

Rethinking the 'where' and 'when' of EU interest groups

Testing the explanatory power of Punctuated Equilibrium theory in making sense of EU interest group politics in the EU policy process

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Rethinking the 'where' and 'when' of EU interest groups: Testing the explanatory power of Punctuated Equilibrium theory in making sense of EU interest group politics in the EU policy process

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Abstract

EU interest group research scholars often adopt a legislative perspective on the policy process. Its main components are a focus on a single institutional venue where the lobby takes place, and a specific legislative stage to select the cases and investigate the activity. However, some interest group research outcomes question the analytical and methodological validity of isolating interest group activities within a single institution and a specific legislative stage. This article introduces an alternative perspective on the policy process: Punctuated Equilibrium theory. This theory locates interest groups in multiple institutional venues at the same time. Also, it expects activities of interest groups to extend along multiple policy stages. Taking the case of EU's most recent Research and Innovation programme, Horizon Europe, this study tests the explanatory value of Punctuated Equilibrium theory. The results show that interest groups are active in multiple institutional venues at the same time, and that their activity spreads along multiple policy stages. The main conclusion of this article is that for future interest group studies in an EU context it is key to explicitly consider the conceptualization of how policies unfold in practice in relation to EU interest group politics.

Keywords

Interest group politics, Punctuated Equilibrium theory, framing, European Union

Introduction

Toshkov, Lowery, Carroll and Berkhout (2013) conclude that legislative activity and lobby activity in the European Parliament are not significantly related to each other. This is a surprising result given that an uncontroversial definition of the aim of lobbyists is to direct policy outcomes towards their interests (cf. Klüver, Braun, & Beyers, 2015, p. 450). While legislation that lobbyists are concerned with, undergoes change in the Parliament, it seems unlikely to expect no lobbyist around. An explanation for those results and a suggestion for further research is done by the authors themselves. They suggest that to understand the lack of a significant correlation, “we need to step back and consider in a much more precise manner when, how, and especially why organized interests become engaged in the policy process” (Toshkov et al., 2013, p. 68).

This is an important suggestion, because in their study a particular set of assumptions about the EU policy process is made: legislative activity is taken as a single point in time (the day a legislative proposal is published) and within a single institutional ‘venue’ (the European Parliament). They assume that this must be the location (i.e. the ‘where’) and the timing (i.e. the ‘when’) of lobby group activity. It might be that this conceptualization represents the reality of lobby groups in too limited terms, and leads to the disappointing results.

This article elaborates on why such an approach to the ‘when’ and ‘where’ of lobbyists’ activities is not adequate to explain the complex reality of EU lobbying. The case of Toshkov et al. (2013) can be extrapolated to a common issue in research of EU lobby groups. That is, a ‘legislative perspective’ of the policy process dominates studies about the activities, i.e. ‘politics’, of lobbyists, i.e. ‘interest groups’, in the context of the European Union (Dür, 2008; Klüver et al., 2015). In brief, EU interest group scholars look for traces of (actions of) lobbyists within a single European political institution, in the stage of formal decision-making (cf. Rasch, 2018; Toshkov et al., 2013) or policy formulation (cf. Klüver, 2013), as exemplified by the

study of Tohskov et al. (2013). However, some empirical studies challenge the explanatory value of this conception. This entails both 'where' lobbyists are expected to be and 'when' they execute their activities (Berkhout, Beyers, Braun, Hanegraaff, & Lowery, 2018; cf. Tohskov et al., 2013). As the root of the problem lies in the perspective of the EU policy process, an alternative conception might be better apt to explaining the reality of EU interest groups.

A powerful alternative approach is Punctuated Equilibrium theory. In short, this theory argues that interest groups mobilize around policy issues regardless of the institution where the legislation is being processed. Multiple institutions are lobbied at the same time and this timing does not necessarily coincide with a specific legislative stage where the policy (proposal) is in (Baumgartner, Berry, Hojnacki, Kimball, & Leech, 2009). Though, originally applied to the United States, Punctuated Equilibrium theory has also been successfully used in the context of the European Union (Baumgartner, Jones, & Mortensen, 2014; Green-Pedersen & Princen, 2016). This study provides insights into the applicability of Punctuated Equilibrium theory in investigating EU interest group research on a small case study-level, which is a new application for this theory.

The research question of this study is: What is the power of the Punctuated Equilibrium perspective of the policy process in explaining interest group mobilization and framing in an EU context relative to a legislative conception?

The article is built up as follows. First, the above argument will be expanded and research expectations formulated. Next, the methodological approach of this research will be introduced. Then, the analysis based on expert interviews and documents will be presented. The conclusion will state that Punctuated Equilibrium theory indeed enhances the understanding of where and when interest groups are active. Thereby, the article contributes to a better understanding of lobbyists' activities in relation to the EU policy process.

EU policy process conceptualization and interest group politics

EU interest group politics is not a narrowly defined term. Rather, it is a label that covers various avenues along which interest group activity is commonly investigated in relation to the EU political system (cf. Klüver et al., 2015). There are three main ways scholars approach EU interest group politics, namely by focusing on the mobilization of interest groups, the strategies interest groups use and the influence of interest groups on policies (Eising, 2016; Klüver et al., 2015; Princen & Kerremans, 2008). Mobilization scholars map active interest groups and look for observable ‘tracks’ of interest groups within given arenas as a political institution or in media coverage (Binderkrantz, Pedersen, & Beyers, 2016, p. 307). Strategies scholars focus on the activities that interest groups deploy within the policy process. For example, how they frame issues or which arena they choose for displaying their interests (Broscheid & Coen, 2003; Dür & Mateo, 2013; Hanegraaff, Beyers, & Bruycker, 2016). Influence scholars want to measure the effect or success of interest group efforts on changing or influencing EU policies (Dür, 2008; Klüver, 2013).

EU interest group scholars, whether they look at mobilization, strategies or influence, have often taken what in this article is labeled as a ‘legislative perspective’ as their vantage point to understand how the EU policy process unfolds. This view does not come out of nothing. Rather, it is an empirical application of the ‘ordinary legislative procedure’, which is the EU law blueprint for EU policy processes (European Parliament, 2017). According to this procedure, the Commission initiates legislation by proposing a policy. Consultations can be used to request stakeholders’ input. The European Parliament discusses this proposal and adopts a position. Also, the Council reacts, giving their comments on the Commission proposal and Parliament position. Subsequently, the Parliament and the Council discuss their position. The co-decided result becoming EU law.

In investigating EU policy processes, scholars have taken this procedure and translated it into a certain set of expectations about interest groups and their activity. This can be summarized around the notion of 'where' (the location) interest groups are expected to be, and 'when' (the policy stage) they are active. The next section covers the empirical application of this legislative perspective in EU interest group politics and deals with studies that problematize this application.

The controversies of the 'when' and 'where' of EU interest group politics

The first element of a legislative perspective concerns 'where' interest groups are active. In work by EU scholars, a focus on a single institutional venue to determine which interest groups are active can be often observed (Bernhagen, Dür, & Marshall, 2015; Beyers, 2004; Binderkrantz et al., 2016; Rasmussen, 2012; Toshkov et al., 2013; Wonka, Baumgartner, Mahoney, & Berkhout, 2010). For example, the Commission's Transparency Register is selected. Based on that inventory, it is subsequently concluded which interest groups are active within the EU political system (Hollman & Murdoch, 2018). This is also apparent in studies of strategies scholars. They understand strategies as a choice, whether interest groups will access one institutional venue or the other (Beyers, 2004; Broscheid & Coen, 2003; Callanan, 2011; Dür & Mateo, 2013; Knodt, Greenwood, & Quittkat, 2011), or towards which policymakers interest groups choose to frame their interests (Eising, Rasch, & Rozbicka, 2015; Eising et al., 2017; Klüver & Mahoney, 2015). Last, influence scholars do so by isolating the influence of interest groups on a particular institutional venue (for example the Commission, Dür & Mateo, 2012; or the Council, Hollman & Murdoch, 2018).

However, some studies problematize this focus as disregarding an important aspect of EU interest group politics. That is, 'where' interest groups mobilize, changes over time. This suggests that the 'where' should not be understood as a single institution and studied in isolation. Instead, the 'where' may encompass multiple institutional venues where interest

groups are active in, at the same time. As argued, Toshkov et al. (2013) is unable to explain why lobbyists are not active in the European Parliament during legislative activity. The authors chose to isolate the European Parliament on a specific moment in time. Berkhout et al. (2018) substantiate that this approach is unable to grasp the complex reality of how interest groups mobilize. Instead, the interest group population changes depending on which institutional venue is focused on and when. Coen and Katsaitis (2013) come to similar conclusions, as they show that the European Commission is in itself a multi-level venue, with different interest group populations per policy domain. Last, Ydersbond (2014) proves in a case study that interest groups are indeed active in multiple institutional venues at the same time. It is therefore problematic to exclusively focus on a single institutional venue in the complex political system of the EU.

The second element of a legislative perspective involves the timing of lobbying activities. In other words, *when* interest group activity is expected to be observed and thus measured. Interest group scholars often divide the policy process in accordance with the official legislative stages. Subsequently, they select the stage they expect interest groups to be active in. Especially influence and mobilization studies use this. First, influence scholars tend to use conceptual terms: the 'agenda setting' or 'policy formulation' stage (Bunea, 2013; Cairney, 2012; Dür, Bernhagen, & Marshall, 2015; Skodvin, Gullberg, & Aakre, 2010). In other occasions, the stage is conceptualized in empirical terms, namely the official Commission consultation phase (Klüver, 2013; Rasch, 2018). During these phases, the European Commission invites stakeholders to submit their ideas on the proposed policy. By comparing the input of interest groups in these stages with the end result of the proposal, these authors claim to be able to measure the influence of interest groups on the respective policy (Dür, 2008). Mobilization scholars also use such an isolated stage to map the active interest groups at that time. Toshkov et al (2013) and Berkhout et al (2018) investigate the activities of interest groups during which

the European Parliament is debating about their views on proposed legislation. Thus, in studying the timing of EU interest group politics, scholars isolate activity within a policy stage. This is quite problematic.

The position of understanding lobby activity as an activity taking place during a discrete stage or time meets with difficulties in simplification. Rasch (2018) finds that in all three of his case studies, it is hard to get a clear comparison between the two 'stages of decision-making' he distinguished. The two phases turn out not to be comparable enough to determine the impact of interest group framing on policies. Klüver (2013) encounters a similar problem. She measured influence of interest groups by comparing textual differences in the policy text at two points: the policy proposal and the final policy text. However, still she has doubts that attributing textual variance to EU interest group activity is theoretically speaking sufficiently convincing. In short, using an isolated policy stage heuristic may not be very conclusive in understanding interest group politics. This opens up the possibility of investigating the interest group politics from the focal point of overlapping and intertwined policy stages (cf. Baumgartner et al., 2009; Princen, 2018). This conclusion is further supported by Marshall (2010). He conceptualizes two discrete legislative phases of a policy and appoints them to the institutional venue of the Commission and the Parliament respectively. The expectation is that interest group activity will concentrate within a single institutional venue in the 'right' legislative phase. However, he concludes that interest groups follow rather more complex institutional, and often also informal, patterns of activity. These are not necessarily connected with the official start of a legislation. Therefore, avoid using hard boundaries of the phases of the legislative cycle allows for a more empirically precise way of describing the relationship between different interest groups, political institutions and the policy issues that are at play (Daviter, 2007).

Table 1 provides a more elaborate overview of studies that investigate interest group politics from a legislative perspective and those that suggest an alternative view. It can be seen that there are ample research examples that focus on single institutions and an isolated policy stage.

Table 1: Overview legislative perspective and contrasting studies

Topic	Legislative perspective	Research examples	Contrasting studies	Research examples
<i>Venues interest groups are active in</i>	Single institution	Bernhagen et al., 2015; Beyers, 2004; Bunea, 2013; Binderkrantz et al., 2016; Broscheid & Coen, 2003; Callanan, 2011; Dür & Bièvre, 2007; Dür & Matteo, 2012; Dür & Matteo, 2013; Eising et al., 2015; Eising et al., 2017; Hollman & Murdoch, 2018; Klüver & Mahoney, 2015; Knodt et al, 2011 Rasmussen, 2012; Wonka et al., 2010;	Multiple institutions	Berkhout et al., 2018; Coen & Katsaitis, 2013; Toshkov et al., 2013
<i>Timing of interest group activity</i>	Determined by the (discrete) stage of the legislation	Beyers & Kerremans 2012; Bunea, 2013; Dür, 2008; Dür et al., 2015; Klüver, 2013; Rasch, 2018; Skodvin et al., 2010	Overlapping and interconnected stages	Baumgartner et al., 2009; Daviter, 2007; Princen 2018; Ydersbond, 2014

Punctuated Equilibrium theory: an alternative perspective on the policy process

In sum, EU interest group scholars have some serious problems understanding ‘where’ and ‘when’ interest groups are active. In contrast, Punctuated Equilibrium theory suggests different expectations about ‘where’ and ‘when’ interest groups are active. Namely, it expects that interest groups will display political activity in multiple institutional venues at the same time. Also, not the legislative cycle of a policy from proposal till end result, but attention of relevant stakeholders (political and non-political) limit the debate on a certain policy issue. How this is understood in Punctuated Equilibrium theory, will be explained below. These

expectations are in line with what is suggested in some of the EU interest group literature already. In short, 'where' is not a single institutional venue but consists of multiple institutional venues and 'when' might trump a single policy stage.

The macro political system is the starting point for Punctuated Equilibrium theory. In this study, this is the European Union. The system can only pay selective attention to policy issues due to constraints in processing the available information (Green-Pedersen & Princen, 2016, p. 72). As a consequence, within the political system, the attention to most of the policies is disaggregated into 'issue-oriented policy subsystems, to deal with all the various issues and pieces of information. Commission officials, Council officials, Members of Parliament and interest groups together discuss the policy issue in the respective subsystem. Contrary to isolating a single institutional venue, Punctuated Equilibrium theory argues that "partially independent institutional venues" work in parallel on the same or overlapping policy issue (Baumgartner et al., 2014, p. 83). Thus, 'where' interest group politics can be expected, is a question that requires investigating policy debates. Within these debates, multiple institutional venues may simultaneously work on the same issue. Interest group activity equally spreads over these multiple venues at the same time. This thus leads to the expectation that EU interest group politics *is not confined to one institutional venue but takes place in multiple venues at the same time.*

Policy issues are discussed by stakeholders using frames. In frames, the policy issue and the information stakeholders provide based on their own interests, are combined. This is the 'image' of a policy issue (Baumgartner, 2006, p. 26). Interest groups may want to get (more) attention for their policy image, if a dominant frame they oppose persists. They can choose to discuss this within the policy subsystem or form another policy subsystem around the same issue (Cairney, 2012). In contrast, when they are happy with the status quo, they will stay where they are (Baumgartner et al., 2014). Thus, how the policy process evolves, depends on whether

the status quo or its alternatives are given attention by the stakeholders that are involved. Interest groups choice where and when to be active, is not isolated to a specific stage in the policy's legislative cycle. Instead, it is based on how the debate on a policy issue evolves. Therefore, activity of interest groups can be expected during the full legislative cycle of a policy, or even starting earlier or finishing later. This leads to the expectation that interest group politics is not confined to one institutional venue but takes place in multiple institutional venues at the same time, *irrespective of the stage the policy is in.*

Hypotheses about EU interest group politics

This study aims to test the explanatory power of Punctuated Equilibrium theory by applying it to interest group politics in an EU context. Of the research avenues of EU interest group politics, this study will focus on the mobilization and the framing of interest groups (cf. Klüver et al., 2015). The influence of interest groups will not be investigated in this article for multiple reasons. First, because the conceptualization of EU interest group scholars and Punctuated Equilibrium of interest group influence differs substantially. EU interest group scholars typically take two points in time based on the stage the legislation is in and ascribe the differences between the two to stakeholders' efforts to influence the respective policy file (cf. Dür, 2008; Klüver, 2013; Rasch, 2018). Thus, influence is the extent to which a legislative text is changed and to which interest group, or coalition, this can be attributed. Opposed to this, Punctuated Equilibrium theory operationalizes how policies change in terms of budgetary differences between two points in time (Baumgartner et al., 2009). It can be questioned whether Punctuated Equilibrium theory is at all interested in attributing influence to one interest group or another (cf. Baumgartner et al., 2009, pp. 251-252). Thus, it is theoretically not very meaningful to compare the two. Also, there is a methodological difference between the ways in which EU interest group scholars and Punctuated Equilibrium scholars study influence, and the methodological design of this study. This article is a single case study and covers a period of

1,5 years. In contrast, to determine the influence or success of interest groups, both perspectives require large-N research that encompasses multiple years. The difference in methodological approaches further justifies the choice not to include influence in this study.

Table 2 below shows the hypotheses for both the aspects of EU interest group politics that will be investigated in this study.

Table 2: Expectations for EU interest group politics according to Punctuated Equilibrium theory

No	Hypothesis
1 _{HA}	Interest group mobilization is not confined to one institutional venue but spreads to multiple venues at the same time irrespective of the legislative stage the policy is in.
2 _{HA}	Interest group framing is not confined to one institutional venue but directed towards multiple venues at the same time irrespective of the legislative stage the policy is in.

The legislative perspective: a straw man?

An important objection needs to be dealt with first, before proceeding to the method section. One could argue against this study that it makes a straw man of the EU interest group literature. This, by implying that its scholars genuinely think interest group politics takes place within a single institutional venue and can only be studied within an isolated policy stage. In contrast, these critics would say that EU interest group scholars are well aware of the complexity of the EU’s political system. Besides, they do not claim that the legislative perspective is empirically the only correct view. It is simply a way to operationalize how EU interest group politics are active in the EU policy process. Indeed, this article argues that many scholars have adopted a too limited perspective on the policy process in studying EU interest group politics. However, it is not true that this article suggests that scholars made this choice, just because they are too stupid to understand that the empirical reality is more complex than characterized by the legislative perspective. Mostly, the EU interest group literature built upon legislative perspective assumptions for data availability reasons (e.g. Berkhout et al., 2018; Rasch, 2018), or because the operationalization always limits the research in some way (e.g.

Klüver, 2013). Thus, there are understandable reasons for picking the legislative perspective. However, the critique on the EU interest group literature that this article gives, is that the dominance of using a legislative perspective, leads to disregarding important aspects of how EU interest group politics unfold in practice. This article offers an argument and a set of expectations that show a legislative perspective is not the only way to theorize the EU policy process, select the case(s) and choose the data.

Methods

Case selection

The case selected is the Framework Programme [FP] 9, called 'Horizon Europe', which will succeed the prior FP 8, Horizon 2020, in 2021. This EU policy programme is one the Commission's more substantial policies with regard to its budget (Reillon, 2017). Therefore, it consists of multiple policy issues and attracts many stakeholders, among others interest groups, that want to secure their interests in the new programme. The significance of the policy is a necessary condition for the case selection, as this study aims to test the explanatory value of Punctuated Equilibrium theory within a single case study, requiring the collection of in-depth data (Gerring, 2007) to decide upon the explanatory power of the two theoretical perspectives (cf. Blatter & Haverland, 2014). Prior research of EU interest group politics focused mainly on topics like environment, consumers' rights and health, and agriculture (Bunea & Baumgartner, 2014, p. 1432). Selecting this case, a policy in the domain of Research and Innovation, diversifies the research field and strengthens the theoretical validity of what is known about EU interest group politics.

Figure 1 depicts the selected case and its legislative context. This shows that the timeframe in which this case is studied, runs from January 2017 to August 2018. The first parameter follows from the adoption of the “Communication on the interim-evaluation of Horizon 2020”. This evaluation marks the start of debating the content of FP9, as confirmed independently by the interviewed experts (Interview A, E, F, G, I, J). The end date will be the 31st of July. This, as the Commission published its proposal for the new FP on June 7th (European Commission, 2018). The end of the month will be picked, as for various reasons the publication date of some of the stakeholder documents is in July.

Figure 1: Overview case study and legislative context of Horizon Europe



Note: This figure is based on interview data and the Commission website (2019).

Operationalization core concepts

Interest group mobilization, defined as “*displaying political activity*” (Binderkrantz et al., 2016; Varone, Gava, Jourdain, Eichenberger, & Mach, 2018), is operationalized in this research as the activity of an interest group to have published one (or multiple) position papers on Horizon Europe in the period January 2017 till August 2018 in one or more of the databases of stakeholder documents. In addition, the usage of the political frame in stakeholder documents will be analyzed. This frame indicates to which institutions interest groups want to display political activity (see table 3). These two indicators combined allows to say which interest group displayed political activity and in relation to which institutional actors they mobilized.

Strategies are understood in terms of framing, or the activity to “*strategically highlight some aspects of policy proposals while ignoring others to shape policy debates in their [interest groups’] favour*” (Klüver, Mahoney, & Opper, 2015, p. 482). Rasch (2018) has operationalized these strategies of framing in a set of twenty codes (see table 3 and appendix IV). In this study, these frames will be specified per policy issue, as the Horizon Europe policy programme comprises multiple policy issues.

Table 3: Explanation of frames

Frame name	Explanation
Diagnosis	What the policy problem is, what has caused the problem, who is responsible for the policy problem and who is harmed by this.
Prognosis	Which solutions are offered, answering the questions, what it is that should be done or what should not be done and who should do it or stop doing things because he or she has competences in doing so.
Legal	References to existing laws and regulations, at European and national levels, like EU Treaties or previous and therefore existing laws, regulations and directives.
Economic	About cost-benefit calculations, or addressing the interest of a specific constituency, supporters or members but also financial impacts and consequences.
Moral value-based	Deal with universal principles (democracy, justice, equality, transparency subsidiarity, proportionality), international obligations (EU Treaties, Kyoto Protocol), commonly shared goals (such as common European currency, reduction of CO2 emission, achieving of Common European Market sustainability), norms (universal ethical values), as well as discriminatory aspects, based on fairness or the EU Anti-discrimination policy.
Consequences	Consequences, from social and financial to environmental or health related impacts.
Expert knowledge	Referring to evidence generated by experts or in expert groups, through scientific studies or the reference to elites’ statements, like presidents.
Feasibility	Technical (in terms of infrastructure, personnel and expertise), legal (conform with legal requirements), financial feasibility (financially affordable) or the lack of feasibility.
EU-level	European level information, regarding the interests of the European public or the European economy or the competences of the European decision-makers.
Coalition	Quotes and or paraphrases of arguments by other actors.
National	National level information, regarding national interests of the EU member states.
Technical	Technical specifications and details of an aspect in a bureaucratic, academic / scientific or in-depth technical manner.
Positive	Positive references to either certain actors involved (e.g. giving credit to the EC) or to aspects of the proposal, which are presented in a positive light.
Bridging	Linking of different policy areas, issues or problems.
Transformation	Change of old understandings and meanings into new ones or the generation of new ones in general. <i>This frame was not considered in the document analysis, as</i>

it requires more context than textual context alone to determine whether there is a transformation of old and new meanings.

Counter	If the stakeholder disagrees with an existing frame of another stakeholder and directly refers to this frame.
Negative	About negative references to either certain actors involved (e.g. giving blame to the EC) or to aspects of the proposal, which are presented in a negative light.
Motivational	Call to arms or collective action.
Emotional	Usage of language that is emotionally loaded and emotions and feelings are at the core of the statement or can read in-between the lines.
Political	References to political support, including political expertise in the sense of electoral support.

Note: Summary of main elements of the frames (based on Rasch, 2018). See for full codebook, the changes to fit the analysis to this study and the reasons, Appendix IV.

Data collection, quality and analysis

The data for this study comes from two sources: expert interviews and interest group documents. The experts that were selected, spent a considerable amount of their time in the last 1,5 years to the Horizon Europe file. Nine experts were interviewed (response rate of 53%). Seven were lobbyists on EU level and two were active on the file in other positions and frequently in contact with the EU interest groups.¹ The sample encompasses experts with various backgrounds and type of interests. The interviews themselves were semi-structured and analyzed using open coding (Benaquisto, 2008). Expressed in inter-expert reliability, the extent to which experts agree about factual aspects, there was general agreement concerning the relevant mobilized interest groups and the most important issues that were discussed about the new FP (Dorussen, Lenz, & Blavoukos, 2005). This ensured the reliability of the experts (Beyers, Braun, DeBruycker, & Marshall, 2014).

The stakeholder documents, or ‘position papers’ of interest groups that were active on the Horizon Europe file, were retrieved from three main data bases² that collected position papers published about Horizon Europe after 1 January 2017 leading up to the Horizon Europe Commission proposal (see appendix II for full overview). 83 unique documents were retrieved

¹ The interviewees and their organizations have been made anonymous. This measure was taken due to the confidential nature of their work and the fact that the Horizon Europe file is currently still in negotiation. Appendix I provides further description of the interviews.

² These consists of the Czech Liaison Office, ERA Portal and Science Business.

of which 68 remained. The selection was based on language (only English), timing (within the aforementioned period), type of actor (interest groups only, no government papers) and type of publication (exclusion of press summaries, and more general papers if more suitable alternatives were available).

A qualitative content analysis was used for the stakeholders’ documents. The coding set was based on Rasch (2018), as table 3 summarizes. Appendix IV provides a more extensive overview of the procedure. The complete text of each documents has been coded, recording a frame for each text passage. The context unit of the text passage depends on the structure of the individual document but comprises five lines maximum and a single sentence as a minimum (Krippendorff, 2004, p. 102). The amount of text that is included in recorded frames similarly depends on the structure of the document but will comprise of multiple lines, or various sentences to secure reliability of the coded sections (Krippendorff, 2004, p. 100). To further secure reliability, this study uses a coding set applied and tested in a comparable document analysis (Rasch, 2018). Last, the measured frames were triangulated with data from the expert interviews.

The mobilization and frames of EU interest groups for Horizon Europe

The aim of this study is to investigate the mobilization and strategies of interest groups during the Horizon Europe policy process. By approaching the policy process from a Punctuated Equilibrium theory perspective, it has been argued that theoretically, the ‘when’ and the ‘where’ of interest group politics could be more adequately explained. This analysis shows to what extent the analyzed documents and interviews confirm this hypothesis. The expectation will be tested by discussing the mobilization of interest groups during the period 1 January 2017 till August 2018 of the Horizon Europe policy process. After that, the frames used by the interest groups to bring forward the policy issues of Horizon Europe, will be covered.

Mobilization in an institutional void

Hypothesis 1: Interest group mobilization is not confined to one institutional venue but spreads to multiple venues at the same time irrespective of the legislative stage the policy is in.

Mobilization has been defined as the extent to which interest groups display political activity. It has been investigated how this connects to the stage of the policy proposal and the institutional venue to which the activity is directed. Figure 1 demonstrates that within the selected case parameters (the time period January 2017 till August 2018), there were no official consultations by the Commission on Horizon Europe. Besides, the Parliament had not yet been given the formal role to comment on the policy issues. The draft reports of the Parliament rapporteurs were only discussed in the beginning of August and September 2018. During the 1,5-year time period, over sixty interest groups showed political activity by publishing one, or even multiple, position paper(s). The occurrence of these documents, i.e. political activity, outside of an official Commission consultation shows that the mobilization of interest groups is not confined to a single stage of the policy proposal.

From the interviews it can be concluded that the Council, national governments and the Parliament were addressed at the same time as the interest groups sought contact with the

“This [lobbying on the new Framework Programme] is playing chess on multiple boards at the same time and think several steps ahead.”

(Translation from Interview E)

Commission (Interview D, E, G, J). The quote of respondent E confirms this as it shows that the receivers (i.e. ‘chessboards’) of interest group messages range from other interest groups to the Commission, the Parliament and national government officials, at the same time. Furthermore, coalitions were made within the interest group community to convey a stronger message to the above mentioned political actors (Interview J). A coalition of fourteen network federations of European universities (document 25) and a business coalition of the largest industry federations (document 50) published a short but powerful statement addressing the Commission, Parliament and Council. This substantiates the claim that the mobilization of interest groups

goes beyond a single institutional venue. The activity of EU interest groups is meant to be displayed in multiple institutional venues.

The document analysis confirmed this. The political frame, meaning “explicit references to public or political support” (see appendix IV), that was used in 31 of the documents often did not confine the political actor to the European Commission. Some documents mentioned the Parliament, the Commission and the Council explicitly (documents 11, 26, 40, 43, 50, 53, 55). In some cases, also national governments or ‘member states’ were included (documents 9, 11, 25, 26, 29, 34, 47, 76). Others terms used were ‘European policy-makers’ or ‘European decision-makers’ (documents 10, 17, 18, 24, 26, 27, 52, 55, 81). The textbox illustrates this. It shows the political frame of LERU, which represents a substantial number of European universities.

“LERU is looking forward to discussing the ideas set out in this paper with the European Commission (EC), members of the European Parliament and Council representatives. LERU will engage with the European institutions, providing suggestions and comments, in every step of the development of FP9.”
(Document 43, p. 3)

LERU’s document is published in June 2017. Though according to the legislative process, the Parliament and the Council are not yet involved, the document mentions that LERU wants to engage with all these institutional actors. Also, it is emphasized that it will do so “in every step” of the Horizon Europe process. This confirms that there is mobilization towards multiple institutional venues and that this is understood by LERU to be irrespective of the stage the policy is in.

Thus, mobilization of interest groups is not confined to the official consultation period of the Commission only. Furthermore, the interviews showed how the political activity of EU interest groups was directed towards multiple institutional venues. Given the fact that the Commission’s proposal was not even published in the period the documents were written, this offers strong support that interest group mobilization is more extensive than a single point in time within a single institutional venue. Thus, the data supports the hypothesis. It can be

concluded that interest group mobilization in the case of Horizon Europe is not confined to a single institutional venue but spreads to multiple venues at the same time irrespective of the stage the policy proposal is in.

Framing: nothing new

Hypothesis 2: Interest group framing is not confined to one institutional venue but directed towards multiple venues at the same time irrespective of the legislative stage the policy is in.

As framing and mobilization are closely connected to each other, it is helpful to recall how they link. Interest groups show political activity, i.e. mobilization, and do so by highlighting policy issues in such a way that it fits their interests, i.e. framing them. To answer the framing hypothesis, zooming in to concrete policy issues is required. The framing of three policy issues of the Horizon Europe case study will be explained in detail below (see appendix III for overview of all policy issues): total budget, missions and widening. The selection of these issues is based on the frequency in which they appear in the documents, triangulated with prioritization by interviewees. The issues of the total budget and the missions were most frequently covered in the stakeholder documents (both occurred in 54% of the documents) and confirmed by the interviewees (C, D, F, G, I, J and D, F, J respectively). Widening was added as it was a ‘hot potato’ for Council and Parliament (interview A). The topic was mentioned frequently in the interviews (A, B, C, F, G, J). The importance of excellence was considered by interviewees as an alternative way of how interest groups highlighted this issue (Interview B, C, D, J). Though in the document analysis, widening was not among the most frequent topics (22%), 86% of the documents mentioned the topic of excellence. Therefore, widening is included as a third policy issue.

Total budget for Horizon Europe

Horizon 2020, the predecessor of Horizon Europe, has a budget of around 80 billion euros (Reillon, 2017, p. 24). According to the interviewees, the broad EU interest group population,

from lobbyists for academic interests to business representatives, called for a higher budget for Horizon Europe (Interview B, D, F, G, J). The stakeholders proposed doubling the figure, or at least increasing the total budget to 120 billion (Interview F, J). The document analysis confirms framing of the budget issue, as table 4 depicts. 19% diagnosed the total budget’s current (i.e. of Horizon 2020) amount as a problem. Furthermore, the solution of raising the budget to 120 billion or doubling it, is apparent in 16% of the documents. This is in line with what the interviewees suggest about the higher budget. The document analysis further showed that to convince the receivers of this stance, the EU and consequences frame are used. In brief, with the EU frame, stakeholders argued that a future EU needs a larger budget going to research and innovation. The consequences frame highlighted that not investing sufficiently in research and innovation could lead to less jobs and prosperity.

Table 4: Overview most frequent frames on the policy issue of the total budget in the documents

Frames	Frequency in %	Summary of argument
Diagnosis	19	The budget is not large enough.
EU-frame	17	Consequences for EU if budget is not increased are undesirable. An increase in the budget will have a positive impact on EU and its issues.
Prognosis	16	Budget figure should go up: doubling of Horizon 2020 budget or at least substantial increasing.
Consequences	11	Consequences e.g. economic or social of not investing sufficiently (without reference to EU).
Coalition	8	References to the total budget stance of High Level Group or Parliament report mostly.

The call for an increase did not originate from the EU interest group community only (interview D, F, J). The European Parliament’s report from June 2017 also called for this increase. A month later, this was also echoed by the High Level Group that published the report ‘LAB-FAB-APP’ in July 2017. This group of experts was requested by the Commission to provide advice on the state of research and innovation in the EU (Interview A). Both from the Parliament as well as from the High Level Group, the policy issue of the total budget was framed, and similar arguments of prognosis and diagnosis frames were used as in the interest

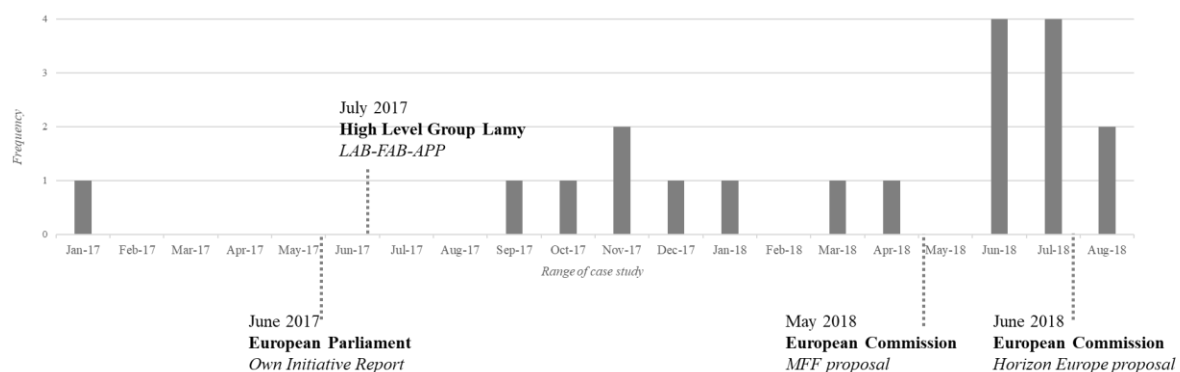
Rethinking the ‘where’ and ‘when’ of EU interest groups

group documents (compare interview D, F, J with table 4). This is further confirmed by the coalition frame, used in 8% of the documents. Stakeholders explicitly referred to the two reports. The textbox provides an example of such a coalition frame on the policy issue of the total budget. This coalition frame further strengthens the claim that interest groups and various institutional actors shared similar frames.

“To this end, we would like to join the voices within the European Parliament, Pascal Lamy’s High Level group recommendations and many other stakeholders to call on the European Commission, European Parliament, and the Council of the EU to increase the future budget of “Horizon Europe” to a minimum of €120 billion.”
(Document 20, p. 1)

Figure 2 displays how, in the period from January 2017 till August 2018, these concerns were voiced in the documents. The budget of Horizon Europe had been proposed by the Commission in April 2018 in the Multi-annual Financial Framework. After that, it was primarily the Council and the Parliament that would be discussing this proposal (European Parliament, 2019; cf. European Parliament Think Tank, 2018). However, interest groups continued to highlight the issue of total budget: ten papers were published in the three months after the publication of the MFF proposal. Therefore, from the figure 2 visualization, it can be concluded that interest groups frames on the total budget were not confined to the single policy stage of the Commission’s proposal.

Figure 2: Documents on total budget and their publication date (in months) and the time scale of relevant publications from EU institutions



Note: Based on own data (appendix II) and figure 1.

Thus, the call for a higher budget was not confined to a single institution. Rather, it trumped the institutional borders of the Commission. Stakeholders from Parliament, the High-level group and the EU interest community were, at the time the Commission was working on

a figure for the budget, expressing themselves in similar terms. Therefore, the frames of EU interest groups were observed in the case irrespective of both institutional venue as well as policy stage.

Developing missions

The American mission to get to the moon before the Russians was the example that Commissioner Moedas, who has the political responsibility for Horizon Europe, used when he pushed for the idea of ‘missions’ in Horizon Europe (Interview I). The rationale is that such an appealing and concrete ‘mission’ proves what investing public money into research can bring to society (Mazzucato, 2018). Missions were a new Commission idea that translated a shared conviction of the interest group community and the Commission, namely to better connect the FP with citizens, into a policy proposal (Interview J). The document analysis confirms that this belief was shared among the EU interest groups. Table 5 shows how the prognosis and diagnosis frame were frequently (27% and 22% respectively) used to argue in favor of (strengthening) the connection between society and the FP.

As mentioned above, the concrete translation of this debate into ‘missions’, was new. There were so many things unclear about these missions that it led to a situation where the EU interest group community put in a lot of effort to develop more specifically what these ‘missions’ would look like (Interview C, G, J). As 27% of the references was framed in a prognosis frame, proposing a solution, the document analysis confirmed this. Solutions that were offered varied from specific suggestions on how to realize this on a project-level, as the first textbox below shows, to more general recommendations on how the process should look like, as the second box illustrates. Also, a moral value-based frame was used, in 11% of the references as table 5 shows, for example by emphasizing the need of democratic and just societies and the role the FP had to play in reaching that goal (Document 38, p. 4).

“citizen science: For relevant missions, co-production should be embedded within the project; project applicants should involve, where relevant, societal stakeholders in the project-development phase and describe in their proposal how the input collected has been taken into account and translated into the specific research questions.”
(Document 60, p. 4)

“BusinessEurope acknowledges the attractiveness of missions but emphasises the importance of clear and strong links with the whole Framework Programme. Also, industry should be strongly involved in co-designing these missions.”
(Document 10, p. 4)

Thus, the rationale behind the missions proposal was not confined to the Commission. It tapped into a broader frame which also the interest group community used (Interview J). Interview J underlines that these frames shared between Commission and interest groups, go back to the period before the lobbying process for this FP had started (Interview J; see document 15, p. 1). Therefore, missions were not confined to a single policy stage. The frames interest groups used and that were shared by the Commission, originated back from a broader status quo before the Horizon Europe legislative cycle started.

From interview A it becomes clear that the idea of missions was also given substantial emphasis by the Commission, to convince the national ministers of the importance of investing in the Framework Programme (cf. Mazzucato, 2018). Thus, besides its conviction to better connect the FP to society for citizens’ sake, there was a political goal of the Commission to convince the national governments and Council of the relevance of the programme (also see interview G). One stakeholder document contained evidence hereof. Using a political frame, it was underlined that the conviction to better connect citizens and the FP was shared by Parliament and Council, referring to publications of these institutions (document 15, p. 1). So, multiple institutional actors were active on the mission topic at the same time. Both interest groups as well as EU institutional actors shared similar frames within the case study time parameters. Therefore, the debate about the policy issue, was not confined to the Commission only. Interest groups directed these frames towards other political institutions as well.

Table 5: Overview most frequent frames on the policy issue of connecting with citizens in the documents

Frames	Frequency in %	Summary of argument
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Prognosis	27	Connecting with citizens is important to improve the Framework Programme.
Diagnosis	22	Currently, investing in the FP is controversial as its justification lacks the backing and the attention of citizens and society
Consequences	12	The potential of better connecting citizens and society with the FP, such as social benefits.
Moral value-based	11	The FP needs to be connected to society in the pursue of the UN Sustainable Development Goals, or ‘global challenges’.

In sum, the shared frames between Commission, EU interest groups and other EU institutions show that the policy issue’s coverage is not confined to a certain institutional venue. There have been some data that suggest that the issue also originated from before the Horizon Europe policy process. This means that the issue is also not confined to a certain legislative stage the policy is in.

Widening

Instead of funding ‘the best’ proposals to research calls with the Framework Programme funds, the term ‘widening participation’ is used to underline (proposed) measures to ensure a higher participant rate from EU-13 countries, which are the Member States that have less developed economies (Interview A, C, D, F, J).³ Currently, this rate is at 4%. There is pressure from some EU countries that there should be a more geographically equal participation rate. This clashes with the idea of other Member States, from the EU-15, that only excellence and quality should be used to select participants, despite country of origin. Interest groups, from academia and business, share the same position of the EU-15 countries, underlining that excellence should be the guiding principle in the Framework Programme (Interview B, C, J). Table 6 shows the results of the document analysis. The common position is illustrated with the diagnosis frame which is about the idea that there is a participation gap. The use of the prognosis frame on the widening issue indicates that the solution interest groups propose for the widening

³ EU-13 countries are: Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia, Malta, Cyprus, Bulgaria, Romania and Croatia (Pazour et al., 2018, p. 18).

is to keep focusing on quality. This, in accordance with the EU-15 Member States opinion. This is illustrated by the quote below.

The consequences frame displays that the interest group population believes the focus on

“Consortia should be evaluated on the basis of the quality of their proposal alone. No project should be turned down because it does not include partners from better-known institutions or from a specific region.”
(Document 43, p. 21)

excellence will lead to an ever more successful Framework Programme. This argument is used to further underline the importance for the EU interest group community.

Table 6: Overview most frequent frames on the policy issue of widening in the documents

Frames	Frequency in %	Summary of argument
Prognosis	27	Policy instruments need to be focused on excellence of participants.
Diagnosis	24	Participation of Member States is not equal. There is a gap between those performing better and those countries that are doing worse in the FP.
Consequences	11	Right use of widening instruments will lead to a system that is more excellent (and members).

In the European Parliament and between the national governments in the Council, widening is a continuing issue in the period leading up to the Horizon Europe proposal (Interview C, D, F, G, I). The interviewees (C, D, F, G, I) stress how in this debate European Parliament and Council are discussing the issue when, at the same time, the Commission is working on the proposal. The document analysis demonstrates that the EU interest group community is also active in this period. It shares similar frames on the issue, about excellence as participation criterion, with the Council. It can therefore be concluded that this issue is not confined to a single institutional venue for EU interest groups. EU interest groups frames are directed towards the Council in the period the Commission is working on the proposal.

Further, the question how to divide EU money and what the role of the Framework Programme is, has been asked in previous Framework Programmes (Interview C, F). This indicates that EU interest group frames are not only directed to multiple institutional venues at the same time. On top of that, the interviews lead to the conclusion that interest groups are also

active directing their frames towards political actors irrespective of the policy stage. This is the case, because the issue comes up in multiple ‘lobbying cycles’ in past Framework Programmes (Interview C).

Summary policy issues hypothesis 2

Table 7 summarizes the outcomes of the policy issues that have been covered. The policy issues were framed by interest groups in multiple institutions at the same time. Also, these frames were not only confined to the current policy stage (cf. figure 1 and 2) but originated from before that. Some of the policy issues that were analyzed were part of debates that even trumped 1) a single legislation (e.g. also involving budget discussions or political debates about dividing the EU money) and 2) a single policy cycle (debates about the budget and the call for stronger links between citizens and the FPs). Therefore, though the amount of data supporting the hypothesis per policy issue differs, there is sufficient evidence in all three cases that interest groups are active in multiple institutional venues at the same time irrespective of the legislative stage the policy is in.

Table 7: Results hypothesis 2 per policy issue of Horizon Europe

Policy issue	Result (rejected or confirmed)	
	Multiple institutional venues	Irrespective of policy stage
Total budget	Confirmed	Confirmed
Missions	Confirmed	Confirmed
Widening	Confirmed	Confirmed

Conclusion: towards a more fine-grained approach to EU interest group politics

The conceptualization of the policy process is often ill-defined in research into EU interest group politics. This article has tested an alternative perspective, asking: What is the power of the Punctuated Equilibrium perspective of the policy process in explaining interest group mobilization and framing in an EU context relative to a legislative conception? Tables 6 and 7 confirm that the ‘where’ and ‘when’ interest group activity is more congruent with a Punctuated Equilibrium theory perspective. This confirms the central question.

The main lesson that can be drawn from this study, is that future research of EU interest groups should pay sufficient attention to the conceptualization of the policy process and include research expectations beyond isolating interest group politics within a single institution and a single legislative phase. This cannot be achieved through a more diverse data collection only (cf. Berkhout et al., 2018). Using a different perspective on the policy process to study EU interest groups adds to a better understanding of the empirical reality of the complex political system of the European Union (Eising, 2016; Hooghe & Marks, 2010; Kohler-Koch & Finke, 2007). This study has shown, by highlighting two underestimated aspects of the EU policy process: the 'when' and 'where' of interest group politics, that Punctuated Equilibrium theory enables to better grasp the multi-faceted reality of the European Union political system. Through these recommendations, this article contributes to further theoretical refinement of the EU interest group research field, which is a necessary condition for advancement (Eising, 2016, p. 3).

This article contributes to developing Punctuated Equilibrium theory, strengthening its theoretical validity, as the theory is not only confirmed for large-N research in a US context (cf. Baumgartner et al., 2009). The theory also proves itself in a different political system, and in a small-N study (cf. Baumgartner, 2006, p. 31; Green-Pedersen & Princen, 2016, p. 83; Repetto, 2006). This large-N and small-N relationship is the biggest challenge for EU interest group scholars. Single case studies are weak with regard to external validity. The danger is that these studies, though descriptively very thorough, have little to say about EU interest group politics more generally (cf. Bunea & Baumgartner, 2014, p. 1432). As large-N research is common in an EU context and extensive data sets available (e.g. through the research group INTEREURO), further research using Punctuated Equilibrium theory, should apply the rationale of this study to large-N investigations in an EU context. This would allow EU interest group scholars to make more generalizable statements about the complex reality of the policy process and its

connections with interest group politics, strengthening the external validity of this case study (cf. Varone et al., 2018, p. 18).

As it does represent an impressive part of the EU interest group literature (see Klüver et al., 2015), not testing the worth of Punctuated Equilibrium theory for EU interest group influence is a serious limitation of this research. Though it has been argued why this choice has been made, it is a worthwhile extension for strengthening the explanatory value of Punctuated Equilibrium theory in an EU context.

The position and functioning of interest groups in an EU context is far from controversial, as recent public debate shows (Baume, 2019). Scholarly research can add to better understanding the EU political system and that way provide input to the debate. However, this needs to be done with caution. Rinus van Schendelen (2013, p. 115) argues how 'naïve academics' understand the practice of EU lobbying in limited terms. Whereas he only explains this statement in a couple of lines, this study has given this statement more body. In short, the complexity of every-day practice cannot be isolated within a specific legislative stage or institutional venue. Therefore, it is crucial for EU interest group scholars that want to contribute to the public debate, to be aware of empirically imprecise judgements. This way, academics will come to a better understanding of the professional practice of EU lobbyists, and may through their publications work on a transparent and accountable European Union.

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