the Commissioner as the orientation of the DG the Commissioner leads, and assume it to be stable for each 5-year mandate. The orientation of the Commissioner will be retrieved as follows. For each press release, mentions of the name of Commissioners were noted. The portfolios of these Commissioners were, for each mandate of 5 years, classified as either 'public', 'business' or 'neutral'. This classification is based on expert estimates from the literature (Bernhagen, Dür, & Marshall, 2015; Klüver et al., 2015). For those press releases in which only one Commissioner was mentioned, I assigned his/her orientation to the press release. If multiple Commissioners were mentioned in the press release, or if the function title of the Commissioner indicated both a public and business orientation, the press release was coded as 'mixed'. Thus, each press release was coded as one of these four categories. Then, I calculated a score per month for each of these categories by dividing the number of press releases per category in a month by the total number of press releases in that month. This leads to four variables with scores ranging from 0 to 1.

4.5 Analysis

I carried out two separate ARIMAX models for the analysis of time series including exogenous variables: one on citizen legitimacy claims, and one for businesses legitimacy claims. ARIMAX models are especially suitable for including independent variables in time series. Basically, it is a regression model extended with three parameters. The autoregressive term (AR, also indicated with p) is a lagged value of the dependent variable that significantly correlates with the most recent value. The moving average (MA, also indicated with q) refers to the lagged error terms. The I in ARIMAX stands for 'Integrated', refer to the practice of differencing data to make these stationary. This is also referred to with d. The values of these three parameters (p,d,q) depend on various tests and inspections of the data. To arrive at the model with parameters that fit the data best and at the same time meets all the assumptions, I conducted these tests and inspections step-by-step, following an existing flowchart (Andrews et al., 2013). First, I present some steps general to both models, after which I move on to steps specific to the citizens or businesses model. I built the models based on politicization as one variable. Including the separate components of politicization instead did not lead to substantial changes to the test statistics.

4.5.1 General steps

Step 1. This assumption requires that the mean and variance of all variables are stable over time. First, I checked whether the politicization variable was stationary. Because Rauh (2016) already indicated that there was a trend to the politicization data, I started out with this variable. For this, I conducted an Augmented Dickey-Fuller (hereafter: ADF) test, with the number of lags set at 4. I obtained the number of lags by calculating the FPE, AIC, HQIC and SBIC information criteria. The FPE and AIC indicated that the number of lags should be 4, HQIC reported 2 and SBIC 0. I sided with the majority, so 4, and the ADF showed that the assumption of stationarity is not yet met, with $p = .23$. I also tested the ADF with the number of lags at 2 and 0. With 2, the assumptions would still not be met, but at 0, data showed stationarity. I concluded that the stationarity of the data cannot be assumed. The same procedure was followed for visibility, polarization variance, polarization kurtosis and mobilization. This showed that visibility, polarization variance and polarization kurtosis are not stationary, with $p =.00$.

Step 2. A common measure to transform non-stationary time series to stationary is differencing. Differencing means that all values will be replaced by the value of the change compared with the previous value. So, for a time series Y, each value at observation t will be replaced $Y_t - Y_{t-1}$ if differencing by 1 is applied. If one variable is differenced, all variables in the analysis should be. Hence, I applied the differencing by 1 to all variables, independent and dependent.

Step 3. Having differenced, I tested again for the stationarity of the independent variables. With the number of lags (12) again obtained by calculating the FPE, AIC, HQIC and SBIC statistics, I concluded based on the ADF-test that the data for all variables are now stationary. This time, the result of the ADF-test was similar following the advice of all four information criteria. Having carried out the tests common to both the citizens and businesses models, it is possible to move on to the separate sections.

4.5.2 Businesses model steps

Step 4. I evaluated the level of stationarity of the dependent data (business legitimacy claims score) using the ADF test, with the number of lags (6) obtained by calculating the FPE, AIC, HQIC, and SBIC information criteria. Results show that the time series is stationary, with $p < .001$.

Step 5. To inspect whether no reverse causality exists between the dependent variable and one or more of the independent variables, I performed a Granger causality test. For this, I adhere to a significance level of $p<.05$. The results show that four independent variables are significantly affected by the dependent variable: Commissioner orientation business, with Chi2 = 12.30, p. < .001, Commissioner orientation mixed, with Chi2 = 18.18, $p < .001$, Commissioner orientation neutral with Chi2 = 8.7, p=.01 and polarization variance with Chi2 = 6.65, p.= .04. A separate test for the index politicization variable revealed no significant reverse Granger causality. The Granger causality test does not prove causality in the strict sense, which would be theoretically implausible. It is, however, stressed in the literature on ARIMAX modeling that variables showing Granger reverse causality are to be removed (Andrews et al., 2013). Therefore, all four are excluded from further analysis. The following test statistics have been performed without these variables.

Step 6. Residuals should be stationary. An Augmented Dickey-Fuller test shows that this is the case, with $p<.001$.

Step 7. I tested for multicollinearity of the independent variables using a VIF test. This turned out to be quite low: results show a mean VIF of 1.07. This is fully acceptable according to common standards.

Step 8. Residuals should be normally distributed. Therefore, I conducted a Skewness/Kurtosis tests for Normality. Results show that this assumption can be met, with $p < .001$.

Step 9. Heteroscedasticity of the residuals should not be present, meaning that the variance should be constant. White's test for homoscedasticity shows that the data meet this assumption, with Chi2 = 6.03, $p = .97$.

Step 10. I conducted a Breusch-Godfrey test to check whether serial correlation is present in the data. Serial correlation means that the observations are not independent of each other. Results showed that serial correlation is present, with Chi2 ranging between 34.78 and 57.31 for lags ranging between 1 and 12, and $p<.001$ for all lags ranging between 0 and 12. As a consequence, it is necessary to include one or more AR and/or MA terms in the model.

Step 11. To obtain potential AR and MA terms, I plotted the autocorrelations and partial autocorrelations of the residual time series. The significant ($p<.05$) spikes of these plots indicate the values of the AR (p) and MA (q) parameters that could be included in the model testing. Results of the autocorrelations plot showed one significant MA spike at 1, therefore q=1. The partial autocorrelations plot displayed significant AR spikes at 1,2,3,4,5,6,7,8,11,13,14. Because it is better to keep the values for the AR and MA parameters low (Gamboa, Kumar, & Evans, 2014), I exclude significant spikes higher than 6 immediately from the analysis.

Step 12. Next, I evaluated all possible combinations of parameters to find the optimal ARIMAX model, based on inclusion of the separate politicization components and Commissioner orientation variables. Table 3 shows all combinations of parameters with the results of the Akaike Information Criterion (hereafter: AIC) and the Bayesian Information Criterion (hereafter: BIC) tests. These are common quantifications of the goodness of fit of a model. Note that the lowest values of AIC and BIC indicate the optimal combination of parameters. The AIC and BIC are not congruent: while the AIC points in the direction of ARIMAX(5,1,1), the BIC indicates ARIMAX (2,1,1). Since the information criteria do not agree, a pragmatic choice has to be made. The AIC assumes that the true model is not in the candidate set, which has been considered more realistic than the BIC assumption that the true model is the candidate set (Yang, 2005). On the other hand, the number of parameters should be kept as low as reasonable. As for this, it is known that the BIC penalizes model complexity more than the AIC (Gamboa et al., 2014). Taking into account that the (2,1,1) model is medium for AIC (but with a considerably lower AR term), and optimal for the BIC, I side with this combination of parameters. A constant was included since this yielded a slightly better AIC.

Table 3. AIC and BIC values for parameter combinations, businesses model.

p,d,q	AIC	BIC
1,1,1	371.18	391.15
2,1,1	366.68	389.49
3,1,1	365.87	391.53
4,1,1	366.34	397.71
5,1,1	360.02	391.39
6,1,1	361.19	395.42

The optimal formula of ARIMAX (2,1,1) can also be denoted as follows:

$$\Delta y_t = \mu + \Delta\beta politicization + \Delta\beta Commissioner\ citizen\ orientation \\ + \Delta\beta Commissioner\ neutral\ orientation + \phi_1 \Delta y_{t-1} + \phi_2 \Delta y_{t-2} + \epsilon_t - \theta_1 \epsilon_{t-1}$$

Where:

$$\Delta y_t = y_t - y_{t-1}$$

4.5.3 Citizens model steps

Step 4. I evaluated the level of stationarity of the dependent data (Citizens legitimacy claims score) using the ADF test, with the number of lags (6 or 9) obtained by calculating the FPE, AIC, HQIC, and SBIC information criteria. Results show that, at both lags 6 and 9, the time series is stationary, with $p < .001$.

Step 5. To inspect whether no reverse causality exists between the dependent variable and one or more of the independent variables, I performed a Granger causality test. For this, I adhered to a significance level of $p<.05$. The results showed that reverse causality is present for the variable Commissioner orientation business. Therefore, this variable is excluded from further analysis. A separate check showed that the index variable of politicization can be safely included concerning this assumption.

Step 6. Residuals should be stationary. An Augmented Dickey-Fuller test shows that this is the case, with $p<.001$.

Step 7. I tested for multicollinearity of the independent variables using a VIF test. The result shows a mean VIF of 1.64. This is quite acceptable by common standards.

Step 8. Residuals should be normally distributed. Therefore, I conducted a Skewness/Kurtosis tests for normality. Results show that this assumption can be met, with $p < .001$.

Step 9. Heteroscedasticity of the residuals should not be present. White's test for homoscedasticity shows that the data meet this assumption at a significance level of $p<.05$, with Chi2 = 45.93, $p < .001$. Based on this, I conclude that robust standard errors should be included in the model.

Step 10. I conducted a Breusch-Godfrey test to check whether serial correlation is present in the data. Results showed that serial correlation is present, with Chi2 ranging from 43.63 to 74.18 at lags from 1 to 12, with $p <.001$ for all lags. As a consequence, it is necessary to include one or more AR and/or MA terms in the model.

Step 11. To obtain potential AR and MA terms, I plotted the autocorrelations and partial autocorrelations of the residual time series. The significant ($p<.05$) spikes of these plots indicate the values of the AR (p) and MA (q) parameters that could be included in the model testing. Results of the autocorrelations plot showed one significant MA spike at 1, therefore q=1. The partial autocorrelations plot displayed significant AR spikes at 1,2,5,6. As with the businesses model, I immediately disregarded potential values of 7 and higher.

Step 12. Next, I evaluated all possible combinations of parameters to find the optimal ARIMAX model. Table 4 shows all combinations of parameters with the results of the AIC and the BIC tests. The AIC and BIC are congruent: both indicate ARIMAX (5,1,1) as optimal. Thus, I selected the (5,1,1) model. A constant was included since this led to a slightly better AIC value.

Table 4. AIC and BIC values for parameter combinations, citizens model.

p,d,q	AIC	BIC
1,1,1	84.52	115.90
2,1,1	58.82	93.05
5,1,1	44.91	87.69
6,1,1	46.15	91.78

This model can also be denoted as follows:

$$\Delta y_t = \mu + \beta politicization + \ \beta Commissioner\ citizen\ orientation + \ \phi_1 \Delta y_{t-1} + \ \phi_2 \Delta y_{t-2} + \ \phi_3 \Delta y_{t-3} + \ \phi_4 \Delta y_{t-4} + \ + \phi_5 \Delta y_{t-5} + \ \epsilon_t - \ \theta_1 \epsilon_{t-1}$$

Where:

$$\Delta y_t = \ y_t - \ y_{t-1}$$

5. Results

In this chapter, I present the results of the data collection and analysis. First, I present the politicization data, second, the legitimacy claims data, third, the combined descriptive statistics for all variables and fourth, the results of the two ARIMAX models.

5.1 Descriptive results

5.1.1 Politicization

Figure 5 presents the six-month moving average scores of the four time series that together constitute the politicization index: mobilization, opinion kurtosis and variance and visibility. Note that for both ARIMAX analyses, non-smoothed data have been used. Figure 6 shows the six-month smoothed data for the full politicization index as used for this study, with a trend line included. Inspection of the data determines that there is a slow increase in politicization over time, with substantial fluctuations.

Figure 5. Politicization components and index, six-month Moving Average.

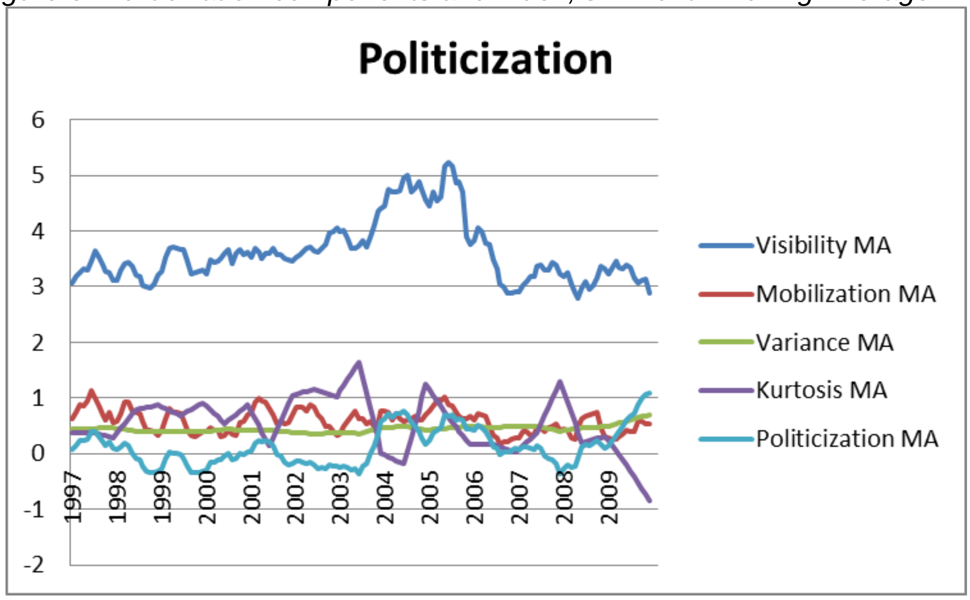
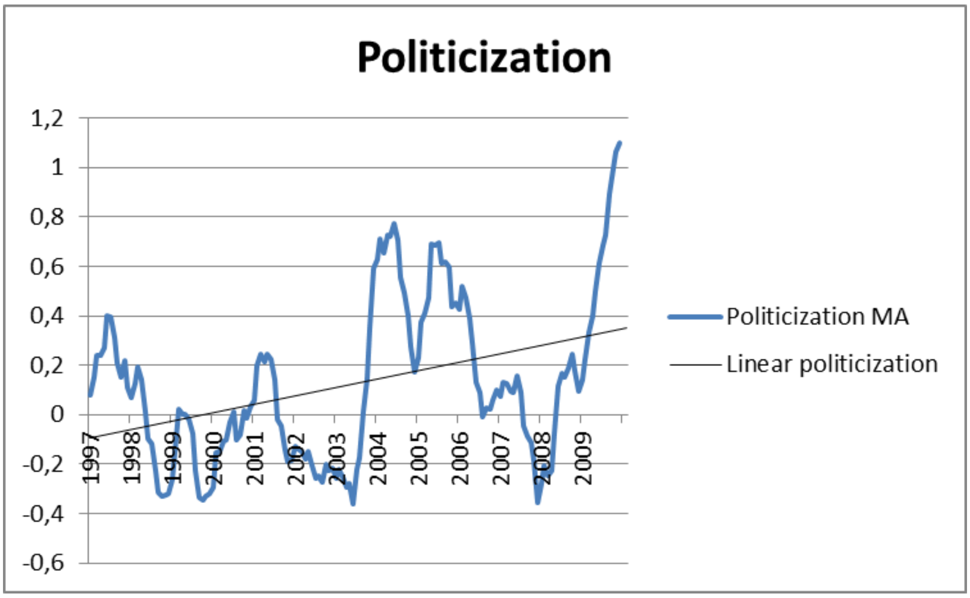


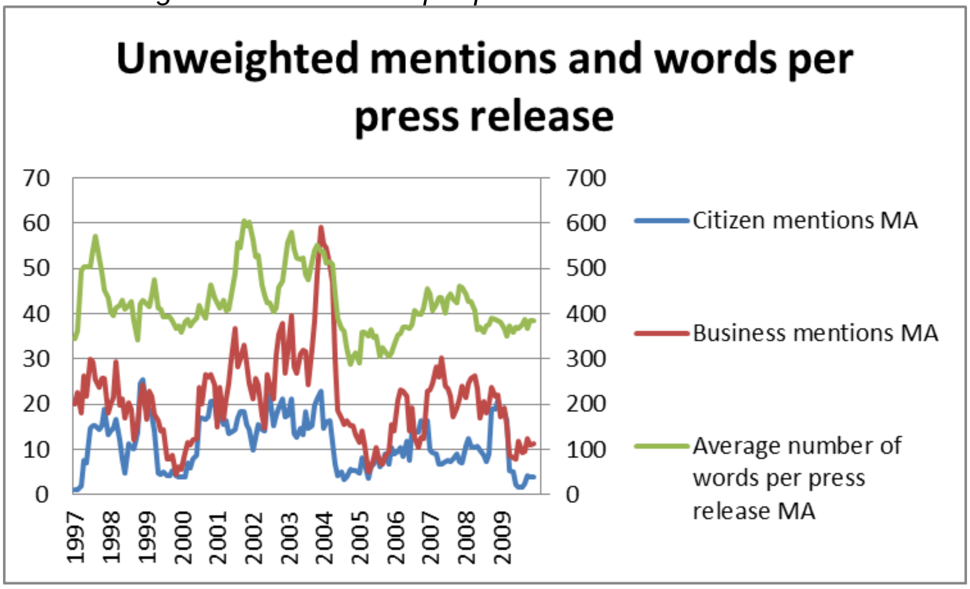
Figure 6. Politicization index, six-month Moving Average with trend line.



5.1.2 Legitimacy claims

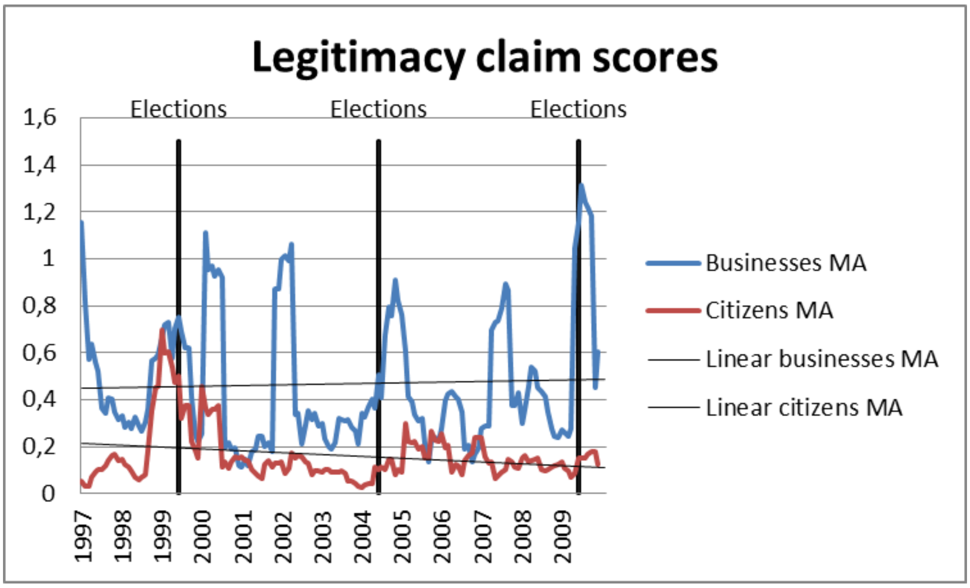
Next, I present the scores of the legitimacy claims towards citizens and businesses. First, Figure 7 presents the six-month average smoothed scores, unweighted for TF-IDF scores and not divided by the total number of words used in that month. Also, the average number of words per press release is depicted, again six-month average smoothed.

Figure 7. Six-month Moving Averages for non-TF-IDF weighted stakeholder mentions and the average number of words per press release.



In the following graph, Figure 8, the six-month Moving Averages of the legitimacy claim scores per month weighted for TF-IDF and divided by the total number of words in a month are presented, including the trend lines and EP election months marked.

Figure 8. Six-month Moving Averages for TF-IDF weighted stakeholder mentions, divided by the total number of words in a month, including trend lines and EP election years.



Before moving on to the ARIMAX results, I interpret the legitimacy claim scores as follows. *First*, the scores fluctuate substantially but over time, the average number of legitimacy claims per month towards citizens decreases, while the number of businesses legitimacy claims grows slightly. *Second*, the number of words seems to relate to the number of legitimacy claims, which is not surprising. This demonstrates the need for weighing the total number of words, which I did. *Third*, businesses are consistently referred to more often than citizens. The business legitimacy scores also fluctuate stronger than citizens legitimacy scores. *Fourth*, EP election periods could bring a different dynamic between the EC and its stakeholders. Although the EC officially does not run for re-election, Commissioners may have political ambitions that motivate them to pay special attention towards their reputation in this period. What is more, Member State governments have been shown to send stronger signals of responsiveness during election periods (Schneider, 2019), which might incentivize the EC to do the same. A visual inspection indicates that this does not play a role in shaping the patterns of legitimacy claims. In the run-up to the first EP elections, both legitimacy claims towards businesses and citizens peak. Near the second and third EP election, a peak is only visible after the elections for businesses legitimacy claims.

5.1.3 Overview

Lastly, I present an overview of descriptive statistics of the variables. Note that these are the descriptive statistics of non-differenced data.

Table 5. Descriptive statistics.

Variable	N	Mean	SD	Min	Max
Politicization	156	.14	.46	-.69	1.57
Legitimacy claims citizens	145	.16	.23	0	1.63
Legitimacy claims businesses	145	.47	.71	0	4.84
Commissioner orientation: citizen	145	.26	.30	0	1
Commissioner orientation: business	145	.47	.32	0	1
Commissioner orientation: neutral	145	.17	.24	0	1
Commissioner orientation: mixed	145	.10	.16	0	1

5.2 Businesses ARIMAX

As follows, I present the results of the ARIMAX (2,1,1) for the businesses analysis. In model 1, I considered politicization on its own, in model 2, I included covariates on the Commissioner orientation and in model 3, I included the separate components of politicization. In all models, the results show no significant effects on businesses legitimacy claims by any of the independent variables. Since Commissioner orientation business had to be left out of analysis because of Granger reverse causality, Hypothesis H3a, ‘A business orientation of the lead Commissioner leads to a higher number of legitimacy claims directed at businesses’ could not be tested. Note that N is somewhat lower because of missing values and differencing.

Table 6. ARIMAX (2,1,1) results of the businesses model.

	Model 1	Model 2	Model 3
	Coefficient (SD)	Coefficient (SD)	Coefficient (SD)
Constant	00(.01)	00(.01)	00(.01)
Politicization	-.06(.12)	-.07(.12)	
Visibility			.04(.13)
Polarization kurtosis			-.09(.48)
Mobilization			-.05(.23)
Citizen orientation		-.54(.37)	-.54(.39)
AR1	-.61(.05)***	-.59(.06)***	-.64(.07)***
AR2	-.23(.06)***	-.22(.06)***	-.33(.10)***
MA1	-1.00	-.10	-.10
N	128	128	128
Wald Chi2	178.65***	193.51***	189.92***

Significance levels: *α < 0.10, ** α < 0.05, *** α < 0.01.

5.3 *Citizens ARIMAX*

The following table displays the results of the citizens ARIMAX (5,1,1) model. Again, in model 1 with only politicization as independent variable, model 2 includes Commissioner orientation and for model 3, the separate components of politicization are added. For all models, the results indicate that there are no significant effects on the number of legitimacy claims as hypothesized. In model 3, Commissioner orientation mixed is slightly significant. Again, N is somewhat lower because of missing values and differencing.

Table 7. ARIMAX (5,1,1) results of the citizens model.

	Model 1	Model 2	Model 3
	Coefficient (SD)	Coefficient (SD)	Coefficient (SD)
Constant	.00(.00)	.00(.00)	.00(.00)
Politicization	-.03(.04)	-.05(.04)	
Citizen orientation		.08(.06)	.09(.05)
Mixed orientation		.19(.14)	.23(.14)*
Neutral orientation		.20(.15)	.19(.14)
Visibility			-.03(.02)
Polarization variance			.94(.76)
Polarization kurtosis			-.06(.05)
Mobilization			-.02(.03)
AR1	-1.03(.16)***	-1.11(.17)***	-1.14(.18)***
AR2	-.89(.16)***	-.1.03(.19)***	-.1.10(.20)***
AR3	-.65(.20)***	-.85(.24)***	-.92(.23)***
AR4	-.54(.19)***	-.67(.22)***	-.71(.22)***
AR5	-.35(.16)***	-.38(.15)**	-.40(.15)**
MA1	-1.00	-1	-1.00(.00)***
N	128	128	128
Wald Chi2	551.17***	601.41***	359.00***

Significance levels: *α < 0.10, ** α < 0.05, *** α < 0.01.

6. Conclusion and discussion

This thesis set out to answer the following research question: *'How does politicization affect the legitimacy claims the European Commission makes?'*. I combined data on politicization and newly gathered data on legitimacy claims in EC press releases and built an ARIMAX model for time series. This allowed for testing the effects of politicization and Commissioner orientation on the number of legitimacy claims over a longer period. The goal of this research was to explain the patterns of strategic legitimation practices of the EC in its communication.

Based on the results, I conclude as follows on the hypotheses. *First*, I expected that with higher levels of politicization, the EC would make more legitimacy claims directed at citizens. The results show no support of this hypothesis: there is no significant effect. *Second*, I hypothesized that higher levels of politicization would lead to more legitimacy claims directed at businesses from the EC. Analysis of the data indicates refutation of this hypothesis: I found no significant effects. *Third*, I formulated the expectation that the orientations of the portfolios of Commissioners cited in a month would causally affect the number of legitimacy claims. I expected that a business orientation would lead to significantly more businesses legitimacy claims and that a citizen orientation would lead to significantly more citizens legitimacy claims. The first hypothesis on Commissioner orientation could not be tested without violating the assumption of no reverse causality. The second hypothesis on Commissioner orientation was not supported by the data, and should be refuted. Commissioner orientation mixed showed a marginally significant effect on legitimacy claims towards citizens, with $p = .097$. Hence, I conclude that there is no effect of politicization on legitimacy claims by the EC, and no effect of Commissioner orientation of the lead Commissioner on legitimacy claims directed at citizens. A visual inspection indicates that EP election periods are not consistently related to different patterns of legitimacy claims, in line with previous research (De Bruycker, 2017). The presence of significant autocorrelation terms for the legitimacy claim scores in both the citizens and businesses model implies that a trend exists within these time series: the subsequent values are not independent of each other.

These findings are striking: from a rational organization that operates in an increasingly demanding context, one would expect adjustments to the communication when necessary. The role of appeals to business and citizen preferences within the policy process has remained remarkably constant. This means that findings of previous studies, for example, that the EC officials appeal to public interests more often in cases of politicized legislative proposals (De Bruycker, 2017), are contradicted when looking at press releases, over a long period. One may conclude that discursive practices of legitimation are not necessarily as responsive to societal changes as has often been found for behavioral legitimation, that is: policy making (Rauh, 2019; Williams & Bevan, 2019). These findings put the politicization literature in perspective: after all, the effects of this trend seem to be not visible in the communication of the EC. A visual inspection learns that the legitimacy claim scores do not substantially change in the run-up towards elections. This implies that legitimacy claims are not an aspect of electoral strategies, although further research is necessary to put this to a more severe test.

One major question throughout the process of conducting research was the ratio of qualitative and quantitative investigation of the data. While quantitative text analysis allows for scaling up of the body of texts to be analyzed, a lot of information can get lost in the process. I decided to inform my methodology with qualitative information on three occasions: 1. filtering the press releases, 2. informing the search term dictionary of legitimacy claims, and 3. validating and improving the search term dictionary of legitimacy claims. This proved to be of great benefit: not only did this allow for arriving at better-informed measures of legitimacy claims but it also led to an indication of how good these measures were. As roughly 90% of the mentions of stakeholders can be defined as legitimacy claims, the validity of these measures can be trusted upon. This shows that press releases can form a rich source of information on the communication towards stakeholders: they do not suffer from media selection bias and are representative of the full communication strategy of an actor. If the communication strategy is not reflected in press releases, there is no strategy. I believe that especially the method of qualitatively testing and improving measurement validity is promising because it can be scaled up to much larger quantities of textual data without demanding much more effort.

The findings of this thesis should be treated carefully, as there are some limitations. Some major stakeholders were not taken into account. Examples of these are Member States, the EP, and local public authorities. These actors are often considered relevant stakeholders to the EC as well. For example, Rauh mentioned Member States as the 'traditional stakeholders' of the EC (Rauh, 2016). Bunea (2018) lists public subnational authorities as one type of stakeholders speaking on behalf of the public. For this thesis, data limited the inclusion of such stakeholders: the percentage of legitimacy claims out of all mentions would end up far too low. This is because institutional actors are often mentioned procedurally, e.g. on they that will be responsible for carrying out a certain policy. I find it questionable whether discursive legitimation analysis can improve our understanding of the position of these institutional stakeholders in the eyes of the EC, as the incentives to publicly appeal to their interests are less clear. Previous qualitative research has provided valuable insights into the motives of EC officials (Bes, 2017), this might be a better way to go if one is to investigate this point.

For this research, the database on politicization (Rauh, 2016) proved a rich source of data. There are, however, some limitations to the use of these data. Politicization data were collected in the six founding countries of the EU, which leaves out a lot of data on politicization in other member states. Eastern-European countries may have, for example, specific dynamics of politicization that is not necessarily similar to these six countries. What is more, this thesis only included 13 years of politicization and press release data. In this period, major treaties were signed and crises erupted. It stops, however, before the real Euro crisis broke out. It would be interesting to find out whether, in times of economic crisis, the EC sees the need to appeal more to citizens or businesses. In times of crisis, the stakes of signaling to stand for certain constituencies might be even higher. Inclusion of economic covariates might turn out to partly explain the number of legitimacy claims. Thus, extending the time series beyond 2010 could be an interesting avenue for future research.

Another limitation to this thesis is that it looks only at discursive legitimation and ignores behavioral legitimation. In other words, it tests whether the communication of the EC changed as a response towards politicization, not whether it adjusted the content of the proposed laws. There is already a large body of research on whether and how the EC responds to corporate and citizen interest groups, and who gets to be most influential under what circumstances (Bernhagen et al., 2015). More longitudinal research involving quantitative text analysis might bring this field of research to a higher level (Tallberg & Zürn, 2017).

Why the EC has not changed its communication when proposing new laws forms an interesting puzzle for future research. Does the EC not deem it necessary or does it simply not see any viable alternatives to its current strategy? How do EC officials reflect on the communication towards their stakeholders in the media? The findings of this thesis generate more questions than answers. Nonetheless, I conclude that the EC seems to have remained asleep while politicization has been growing. If the legitimacy crisis of the EU is to be solved, the initiative need not be expected from the EC.

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