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Piemonte Region in Brussels: between lobbying and policy dialogue

The case of regional interest representation on the future of EU Cohesion Policy beyond 2020

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Chapter 1. Introduction

“A Europe of, with or for the Regions?”

The paradox of regional Europe is that whilst the ‘Europe of the Regions’ concept fails to provide an accurate reflection of current power relationships within the EU, appropriate and effective engagement in the EU remains a fundamental objective of all regional actors across the EU”
– Moore 2008, 517 -

Over the last quarter of a century, regional authorities from all over Europe have increasingly mobilized at the EU level. One of the most evident form of this engagement has been the proliferation of regional representation offices in Brussels (Beyers and Donas 2014; Tatham 2013, 64; Tatham and Thau 2013, 257). This has turned into an increasingly institutionalized channel of regional engagement in EU affairs and, currently, over two-hundred regional liaison offices can be found in the city close to the EU institutions (Moore 2008, 519; Greenwood 2003, 10).

The proliferation and persistence of regional offices at the heart of Europe raises a number of compelling questions affecting the multilevel governance approach as well as the theories on interest groups’ lobbying within the EU. This phenomenon constitutes, in fact, an institutional puzzle within the EU formal political order: regional delegations have no official status in Brussels, are not mentioned in the Treaties and do not enjoy any precise formal role in the legislative process (Greenwood 2011, Huysseune and Jans, 2007). The magnitude of Regions’ efforts to establish and fund offices in Brussels is, therefore, surprising (Marks et al. 2002, 1).

This peculiar form of regional engagement in EU affairs has attracted a lot of academic interest, especially in the context of the multilevel governance approach. These researches have mostly focused on the determinants of subnational mobilization at the EU level looking at the effects of European integration for regional authorities and investigating the competitive dynamics between regions and Nation States (Ibid., 6). However, while the

representations in Brussels are said to represent significant channels for regions to participate in the EU supranational policy-making (Callanan and Tatham 2014, 191; Moore 2008a, 518; Tatham 2008, 493), little research has been dedicated to investigating how these offices lobby the EU institutions in practice.

Moreover, within the framework of interest representation literature, the lobbying conducted by regional authorities has, so far, been largely overlooked (Tatham 2017, 1103). As a consequence, contrary to what has happened for private sector actors, the study of regional lobbying at the EU level is a relatively young and still underdeveloped discipline (Figuee et al. 2016). This is regrettable since a scientific study of the way regional authorities defend their interest in the Brussels arena influencing the EU decision-makers would be of particular relevance from an academic as well from a societal point of view (Ibid., 27).

The objective of this research will be to contribute to the understanding of the lobbying carried out by regional offices in Brussels. For this purpose, a close investigation of the interest representation activities of a specific regional delegation will be conducted. The subject of this study will be the Piemonte Region office in Brussels and the analysis will provide a detailed and critical account of its lobbying practices. Examining the strategies employed by Piemonte to represent its interests vis a vis the European institutions through its Brussels office will result in a more realistic, grounded and critical understanding of the EU multilevel lobbying arena where European regions are striving to consolidate their role.

The central research question that will orient the study is the following: How does the Piemonte Region office in Brussels lobby the EU decision-makers? A number of sub-questions, regarding the office's features, resources, lobbying partners, strategies and targets, will be elaborated in the following chapter on the basis of the review of the academic theory on regional mobilization and on interest groups' lobbying in the EU. As will be described in more details in Chapter 3, the empirical investigation will be based on a mixed qualitative research method, combining: observation through first-hand participation in the Piemonte's lobbying activities, interviews with the regional policy officers working in Brussels and document analysis.

The research question will be answered with a specific focus on the lobbying activities surrounding the European Commission's proposal for the next EU Multiannual Financial Framework¹ especially with regard to the future of Cohesion Policy after 2020. This policy, having the objective of reducing disparities across European regions, is, currently, the largest EU investment instrument corresponding to a third of the entire Union's budget (ESI Funds 2018). Being the most salient EU policy from the perspective of regional administrations across Europe (Marks et. 2002, 15; Kölling 2015), Cohesion is also the most appropriate to investigate regional lobbying strategies in Brussels.

Over the course of the debate on the next EU budget, serious and motivated concerns emerged that Cohesion Policy's scope and financial endowment were about to be drastically reduced after 2020 (Margaras 2018; Huguenot-Noël et al. 2017). As the future of the EU Regional policy appeared very uncertain, during the months ahead of the Commission's Budget proposals of May 2018, many regional authorities, among which Piemonte Region, mobilized engaging in several collective lobbying actions in Brussels. The aim of this initiatives was to safeguard, as much as possible, adequate funding for Cohesion Policy after 2020 and put forward proposal for its reform. The policy process leading to the EC proposals for the next EU budget and for the next generation of Cohesion Policy regulations represents, therefore, the perfect case to observe Piemonte's lobbying in action and to analyse its interest representation tactics in Brussels.

Thanks to this case study, besides the described theoretical value, this research will also entail a specific societal interest. Firstly, investigating the existence of a multilevel policy dialogue between the European regional authorities and the EU supranational institutions is relevant for assessing the democracy and legitimacy of the EU decision-making processes. This is of particular importance when the decisions at stake are likely be very consequential for the future of European Union and have far reaching concrete consequences for each European citizen. This is the case for the debate over the next EU budget, which will orient the direction of the Union for the next seven years. In this regard the effective involvement,

¹ The Multiannual Financial Framework is (MFF), also known as the financial perspective, is a 7-year framework regulating the European Union annual budget. The current MFF covers the period between 2014-2020 and the Commission in May 2018 has put forward a proposal for the 2021-2027 MFF which will have to be adopted unanimously by the Council with the consent of the European Parliament.

during the negotiations, of a broad range of stakeholders allowing for different voices to be heard is a key political and societal issue.

Within this process, the thesis, will explore how Piemonte, in its role as intermediary between the territorial concerns and the supranational level, participates in the EU multilevel decision-making by means of lobbying activities. The effective participation of Regions, as public authorities closer to the citizens' concerns, could contribute, indeed, to enhance the quality and legitimacy of EU legislation while ensuring the necessary citizens' engagement in the future of the European integration project (Dür and Mateo 2012, 969).

Finally, this study will also have practical implications for the organization under study. Piemonte Region administration will gain insights on how its Brussels office enhances the regional participation in the EU policy processes. The research will also highlight strengths and weakness of the way the Piemonte regional presence in the "capital" of the EU is currently organized. Moreover, the research findings will be translated into strategic choices for the organization by developing concrete recommendations to improve the lobbying conducted by the Piemonte Brussels office.

1.1. Operational definition of the concept of "Region"

Having introduced the research context, relevance and objectives, before commencing the analysis, it is necessary to precisely define the unit of analysis of this study. The term "Region", if not properly defined, can, in fact, result ambiguous as it is commonly used with reference to various entities placed at different spatial scales (Plangger, 2018). For the purpose of this research, I will, therefore, refer to EU Regions as: *"substate entities with single, continuous, and non-intersecting borders, situated on the highest level below the state level, and endowed with legislative, executive and/or administrative institutions"* (Huwyler et al., 2018, 760). While this definition contributes to clarify the notion of Region, it does not address all the potential misunderstandings. In fact, each EU country has a different way of dividing its territory and across the various Member States the first subnational administrative unit is not always labelled "Region".

To address the need for a single, coherent and stable system for dividing the Union's territory, the *Nomenclature of territorial units for statistics* (NUTS) has been developed by Eurostat (Regulation 1059/2003, 2013). This is a hierarchical system dividing the EU territory between three levels of sub-national governments for the purpose of collecting harmonized regional statistics and conduct analysis for the application of regional policies. In particular, the level of NUTS 2 defines the Regions eligible for support from Cohesion Policy (Eurostat 2015). These will be the unit of analysis of this research and, in the following, the term Region will be used with reference to the NUTS 2 classification (See. Annex 1: *Maps NUTS 2 regions EU-28*).

1.2. Reader's guide

The rest of the thesis will be structured as follows:

Chapter 2 will be dedicated to outlining the thesis' theoretical framework based on an extensive review of the academic literature on regional delegations in Brussels combined with the studies on interest groups' lobbying in the EU. This theory-building exercise will allow to develop nine sub-questions to operationalize the central research question and to guide the empirical investigation.

In chapter 3 the methodological design of this study will be developed discussing and providing justifications for the research strategy and the data collection methods employed. The chapter will also present and explain the choices made regarding the case study.

Chapter 4 will present the empirical results on how the Piemonte Brussels office lobbies the EU institutions, focusing on its material and non-material resources, partners and strategies. This chapter will end with the analysis of the case study on regional lobbying on the future of Cohesion Policy post-2020.

The last chapter will synthesise the main research findings along the nine sub-questions developed in chapter 2 and will discuss the thesis' theoretical and societal implications. Finally, the results will be operationalized into a number of strategic recommendation to improve Piemonte Region's lobbying in Brussels.

Chapter 2. Theoretical framework

From a theoretical point of view, this thesis aims at filling a gap in the academic literature with respect to the context of the EU multilevel lobbying arena, by in-depth investigating the interest representation strategies employed by a regional authority through its Brussels offices. For this reason, the theoretical foundation of this research is twofold combining two distinct but complementary fields of research: the studies on regional delegations in Brussels and the theories of interest groups' lobbying in the European Union. Very few studies so far have made an explicit link between the activities of the regional representations at the heart of Europe and the theories on interest groups' lobbying (Dür and Mateo 2012). However, these two theoretical fields overlap in practice in the case of regional delegations' lobbying in Brussels.

Regarding the literature on subnational delegations in Brussels, while a substantial amount of academic research has been carried out on the determinants and channels of regional mobilization in the EU, only few studies have focused on the concrete lobbying activities and strategies that Regions decide to undertake in Brussels and on what determines these choices (Tatham 2017, 1090). On the other hand, the research focus of the theories on interest representation in the EU has predominantly been on the lobbying activities conducted by private sectors and civil society actors. Consequently, the Regions, a significant category of interest group operating in Brussels, have received less attention (Ibid.). To connect these two research streams, will result in a better understanding of the interest representation practices of regional delegations at the heart of the EU.

The literature review that will be conducted over the following sections will allow to identify the key themes and variables that can guide the in-depth empirical research on the lobbying practices of a regional representation to the EU. This theory building exercise will result in the development of an analytical framework to investigate a Region's public affairs activities in Brussels allowing for the application of the theoretical insights to a concrete case

study. The key variables identified will be operationalized, at the end of each section, in the form of sub-questions with specific reference to the Piemonte Region delegation in Brussels and will be used in chapter 4 to investigate the specific case of the lobbying conducted by this office.

2.1. Research on regional delegations to the EU

Starting from the late 1980s, regional authorities from every part of Europe have increasingly mobilized at the EU level. One of the most striking form of this engagement has been the proliferation of regional representation offices directly at the heart of Europe (Beyers and Donas 2014; Tatham 2013, 64; Tatham and Thau 2013, 257). In order to monitor and strengthen their involvement in the EU decision-making, in fact, more and more European regions have invested considerable resources to establish themselves in Brussels in close proximity to the EU institutions. (Marks et al. 2002, 15; Mamadouh 2001).

The first two subnational offices in Brussels were set up around mid-1980s by English and German local and regional authorities. This institutional development went substantially unnoticed, but the numbers of regional representations in the EU has kept growing rapidly since (Tatham 2015, 388; Huysseune and Jans 2008, 2, Rodriguez-Pose and Courty 2009, 4). Although estimates vary a little depending on the operational definitions of regional authority and of active representations, there are currently between 200 and 250 regional offices active in Brussels; meaning that more than two thirds of European Regions operate an office in the city (Donas and Beyers 2013, 535–537; Marks et al. 2002, 1; Tatham and Thau 2013, 257; Tatham 2017, 1095; Greenwood 2003, 1).

The establishment of regional offices clustering in the European district seems to demonstrate how Brussels has effectively become the “capital” of the EU (Hein 2015). This form of physical and political presence of Regions in Brussels has been interpreted in the literature as showcasing the great impact of the EU on its Regions as well as reflecting the strong desire of these subnational authorities to promote the idea that they enjoy power and influence beyond their physical territory (Ibid., 105).

While the reasons for the opening of regional offices in Brussels are evidently region and country-specific, it is nevertheless possible to identify some common trends (Rodriguez-Pose and Courty 2009,6). In general terms, the main determinant for this form of regional mobilization has been identified in the rapid expansion of EU competencies which augmented the pressure on regional authorities that responded by stepping up the level of their engagement in EU affairs establishing offices in Brussels.

Because of the process of European integration, over the past decades, Member States have transferred powers upwards toward the EU institutions and downwards to the subnational authorities (Hooghe et al., 2001). This simultaneous bidirectional process resulted in regional authorities becoming more and more involved in the implementation of EU law but with a severely limited ability to shape this legislation (Moore 2008b, 213; Moore 2008a, 518). Consequently, regional governments, to avoid becoming simple policy-takers, have become more assertive and have attempted to represent their interests directly at the EU level (Hecke et al.2016, 1433; Högenauer 2015, 2). It was therefore the *“Europeanization of regional policies”* that resulted in the development of institutional structures meant to foster regional participation at the EU multilevel arena (Benz and Eberlein 1999, 331).

It is important to notice that not only regional offices in Brussels continued to increase in numbers at an exponential rate, but those delegations have also tended to expand in size (Tatham 2015, 388-389) and have been assigned growing policy portfolios (Greenwood 2011; Moore 2008). Particularly the older and more established regional offices have been deploying more and more resources and, in some cases, have moved to more strategic and prestigious locations closer to the EU institutions (Moore 2008a, 517-521, Bodestein and Kemerling 2011, 2).

In this regard a consensus has emerged in the academic literature, that this model of regional representation: *“has become the standard for regions from EU Member States”* (Huyseune and Jans 2008, 1). This organizational model of interest representation in the EU is, in fact, now considered a *“core component of any regional authority’s strategic portfolio on EU affairs”* (Moore 2008a, 520). It has also been suggested that a general expectation currently exists from the European institutions that every Region will be

represented and can be accessed through a permanent office in Brussels (Ibid.). As a general rule, the aggregate resources deployed by regional governments to representation in the EU are found to be comparable to those devoted by their central national governments (Marks et al. 2002, 15). In some cases, like Italy, Germany or Spain, the combined workforce of regional offices even outnumbers the staff of their home-country Permanent Representations (Tatham 2015, 388-389; Tatham and Thau 2013, 258).

The trend described constitutes, however, a compelling institutional puzzle within the current European multilevel order since these regional delegations have no official status in Brussels, are not mentioned in the Treaties and do not enjoy a formal role in the legislative process (Greenwood 2011, Huysseune and Jans, 2007). To address this theoretical puzzle the majority of studies on regional offices in Brussels has investigated the functions that these delegations serve on behalf of their home administrations.

From an extensive review of the research findings on the determinants of regional establishment in Brussels it is possible to derive five key functions that have been attributed to these offices. These can be conceptualized around five axes: funds-seeking, performing “para-diplomatic” activities, information gathering and management, networking and influencing EU policy-making. As will be shown in the following, most of these functions are, to different degrees, related to the lobbying activities that constitute the focus of this research.

2.1.1. Regional funds-seeking

Several academic explanations for the establishment of regional offices in Brussels referred to the Regions’ efforts to influence and secure the allocation of the EU Structural and Cohesion Funds (Hooghe, 1996; Chalmers 2013; Bodenstern and Kemmerling 2011). The argument has been that the resources of the Cohesion Policy acted as a pull factor attracting Regions to Brussels by creating financial opportunities (Rodriguez-Pose and Courty 2009, 5).

In this regard early researches on the determinants of EU Structural Funds allocation highlighted that this was “*subject to fierce regional lobbying*” (Chalmers 2013, 815). Some, like Bodenstein and Kemmerling, even suggested that political considerations influenced the actual distribution of Structural Funds across EU Regions and that regional lobbying seemed to pay off (2011, 19). It should, however, be noticed there is no consensus in the literature over the effectiveness of this form of regional redistributive lobbying. For example, Donas and Beyers in 2013 found little support for the claim that regional mobilization through their Brussels offices would affect the final distribution of EU Structural Funds (2013, 7). Also, Rodriguez and Courty (2009) found that the capacity of Regions to influence the commitments and allocation of funds had been negligible.

While the attempts to secure and maximise access to EU Structural Funds may have constituted the initial driving force of the process of regional engagement in Brussels (Callanan and Tatham 2014, 191; Huysseune and Jans 2008, 4), recent empirical analyses suggest that regional representations’ priorities have changed and today: “*EU-level lobbying is not primarily concerned with winning funds*” (Chalmers 2013, 816) since: “*the offices have both reoriented and broadened their raison d’être in Brussels beyond mere funding concerns*” (Huysseune and Jans 2008, 4).

2.1.2. Regional “Para-diplomacy”

Another theme that has attracted a lot of attention and raised some controversies in the literature is the claim that Regions would employ their Brussels representations to undertake “*para-diplomatic*” activities meant to bypass the Member States raising the Regions’ political profile in order to achieve more autonomy (Tatham 2008, 493). These explanations focus on the complex interaction between subnational authorities and central state governments, suggesting that some Regions may have strengthened their engagement in the EU in order to challenge governments’ authority (Moore 2008a, 517; Rodriguez-Pose and Courty, 2009, 11). Beyers and Donas, for example, drew attention to the existence of a “*multilevel power play*” describing how these offices may be used to increase a Region’s

political leverage by establishing direct relationships with other Regions and with the EU institutions to outflank national positions (2014, 552).

The assumption behind these approaches is that, within the current EU multilevel governance arena, the central state is not able to monopolize all the political relationships between its territories and the outside world and this leaves room for the emergence of patterns of paradiplomacy (Tatham 2008, 495), defined as *“the diplomatic activities exercised by territorial authorities in parallel to those of the state”* (Tatham and Thau 2013, 257). This consideration encouraged some scholars to argue that regional representations act as a channel *“through which regions can pursue their interests at the European level, unmediated by central authorities”* (Tatham 2008, 510). This seemed to be confirmed by the fact that *“when many regions first established offices in Brussels, their presence was often a point of friction with national governments”* (Greenwood 2014, 2).

However according to several authors, a number of recent developments have questioned the validity of this approach. Firstly, currently the majority of Regions are represented in Brussels regardless of ethno-political concerns thus suggesting that regionalism does not constitute a valid explanation for regional mobilization (Moore 2008a, 519). A second significant point is that sub-state paradiplomacy does not necessarily have to be conducted against the Member State (Tatham 2010, 76). It has been, in fact, proved that currently relationships between regional offices in Brussels and their national counterparts are generally shaped around the principle of cooperation (Moore 2008a, 519; Donas and Beyers 2013, 4). Moreover, Beyers and Donas in 2014 found no evidence that the mobilization of regions in Brussels implies bypassing the central state Permanent Representation which represents instead often a relevant interlocutor for the Regions (2014, 548). These empirical findings suggest some caution in claiming that Regions challenged Member States' diplomacy through their Brussels office (Tatham, 2010).

2.1.3. Gathering and managing information

A consensus seems to have emerged that the most fundamental role performed by regional delegations is to gather and manage information (Marks et al., 2002, 4; Huysseune and Jans 2007). This means, in practice, that these offices are generally entrusted with the task of collecting, processing and mediate information on the EU policy process, institutional developments and opportunities to assist their home constituencies (Ibid., 5; Huysseune and Jans 2008, 5-6).

Beside information gathering, they are also found to represent a two-direction communication channel between the EU institutions and their home region (Donas et al. 2013, 1). This mediation role is confirmed by Marks et al. research that highlighted how: *“Officers of subnational offices often think of themselves as intermediaries between their region or locality and the European Union”* (2002, 5). Because of the focus on monitoring policy developments in the EU, these representations have also been effectively described as *“early warning systems”* for regional governments (Donas et al. 2014, 79-80).

This flux of intelligence is particularly important for regional authorities which have a strong direct interest in being informed about the policy-making process and future regulatory developments (Marks et al. 2002, 4). These informational activities represent, in fact, a necessary starting point for all the other functions performed by regional offices, like identifying funding opportunities as well as engaging in the building of cooperative networks and in regulative lobbying (Huysseune and Jans, 2008, 5).

2.1.4. Creation of cooperative interregional networks

Closely linked to the previously described function of information gathering is the activity of information exchange and networking among different regional offices in Brussels. These offices are described in the literature as regularly involved in developing relationships and building cooperative networks with other Regions (Huysseune and Jans 2007). This task is said to be greatly facilitated by their strategic location at the heart of the EU (Greenwood 2014, 7; Beyers and Donas 2014, 548).

The opening of an office in Brussels, placing governments coming from different and distant Regions in close proximity, can promote the creation of regional networks by lowering transaction costs of informational exchanges thanks to the intense and regular contacts among their officials (Marks et al. 2002, 4; Greenwood 2014, 7). In this regard, Hein described how in Brussels some Regions even clustered in the same building with others having similar interests or belonging to the same country in order to share resources and information (2015, 101).

Several authors described how the establishment of transnational networks is an important part of local authorities' engagement in Europe (Huggins 2011, 14). Greenwood, for example, argued that regional mobilization in Brussels cannot be explained by fund-seeking purposes alone but that the building of cooperative networks is an important role of regional liaisons (2014,7). This is confirmed by the fact that the majority of the European local and regional authorities are members of several formal and informal transregional networks (Donas and Beyers 2012; Hooghe and Marks 1996, 73). Moreover, Moore also argued that the emergence of a complex and dense web of institutional relationships in Brussels represents a significant proof that "*some regional offices are maturing into effective political actors in Brussels circles*" (2008a, 521).

Ultimately, the argument that emerges from the literature is that without a well-established network of formal and informal relationships with the other relevant actors in the policy scene, a regional office would not be able to carry out any significant activity of interest representation towards the European decision-makers. The fundamental function of these networks is, in fact, described to be information exchange (Beyers and Donas, 2014), which can either have a technical character aimed at exchanging best practices and expertise or a more political character which, by raising a region's influence, can improve its potential for lobbying (Beyers and Donas 2014, 549; Greenwood 2014, 7; Huggins 2011, 8).

2.1.5. Shaping EU policy-making

Finally, some of the regional offices in Brussels are also described in the academic literature as explicitly engaged in trying to represent the interests of their territories directly at the European level by means of lobbying activities. This exercise of political influence is found to be closely dependent on the other activities described so far (Marks et al. 2002, 6). The argument is that these offices represent a channel of access used by local authorities seeking to directly influence the EU policy-making process and outcomes (Callanan and Tatham 2014, 191; Moore 2008a, 518; Tatham 2008, 493).

While a consensus has emerged among scholars that a significant number of regional offices in Brussels consider themselves as involved in lobbying activities (Donas et al. 2013), less obvious is the extent to which these interests' representation activities are found to be effective in influencing EU legislation. A first important clarification in this regard is provided by Marks et al.: "*Subnational offices do not have formal competencies in the EU, so to the extent that they exercise influence, it will be soft*" (2002, 16). Consequently, scholars have generally been cautious in attributing direct political influence to regional representations in Brussels (Ibid., 6). Instead, they suggested that they may be more effective in shaping decision-making especially in the policy area they are most affected by, like Cohesion Policy, environmental legislation and social affairs (Ibid. 15). A more sceptical view is the one of Hecke et al. who argued that regional offices in Brussels primarily serve the function of increasing the Region's visibility while not contributing substantially in terms of effective policy influence (2014, 1445).

Moreover, besides the enthusiasm for this new form of regional engagement in the EU affairs some studies have also addressed the theme of inclusion and exclusion of Regions within the EU multilevel governance. It should be recognized that significant diversity exists among Regions in their ability to actually participate to the EU informal governance processes happening in Brussels (Hooghe 1996; Moore 2008a, 531). The engagement of Regions is, indeed, differentiated and despite a general will to be represented at the EU level, it should not be overlooked that "*staggering inequalities*" still exists between them in term of resources, staff, strategies and objectives of their mobilization (Ibid., 532; Marks et al. 2002, 9; Rodriguez-Pose and Courty, 2009, 6).

In this regard it is important to acknowledge that not every Brussels regional representation is found to be engaged in lobbying activities: around a quarter of the total of the regional offices are rather weak in lobbying and limit their activities to monitoring the policy scene or serve different purposes (Donas et al. 2013, 12). Moreover, among the Regions actively engaged in lobbying, considerable differences exist in the policies and issue that they prioritize (Ibid., 19). According to Donas et al., it is possible to distinguish three types of regional representations based on their policy portfolio. One group is said to focus mostly on monitoring policy developments, a second large group focuses mainly on redistributive issues and a third group, endowed with more legislative authority, is also engaged in regulatory lobbying (Ibid. 20).

Finally, institutional resources, in particular the level of decentralisation, have been singled out in the literature as a very significant factor in explaining variation in regional lobbying at the EU level (Huwylers et al., 2018, 758). More precisely higher levels of self-government are found to result in a greater interest in the EU policy-making process and in a stronger desire to influence it (Tatham, 2017, 1093). In this regard, Huysseune and Jans found that Regions with more legislative powers have easier access to the Council of Ministers and to the Commission because of their stronger domestic political position. They are also found to be more focused on influencing EU legislation because of the larger impact of European legislation on their governing activities (2008, 1-7).

Sub-questions:

On the basis of the academic review conducted so far, the following sub-questions can be formulated in order to allow for an in-depth analysis of the specific case of Piemonte Region delegation to the EU:

- **S.Q.1:** Which of the activities ascribed to Brussels-based regional offices in the academic literature does the Piemonte Region delegation serve? How are these functions prioritised?

- **S.Q. 2:** What are the institutional, administrative and political features of Piemonte Region that determine its lobbying activities in Brussels?
- **S.Q. 3:** To what degree is the Piemonte Region delegation in Brussels engaged in attempts to lobby the EU decision-making process?

2.2. Theories on subnational interest groups in the EU

Having reviewed the main research findings from the perspectives of the studies on regional mobilisation in the EU, over the followings sections a framework will be developed to analyse regional lobbying from the point of view of subnational interest groups' studies. The rationale behind this theoretic approach is that by studying the practices of regional delegations in Brussels within the framework of organized interest groups theory, it is possible to get a better understanding of how Regions strive to gain influence within the European multilevel system (Eising, Rasch and Rozbicka, 2017, 943). In this regard, this research is intended to fill an existing gap in the understanding of the interest representation activities within the EU lobbying arena regarding the practices put in place by Regions to influence the EU institutions. Despite the rapid development of studies on interest groups within the European Union, the lobbying of subnational public authorities in EU politics has attracted so far only limited academic attention (Tatham 2017).

While in the literature on regional mobilization it is explicitly recognized that many Regions are engaged in attempts to influence the EU decision-makers, in the field of interest studies regional authorities are often not explicitly conceptualized as fully-fledged actors of lobby. Therefore, with few exceptions (see Marks et al., 2000 and Tatham, 2017), little or residual academic attention has been dedicated to in-depth studies of the concrete lobbying activities and strategies put in place by Regions through their Brussels offices. However, this category of subnational interest group is not only of great academic interest for the analysis

of the EU multilevel decision-making system but is also relevant in quantitative terms. According to Wonka et al. data set, in 2010 regions made up for 7.3% of the entire interest groups population active in Brussels (2010, 467).

In the following, Regions will be conceptualized as a category of interest groups operating within the EU decision-making arena (Donas et al. 2013, 2). From a theoretical perspective, in fact, they are not fundamentally different from other domestic groups that have mobilized representing their interests directly at the supranational level (Huwylers et al., 2018, 754). Currently regional authorities are, in the practice, recognized stakeholders in the EU governance landscape and many of them are found to be engaged, through their Brussels' offices, in genuine lobbying activities very similar in practice to those of other types of interest groups operating. (Huyseune and Jans 2007; Eising, Rasch and Rozbicka 2017, 946).

Regional offices in Brussels are particularly interesting because, while they operate similarly to other lobbying organizations, they are, at the same time, peculiar actors by virtue of being emanations of public authorities (Huyseune and Jans 2007). This characteristic distinguishes Regions from other organized interests operating in Brussels, such as private lobbies (Tatham 2015, 389). The argument put forward to conceptualize Regions as a peculiar category of lobbyists is that being elected governmental bodies they have the capacity to express the legitimate interests of the broad citizenry and not only of specific stakeholders (Greenwood 2011).

Having established that regional governments operating permanent offices at the heart of the Union can be effectively conceptualized as a specific type of interest group trying to influence the EU decision-makers, it becomes relevant to analyse the main features of the Brussels' lobbying arena. Particularly, in the following sections, an operational definition of lobbying in the EU will be provided. Subsequently, the role of resources in allowing interest groups to get access and influence over the decision-making processes will be explored, followed by a review of the practical lobbying strategies and access points used by those groups.

2.2.1. Lobbying within the EU multilevel context

Lobbying has been defined in the academic literature on EU interest groups as the act of *“representing, promoting and defending a particular interest, by influencing the political decision-making process”* (Mayrhofer 2014, 153). In this context, the notion of influence is understood as *“the ability of an actor to shape a political decision in line with his preferences”* (Dür 2008, 561). Lobbying can be public or private depending on the nature of the actors engaged in the interest representation activities (Mayrhofer 2014). The focus of this research will be on public lobbying, often labelled also as *“institutional interest representation”*, conducted by regional authorities by means of their delegations in Brussels.

Despite the fact that the notion of lobbying often carries a negative connotation, it is currently recognized in the literature and by EU policy-makers as an established part of the political process and as a natural counter-power in the decision-making (Ibid., 154). This is clearly expressed by Dür and Mateo: *“Interest groups participation may enhance the legitimacy and quality of decisions by allowing for different voices to be heard and expertise to be transmitted to decision-makers”* (2012, 969). However, if unregulated and without the appropriate counterbalances, lobbying may have the opposite effect as well, by systematically serving the interests of one group over the public interest (Klüver 2013).

The analysis of the institutional context plays a major role in the study of interest groups influence in the EU because it defines their opportunities to get in touch with the decision-makers (Ibid.,11). In this regard, the main feature of the EU institutional context where regional lobbying take place is that the: *“the multiple layers of government together with the high fragmentation of the European institutions provide a plurality of access points to the decision-making process”* (Klüver 2013, 2). Moreover, lobbying within the EU is described by Chalmers as *“inherently interactive”* since the most important aspect for interest groups is to obtain access to *“the right people”* because relationships and *“face-time with decision-makers”* represent essential prerequisites to influence the policy-making processes (2013c, 41). Lobbying in the EU sphere has, therefore, been generally conceptualized in the literature as *“an exchange relationship in which the European*

institutions trade influence for information, citizen support, and economic power” (Klüver 2013, 4).

In this regard Chalmers, investigating the lobbying dynamics in Brussels, highlighted that interest groups regularly share policy-relevant information with the EU decision-makers in exchange for access and influence in the legislative process (Chalmers 2013b, 475). These organized interest groups are found to be relatively expert on the policy issues that most affect their interests and, thus, possessing information and expertise that is valuable for the EU institutions. The assumption behind this argument is that EU officials are at an informational disadvantage compared to organized interest groups because of staff, resources and time constraints (Huysseune and Jans 2007, 11). As a consequence, interest groups can use this informational asymmetry, to obtain access and then influence the policy making (Chalmers 2013c).

For the purpose of this research, lobbying activities will thus be defined as a very broad set of concrete activities and strategies meant to get in contact with EU decision-makers and influence them directly or indirectly. While this definition may now seem excessively broad and encompassing, the understanding of the concept of lobbying will be further clarified over the following analysis.

2.2.3. Lobbying Resources

A recurrent theme in the lobbying theory is the role of resources endowment in determining interest groups' access to the decision-makers and ultimately their influence on the policy outcomes (Klüver 2013; Eising, Rasch and Rozbicka, 2017, 940-941). For example, Dür and Mateo (2012), investigating how interest groups behave in the EU system of multi-level governance, highlighted the significance of resource-endowment and how the type of these resources matters in terms of access to the decision-making process in the EU, showing that resources-rich groups are more active in lobbying on EU legislation (969). Similarly, Tatham in 2017 emphasised how a Brussels-based regional office's resources play a key role in determining its capacity to effectively lobby the EU institutions (2017, 1092). Therefore, for this study, it is necessary to identify the key resources for the lobbying

activities conducted by regions through their Brussels's offices and to explore in greater details the characteristics of these resources.

Two basic types of resources determining a Brussels' office capacity to lobby have been identified in the interest representation literature. The first one is material resources, especially in terms of office's financial means and staff (Rodriguez-Pose and Courty 2009, 4; Tatham 2017 1092). In this regard, the argument put forward by Tatham is that greater material resources will enable a Brussels' regional office to engage in more costly activities like trying influence the EU decision-making process or monitoring legislative developments. Conversely offices endowed with limited resources will more likely prioritize less costly activities like funds-chasing, networking or simply act as a communication platform to facilitate exchanges between regional stake-holders and the EU institutions (2017).

The second type regards a variety of non-material resources such as: experience, know-how, perceived legitimacy and representativeness, knowledge and information (Dür and Mateo 2012; Tatham 2017). In this regard, as already described, several studies pointed at the dynamics of supply and demand for information with reference to the EU institutional context (Eising, Rasch and Rozbicka, 2017, 942). The general argument is that interest groups use non-material resources "*as currency in exchange for access and influence from decision-makers*" (Dür and Mateo 2013, 6).

Besides the importance of policy-relevant information, that has been covered earlier, representativeness is also identified as a key resource in getting access to the EU institutions. This is particularly true for the European Commission that being "*a consensus driven institution*" is described in the literature as having a preference for interacting with interest groups that are "*representative*" of an EU-position rather than with individual positions (Chalmers, 2013b, 489). In this regard regional offices, especially when acting as part of transnational coalitions, are said to enjoy a privileged position in terms of access to EC officials because they are able to speak on behalf of collective interests across multiple Member States (Huysseune and Jans 2007, 11; Högenauer 2015,2).

Another type of non-material resources that has been singled out as very significant in determining an office's lobbying capacity is the staff's human capital and experience of the Brussels' context. Human capital factors embodied in the Brussels staff, such as proficiency in the EU working languages, the number and quality of informal and personal connections, are often considered as essential resources for interest representation offices (Rodrigo, 2012). The supranational embeddedness of an office's personnel, in fact, provides dynamism and effectiveness in moving in the complex institutional web in Brussels and easier access to informal contacts (Ibid.).

Empirical insights on the impact of resources-endowment on Brussels offices' lobbying activities have been provided by Tatham (2017), one of the few to explicitly study the practices of regional delegations to the EU within the framework of organized interest groups theory. His research highlighted how immaterial factors such as "*Brussels-based social capital*" and contextual know-how are key in determining an office's ability to engage in complex and cost-intensive lobbying activities (2017, 1103-1104). He concluded that regional offices endowed with greater staff and a longer experience in the Brussels are significantly more interested in influencing EU legislation and less absorbed in funds seeking or networking activities (Ibid.). These results ultimately proved the importance of experience and longevity in the "*Brussels pond*" in order to understand that activities that regional representations undertake (Ibid., 1089).

Sub-questions:

On the basis of the academic findings presented, the following sub-questions on how Piemonte Region can get access to the EU decision-makers using a number of different lobbying resources can be formulated:

- **S.Q. 4:** *What are the material resources at the disposal of the Piemonte Region office in Brussels?*

- **S.Q. 5:** What are the non-material resources and how are they used? (legitimacy and representativeness, expertise and policy-relevant information, experience of EU affairs and the regions officials' Brussels-based social capital)

2.2.4. Lobbying strategies, channels and coalitions

A review of the academic literature on interest groups' activities in Brussels also reveals a number of trends regarding the lobbying tactics employed by interest groups to influence the EU decision-makers. Dür and Mateo, amongst others, proposed a conceptual distinction of these strategies between outside and inside lobbying tactics (2012). Outside tactics consist of interest groups trying to mobilize support from outside the policy-making community in order to put pressure on decision-makers. Examples of these strategies are: using media campaigns, launching internet debates and organizing public events and demonstrations. On the other hand, inside interest representation tactics refer to more direct contacts between the lobbyists and the decision-makers through strategies such as letters, phone calls, face to face meetings, participation in events organized by the political institutions and drafting of position papers. (Dür and Mateo 2012, 975-978; Chalmers 2013c; Dür and Mateo 2013, 13).

In the literature on lobbying within the EU, inside tactics are generally considered to be more effective than outside ones as they are usually less costly and involve less reputational costs for the decision-makers (Chalmers 2013c, 43). In practical terms, a number of researches, also highlighted that interest groups, including regional actors, tend to use a wide and mixed range of tactics to convey their interests to the EU institution; such as a strategic combination of meeting with EU officials, EC open consultations, presentation of position papers and organization of public events (Chalmers 2013c, 52; Beyers et al. 2014, 16; Hecke et al. 2016). The idea is that presenting the message through a range of different forms and channels expresses the seriousness and commitment of a group highlighting the importance of the interests conveyed (Chalmers 2013c).

Another conceptual distinction refers to the level at which subnational interest groups decide to lobby the EU decision-making process. They can, in fact, do this either by targeting

national actors who will then defend their position in the Council and vis a vis the Parliament and Commission or they can directly lobby the EU institutions (Dür and Mateo 2012, 971; Dür and Mateo 2013). In this regard, Huwyler et al. in a recent work argued that: “*when trying to influence the EU policy-shaping process from home, European regions use extra-state channels more frequently than intra-state ones*” (Huwyler et al., 2018, 754). Lobbying directly at the EU-level is generally considered to be costlier, but also more effective since interest groups are likely to get better information and can be active already at the agenda setting stage (Dür and Mateo 2013 9).

The clearest example of extra-state channel employed by regional authorities to lobby the EU is precisely the establishment of a representation office directly in Brussels. Other examples of unmediated access points available to the Regions independently of their Member State are the establishing of contacts with the EU institutions directly. The main interlocutor for Regions is said to be the European Commission but regional offices are also described in the literature as working closely with their representatives in the European Parliament especially if they are “*relevant figures in Committees and rapporteurs*” (Huwyler et al., 2018, 763).

Some researchers have also highlighted the role played, in some cases, by the National Permanent Representations in supporting the regional offices’ lobbying, for example by allowing for the transmission of regional interests to the Council (Moore 2008a, 519; Donas and Beyers 2013 and 2014). Some regional offices in Brussels are, in fact, found to be working in close cooperation with their national counterparts in Brussels on specific policy issues of regional interests. (Ibid.). For this reason, the relationships of regional offices with their national permanent representatives is of particular interest and will be investigated as one of the relevant access point for Piemonte Region in Brussels.

Likewise, the Committee of the Regions, a consultative assembly representing regional and local authorities, has been in some studies described as a significant extra-state channel used by regional authorities to conduct lobbying activities in Brussels (Huwyler et al., 2018). There is no consensus, however, on its effectiveness in terms of Regions’ influence on EU legislation (Mamadouh 2001). The Committee of the Regions (CoR),

established by the Maastricht Treaty, was supposed to be the official response to subnational governments' demand for representation at the EU level, but it currently occupies only a very modest place within the EU decision-making process (Hönnige and Panke 2016). Besides its limited impact on the EU legislative process, the CoR's value in terms of regional lobbying is also said to be constrained by the fact that its members are formally appointed by the Member States and not directly by the regional authorities (Mamadouh 2001, 480; Greenwood 2011). Therefore, Huysseune and Jans observed that Brussels-based regional offices "*only attribute a limited importance to the Committee of the Regions*" when they intend to exert political influence (2007,14).

The participation of Regions to transnational networks and coalitions has also been investigated as a significant lobbying strategy with good potential enhance regional influence on EU decision-making (Hooghe-Marks 1996). Networking is said to represent an essential coalition-building exercise mean to prepare for future lobbying initiatives and to favour information exchange (Ibid., 158; Mayrhofer 2014). Transnational networks and ad-hoc coalitions are considered to be essential components of conducting lobbying activities in Brussels for two main reasons.

Firstly, since the Brussels lobbying arena is becoming increasingly crowded, the mobilization of a critical mass by cooperating with other stakeholders in collective platforms is essential to ensure some influence on the EU policy-making (Klüver 2013). Secondly, formal and informal networks and coalitions represent a strategic tool to collect and manage policy-relevant information. On this regard Chalmers (2013b) highlighted that that interest groups are able to obtain a great amount of strategic information from their network connections through the sharing of news, tips and privileged information (475-476). Thanks to these informational advantages the interest groups that cooperate through networks are found to be better placed to influence the EU policy-making (Ibid.).

This overview of interest groups studies revealed how the establishment of a Brussels office represents potentially a noteworthy instrument for regional authorities to address a number of obstacles in their access to the EU decision-making. A permanent delegation in Brussels, in fact, could allow them to address the EU institutions directly through a variety of

lobbying practices (Mayrhofer 2014, 159). From this analysis it has also become evident how there is not a unique ideal model of regional interest representation in the EU (Rodrigo 2012). Conversely, as clearly expressed by Rodriguez-Pose and Courty: “A complex regional interest mix is behind decisions to set up permanent regional offices in Brussels and determines the modus operandi of each regional office” (2009,9).

Sub-questions:

In conclusion, the review conducted in this section highlighted a set of significant features of the EU lobbying landscape that can guide and structure the investigation on the interest representation practices of Piemonte Region in Brussels. These are conceptualized in the form of sub-questions, as follows:

- **SQ. 6:** Who are targets and institutional counterparts of the lobbying activities conducted by the Piemonte Region through its Brussels office?

- **SQ. 7:** What is the role and significance of the Committee of the Regions and of the Italian Permanent Representation in Brussels for the lobbying conducted by Piemonte Region?

- **SQ. 8:** What is the role and significance of the Region's participation to networks and ad-hoc coalitions for its lobbying activities in Brussels? Who are the partners and the alliances of Piemonte Region with regard to its lobbying activities?

- **SQ. 9:** What are the lobbying tactics used by the Piemonte Brussels office to represent its interest to the EU institutions? Does it resort predominantly to inside or outside lobbying tactics?

Chapter 3. Methodology

3.1. Overview and justification of the research strategy

In the following chapter the methodological design of this study will be presented together with the choices made in terms of research strategy. Having the objective of understanding how a specific regional authority represents its interests through a delegation in Brussels, this study will be based on a mixed qualitative methodology instrumental to develop a case study approach. More specifically, this research's qualitative approach will combine the following data collection methods:

- 1) Participant observation through first-hand participation in the daily work of the Piemonte Region delegation in Brussels;
- 2) Semi-structured interviews with the policy officers and the Director of the Piemonte Region delegation in Brussels;
- 3) A comprehensive document analysis covering office's internal memos and reports, a wide range of position papers as well as documents and policy proposals coming from the EU institutions.

These three methods will allow for the cross-validation of the information that will be used to conduct a case study analysis of the Piemonte Region's lobbying strategies regarding the future of Cohesion Policy post-2020. This methodological design is built upon the acknowledgement that, in the academic literature on EU lobbying, qualitative research is a recognised method to analyse relationships between interest groups and policy-makers (Bunea and Baumgartner, 2014). Moreover, combining different data collection methods to strengthen the validity of results is a well-established practice in the literature on interest groups in the EU (Ibid.). In the next sections each of the research methods employed for this research will be presented and all the methodological choices will be further explained and justified.

3.1.1. Participant Observation

The first methodological element of this research design is participant observation defined as *“the process enabling researchers to learn about the activities of the people under study in the natural setting through observing and participating in those activities”* (Kawulich 2005, 2). In this method the researcher is part of the group under study and the group is aware of the research activity (Ibid., 8-9). The main objective of making use of participant observation is to *“develop a holistic understanding of the phenomena under study ”* (DeWalt & DeWalt, 2002, 92). Focusing on human interactions and qualitative in-depth analysis, this methodology involves a flexible and open-ended logic of enquiry (Jorgensen 1989).

A number of strengths of this approach have been identified in the literature, making participant observation an appropriate method for this study. Firstly, observation is a recognised tool used across several disciplines to collect information on ongoing processes (Kawulich 2005) as clearly expressed by the words of Jorgensen: *“The methodology of participant observation is exceptional for studying processes, relationships among people and events, the organisation of people and events”* (1989, 17). This method is also said to be especially suitable to assist the researcher in identifying the most relevant informants and themes as well as to observe social interaction and norms. (Kawulich 2005, 5). Moreover, participant observation is found to be particularly useful to answer descriptive research questions and to facilitate the overall research process allowing the researcher to get acquainted with the members and the dynamics of the group under study (Ibid.; DeWalt & DeWalt, 2002).

These features justify the choice of adopting participant observation as the initial research method of this study. The process of participant observation for this research took place over a period of five months, between February and June 2018, when I have had the opportunity to work full-time as an intern in the Piemonte Region delegation in Brussels. Over this research internship, I have been personally involved in the development and implementation of the Region’s lobbying activities regarding the future of Cohesion Policy post-2020. I therefore have enjoyed a privileged perspective to observe and critically reflect on the practices of interest representation of Piemonte Region in the EU, having possibility to study the processes happening in the office through constant and direct involvement in

the day-to-day activities of the delegation. For this research, participant observation has been instrumental in preparing the interviews and in becoming acquainted with the subject of the case study understanding how the office is organised, which activities are prioritized and how people interact.

While participant observation can be instrumental to get a better understanding of the context of the phenomenon under study, it has some limitations regarding the objectivity and comparability of its results (Jorgensen 1989, DeWalt & DeWalt 2002). However, as suggested by Beyers et al., these shortcomings can be addressed by making use of additional data collection strategies such as interviewing or document analysis (2014).

3.1.2. Semi-structured interviews

The second element of the methodological design of this research has been face-to-face semi-structured interviews with the entire staff working for Piemonte Region in Brussels.

Semi-structured interviews entail open-ended questions designed to elicit the respondent's ideas and opinions on the topic of interest (Edwards and Holland 2013). This form of data collection combines the reliability and uniformity of a pre-determined set of questions with the necessary flexibility for the interviewer to elicit more meaningful responses and investigate the most relevant themes by asking for examples and clarifications during the interview (Ibid.). Semi-structured interviews are a very suitable data collection method to investigate how an organization operates as well as to highlight strengths and weaknesses of its activities, since they provide a great amount of detailed information on the context and on the stakeholders' experience, perceptions and informal interactions (Beyers et al. 2014).

When conducting interviews, the selection of respondents is crucial in order to obtain valid and reliable data (Ibid., 181). In terms of sampling, the choice has been to focus on intensive individual interviews with a limited number of expert respondents rather than to conduct a more general survey involving a broader set of actors. This choice reflected Beyers et al. insight that expert interviews are the most appropriate method for studying

interest groups lobbying strategies (2014). Moreover, the respondents' selection has been driven by the recognition that the research objective was to get a detailed description of the office's activities and lobbying by the practitioners that are personally responsible for carrying out these tasks. For this reason, each of the three policy officers working in the office have been interviewed as well as the Director responsible for the overall management of the office's activities. Namely, the respondents from the Piemonte Brussels delegation have been:

- 1) The Head of the Sector "*Institutional Relations and European Affairs*";
- 2) The policy officer responsible for competitiveness and Cohesion Policy;
- 3) The policy officer responsible for territorial policies, transport, agriculture and environment;
- 4) The policy officer responsible for social affairs, education, health and culture.

Four interviews, of approximately 45 minutes each, have been conducted, recorded and transcribed in Italian which is the mother tongue of all the respondents as well as the working language of the office. This choice has been meant to allow the respondents to answer with better ownership expressing their views in a more fluid, precise and detailed way. The most relevant and illustrative statements have subsequently been translated and reported in the thesis in English. The first part of the interviews has been dedicated to a general description of Piemonte's office the activities, operations, functions and counterparts. The second section, instead, focused specifically on the lobbying activities regarding to the future of Cohesion policy post-2020².

The interview model has been developed on the basis of the understandings obtained from the first months of participant observation in the office that have been key to mature the solid understanding of the topic necessary to develop meaningful questions. Also, the insights of the literature review conducted assisted me in preparing the interviews focusing on the most relevant themes and avoiding a number of methodological pitfalls.

An example of these pitfalls is that regional offices, when responding to surveys and interviews on which activities they are conducting in Brussels, are often found to claim a

² For more information on the interviews, including the model of the questions, see Annex 2.

generalist profile declaring that all of their activities are of prime importance (Huyseune and Jans 2007). However, as highlighted by Mbaye's study, the fact that: *"all offices seem to think they're doing nearly everything"* (2009, 13), runs the risks of severely limiting the validity and usefulness of studies trying to get a critical understanding of these activities. To address this limitation, in crafting the questions of the interviews, I have followed Tatham (2017) methodology of asking respondents to prioritize among the different activities performed by the office rather than asking about the absolute importance of these, in order to elicit more meaningful responses.

3.1.3. Document analysis

The last element of this research's methodological design has been a qualitative Document Analysis. The rationale of conducting a similar review of the documentary material lies in the acknowledgement that qualitative Document Analysis is found to be of particular use:

- to gather background and contextual information;
- to answer basic questions about an institution's structure and organization;
- to identify discrepancies between formal arrangements and real working practices;
- to track policy change and developments;
- to orient and give focus to the research (Bowen 2009).

Specifically, for the purpose of this study, the review of internal reports and of regional position papers has been very useful in investigating the policy objectives of Piemonte Region and the organizational arrangements of its Brussels office.

Documents Analysis is often used in combination with other research methods. The choice of conducting documents analysis has, in fact, the potential to better contextualize the information drawn from observation and interviews as well as to provide a more objective and impartial perspective by allowing to check for the validity of the data collected (Bowen 2009).

This unobtrusive analytical procedure requires the researcher to find, get access, critically reflect and appraise the data contained in the documents while ensuring the appropriate confidentiality (Ibid.). For this study, I have had access to a very large set of internal office's documents thanks to being an intern at the Piemonte office in Brussels. Moreover, by monitoring daily the policy processes relative to the future of Cohesion Policy on behalf of the office, I have had the opportunity to collect and assess the position papers of a large number of institutional actors engaged in lobbying activities on this theme.

To give a general indication of the volume of the documents consulted, the analysis included:

- Piemonte Region's reports and memos regarding: internal organisation, legislative monitoring, Cohesion Policy and other lobbying initiatives (around 20 internal documents usually between 3 to 5 pages long);
- more than 15 official position papers and declarations on the future of Cohesion Policy presented by a variety of institutional actors (Regions, national governments, think-tanks, networks...);
- the online contribution of Piemonte Region to the Commission Open Consultation on the future of Cohesion Policy;
- European Commission policy proposals and Communications on the next EU Budget;
- other EU institutions' documents on Cohesion Policy and the next EU Budget.

(A list of the papers and files consulted is available at Annex 3: *Document Analysis*)

3.2. Case study

This thesis' methodology includes an in-depth case study of lobbying conducted by the Piemonte Region delegation in Brussels. The focus is put, in particular, on the lobbying activities carried out by this office vis-a-vis the EU institutions regarding the future of EU Cohesion Policy post-2020.

A case study is a research method consisting of a detailed examination of a case and of the related contextual conditions (Gerring 2007, Seawright and Gerring, 2008). The value of this research approach lies in its closeness to real-life settings and on the great amount of detail it can provide on the phenomenon under study (Flyvbjerg 2006, 6). In fact, the *“proximity to reality”* and *“the learning process which it generates for the researcher”* specific of case-study research methods are considered to be requisites for advanced understanding in social sciences (Ibid., 21).

In the following sections, the methodological choice of focusing the investigation on the Piemonte Brussels office and on its lobbying on the future of Cohesion policy beyond 2020 will be explained.

3.2.1. Why the Piemonte Region?

The case study selected for this research are the practices of interest representation conducted by the Piemonte Region through its office in Brussels. The choice to investigate the subject by means of an in-depth study of a single Region is a deliberate one. To focus the attention on a specific case is, in fact, instrumental to achieve the desired deep and comprehensive understanding of a Region's lobbying by allowing to closely investigate its concrete interest representation practices at the micro level (Bienefeld 2015, 25). The choice of building the case study specifically around the Piemonte Region Brussels delegation requires, however, further justification.

The first rationale for selecting this specific Region is that no study has yet been conducted on the Piemonte Brussels office after twenty years of operations in the city. Moreover, so far, in-depth case studies on the lobbying of regional offices in Brussels have

almost exclusively focused on the Regions from countries such as Germany, Austria, Belgium and Spain having the highest degree of constitutional powers (see for example Rossbach, 2016, Hogenauer 2015 or Bienefeld 2015). These Regions run the largest and strongest delegations in Brussels (Greenwood 2011). However, the great majority of European Regions does not enjoy such extensive constitutional powers and operates in Brussels with a relatively small presence in terms of staff (Rodriguez-Pose and Courty, 2009; Hein 2015, Huysseune and Jans 2007). As it will be described in greater detail in Chapter 4, Piemonte is not among the largest European Regions in demographic and economic terms and its Brussels office represents a rather modest regional presence in the city in terms of staff. The investigation of its lobbying practices is therefore relevant as it can complement the research already carried out on the largest regional delegations.

The second reason to choose Piemonte is linked to the research's objective of examining the interest representation practices put in place by Regions to influence the EU institutions. For this purpose, it is necessary to build a case study around a Region that is actively and intensively engaged in lobbying activities through its office in Brussels. Piemonte Region is particularly suitable in this regard since, in the period over which this research took place, it has been significantly engaged in intense interest representation activities, particularly on the future of Cohesion Policy.

The reasons presented explained the decision of conducting a case study on the Piemonte Region office in Brussels. However, it is still necessary to better motivate the choice of concentrating the analysis on the lobbying surrounding the future of Cohesion Policy post-2020.

3.2.2. Why the debate on the future of Cohesion Policy?

To investigate the strategies employed by Piemonte to represent its interests towards the EU institutions through its Brussels office it is helpful to concentrate the attention on a specific policy issue in order to follow closely all the formal and informal interactions tracking more precisely the different lobbying activities involved.

For this reason, this study focused on the lobbying activities conducted by regional actors regarding the future of EU Cohesion Policy after 2020 as it will emerge from the European Commission proposal for the next Multiannual Financial Framework. As mentioned earlier in the introduction, focusing on this issue is motivated, in the first place, by the recognition that Cohesion Policy is currently the largest EU one in budgetary terms (ESI Funds 2018). The second argument is that, since Regional authorities are directly responsible for the management of Cohesion Funds, this policy is the most salient one from their perspective. Consequently, the debate on the future of Cohesion Policy is especially suitable to investigate regional lobbying strategies in Brussels (Marks et. 2002, 15; Kölling 2015).

One last significant point regards the fact that this research has been conducted over a particularly favourable period to observe Piemonte's interest representation practices on this specific policy theme. In fact, my internship at the Piemonte Brussels office coincided with the most significant months of policy-shaping and regional lobbying on the future reform of Cohesion Policy and I have therefore been able to follow these processes closely. Over the period between February and June 2018, in fact, the Commission's Consultations on the future of Cohesion Policy have taken place, a striking number of Regions have presented position papers on this subject, ad hoc-lobbying coalitions have been created and the Commission has presented its proposals for the next MFF and for the future Cohesion policy post-2020. These policy developments and the related lobbying activities will be the subject of the analysis on the next chapter.

Chapter 4. Findings

This chapter will be dedicated to presenting the results of the research on how Piemonte Region represents its interests to the EU decision-makers by means of lobbying activities conducted by its Brussels office. In the following the main empirical findings will be reported in their entirety. Subsequently, at the start of Chapter 5, they will be synthesised to provide brief structured answers to the nine sub-questions elaborated in Chapter 2.

The chapter will be structured as follows. Firstly, Piemonte Region's legislative competences are briefly presented in order to understand its engagement in EU affairs. The analysis moves then to the Brussels office, focusing on its material and non-material resources, activities and functions. This allows to investigate the office's lobbying and the significance of the Brussels-based regional networks for these initiatives. In this regard, also the office's linkages with the Committee of the Regions and the Italian Permanent Representation to the EU are discussed. Next, the empirical results of the case study are presented, starting with a short introduction of Cohesion Policy and of the complex debate surrounding its future after 2020. This will highlight the saliency of this policy debate for the Piemonte regional government. The case study will offer the possibility to describe in details the office's lobbying tactics, its partners as well as the targets of its lobbying. The chapter will end with a brief discussion of the policy outcomes of the lobbying activities described, looking at the European Commission proposals for the next MFF and for the next generation of Cohesion Policy regulations.

4.1. The Piemonte Region representation in Brussels

The subject of this research is the Piemonte Region representation to the EU in Brussels (from now on referred to as Piemonte Brussels office). In order to understand the lobbying carried out by this office, is it appropriate to begin with a short introduction of Piemonte defining its legislative competences and engagement with EU affairs. This focus on the Region's constitutional strength is justified by the broad consensus that exists in the multi-level governance literature that this variable is positively correlated to the likelihood of a Region mobilizing at the EU level (Hogenauer 2015).

4.1.1. Piemonte Region legislative authority and engagement in EU affairs

Piemonte is a region of Italy located in the north-west of the country, bordering to the west with France and to the north with Switzerland. The Region, which administrative centre is the city of Turin, counts on a population of 4,392,526 people producing a yearly GDP³ of 129,322 million euro (Eurostat 2017). Piemonte is one of the twenty Regions composing Italy which can be described as a unitary but “regionalised” country (Committee of the Regions 2012). Each Italian Region is an autonomous entity with law-making powers and financial autonomy having its own statute, powers and functions recognised by the Italian Constitution (art 114). With regard to the division of powers between the central government and the regional



³ Gross Domestic Product at current market prices by NUTS 2 regions

administrations, the Constitution establishes that *“Legislative power is exercised by the State and the Regions”* (Ibid., art. 117).

The Constitution recognizes Piemonte as an “ordinary status” region. Notably, as a consequence of the 2001 constitutional reform of Title V (Italian Parliament 2001), the powers of ordinary statute regions have been significantly extended. The Constitution, besides a list of the matters exclusively reserved to State jurisdiction, now contains a list of subjects of “concurrent jurisdiction” for which the State shall only set fundamental principles but regulatory competencies lie with the Regions. Moreover, the Regions enjoy legislative powers on any matters not expressly attributed to the State (Ibid.).

The Regional Statute provides that the Piemonte shall have an elected Parliament⁴ and a government led by a directly elected President (Regione Piemonte 2005, art. 16). The Regional Statute also contains the legal foundation of Piemonte’s engagement in European Affairs. In particular, article 15 states that: *“the Region, in compliance with the procedural rules established by the Law of the State, contributes to the determination of the policies of the European Union, participates in decisions aimed at the formation of Community legislative acts and provides for the implementation and information of international and community agreements”* (Ibid.). Also, the Region has a duty to promptly adapt its legislation to the principles and the directly applicable obligations contained in EU Law (Ibid.).

Regarding to the legal basis for the participation of Piemonte in the EU decision-making, the Statute declares that: *“The Region participates in the bodies of the European Union which provide for its representation”* (Ibid.). A significant channel to give effect to this participation is the office that Piemonte established in Brussels which will be the subject of the followings sections.

⁴ Denominated *“Regional Council”*.

4.1.2. The Brussels office

The Piemonte Brussels office has been established with a resolution of the Regional Council, almost 20 years ago, in 1999. The office functions as the technical, administrative and operational link between the regional administrative structures and the EU institutions (Regione Piemonte 2015). From an organizational point of view, the office depends directly from the Cabinet of the Presidency of the Regional Government and is part of the "*Institutional Relations and European Affairs*" sector of the administration. In addition to the Brussels delegation, this sector also operates through offices in Turin and in Rome.

The formal statutory objectives of the Brussels office, as expressed on its official website page, are:

- to express the regional interests in the EU;
- to give voice, visibility and support to the projects of the Region in the European context;
- to increase the Region's ability to attract resources from the EU;
- to give assistance to regional management and to the regional stakeholders for projects and initiatives to be developed in Community area (Piemonte Region - EU Affairs website).

This is a rather standard "all-purpose" list which, being not significantly different from the general description of almost every regional office in Brussels, does not provide satisfying insights on the practical activities undertaken by the Piemonte delegation. In this regard, this research allowed to shed more light on the activities performed by Piemonte office on behalf of the regional administration investigating in particular its interest representation activities.

The Piemonte Brussels delegation currently consists of three permanent policy officers. Each of them is responsible for a specific policy portfolio, covering the entire spectrum of the EU related regional competences:

- 1) Competitiveness, innovation and Cohesion Policy;
- 2) Territorial policies, transports, agriculture and environment;
- 3) Social affairs, education, health and culture (Interviews 1-2-3-4)⁵.

⁵ For more information on respondents, date and place of the interviews see: 6.1. *Interview References*

The responsible for the management of the office is the Head of the “*Institutional Relations and European Affairs*” sector which is also responsible for the regional delegation in Rome and, therefore, alternates its working time between Rome, Turin and Brussels (Interview 1). The office also regularly hosts between two and three trainees acting as personal assistants of the policy officers, usually for period of three months. The Region does not employ external experts or consultants in its representation to the EU. The policy officers working in the office are regional public employees seconded in Brussels (Interview 2).

The office is strategically located in Brussels in Rue du Trône 62, at the hearth of the European district in close proximity to the EU institutions (at walking distance from the European Parliament and the Commission). In the same premises, which are suitable to host meetings and large public events, a number of other regional representation have clustered (Piemonte Region - EU Affairs website). The building is currently a hub for regional delegations, hosting also four Italian and French regions bordering with Piemonte: Liguria, Valle d'Aosta, Sud-Provence-Alpes-Côte d'Azur and Rhône-Alpes, as well as the southern Italian Region of Puglia.

The choice of clustering in the same premises in Brussels, is of particular interest for the purpose of this research. Indeed, the significance of this association goes well beyond the sharing of costs, as it represents a concrete basis for cross-border cooperation and joint lobbying initiatives (ERAM; Interview 2). Piemonte Region, together with the four French and Italian neighbouring Regions based in the building, has formed the Alps-Mediterranean Euroregion (ERAM)⁶. This is an interregional cross-border association that brings together five bordering Regions in a single integrated geographical framework straddling the national



⁶ A Euroregion is a structure for transnational cooperation between two or more territories of different states of the EU, having the objective to promote transnational common interests.

frontier with a population of 17 million inhabitants covering an area of 110 460 km² (ERAM website).

The Euroregion first institutional meetings were launched in 2006 with the objective to consolidate its role in Europe, represent the territorial interests to the European Institutions and develop joint projects in the framework of integrated cross-border cooperation. From January 2008, these five Regions have a common seat in Brussels with the primary objective of facilitating cooperation in order to make their voices better heard by the EU institutions and in particular by the European Commission (Ibid.). This common premise in Brussels, therefore, reflects a strategic choice for closer regional cooperation and greatly facilitates the exchange of information between the five delegations in Brussels. From the interviews conducted and the direct observation over the five months of research, it emerged that the Brussels-based officers from these five Regions do, indeed, exchange and pool information on a regular basis and organize joint lobbying activities working closely together⁷. This theme will be further investigated later in the section dedicated to the case study.

4.1.3. The office's activities

Before focusing the analysis on the lobbying activities, it is necessary to understand how the Piemonte office in Brussels operates in practice, going beyond the formal description of its functions. For this purpose, the research investigated the practical activities that the officers perform on a daily basis and the functions that are considered a priority.

A first significant feature that emerged from every interview, regards the fact that there is a great variation over time in the amount and quality of tasks performed by the Piemonte Brussels office (Interviews 1-2-3-4). Therefore, it is not easy to outline a standard model of a working week in the office. When asked to describe their practical duties over the course of a “typical” week, the respondents stressed that “*the activities in Brussels are extremely variable*” (Interview 3) and they could not easily describe the tasks of a week in the office because the amount and type of work varies a lot, between seasons and even

⁷ Data derived from participant observation conducted in Brussels between: 05/02/2018 and 29/06/2018.

between different years. Over the year, in fact, the activities performed follow the legislative cycles of the EU institutions and, between different years, they are said to depend heavily on the seven-year EU multiannual financial programming (Ibid.)

Nevertheless, the different practical activities described by the policy officers in the interviews can be grouped in three main categories:

1) A first set of tasks consists of monitoring and collecting relevant EU affairs information as well as managing such intelligence to make it readily available to the home administration (Interviews 2-3-4). Every day a significant part of the work of all the three officers is dedicated to apprising what happens in the EU governance landscape in order to signal the most recent developments, declarations and policy documents (Ibid.). Thanks to these informational activities, the Brussels' office is able to act as an "early warning system" for the regional administration. As effectively described by one of the respondent, the Brussels office main activity *"is a continuous research of information through all the available sources"* (Interview 4). In practical terms, this is done by means of a daily review of local, regional, national and EU newspapers and by monitoring the EU institutions' websites as well as following a number of newsletters on EU affairs (Interview 2-3-4). The monitoring also includes following, mostly in streaming, the European Parliament proceedings, especially of relevant Parliamentary Committees meetings (ibid.). These activities do not merely consist of researching and copy-pasting information but involve a significant amount of work to process information, conduct preliminary analyses and produce reports and documents in Italian language to assist the home administration (Interview 4).

1b) Besides the described activities, the office also monitors and signals financial opportunities although with less intensity than legislative and political developments (Interview 1-2-4). These do not qualify as fully-fledged funds-seeking activities but rather as a preliminary work. In practice they consist of: studying the available financial instruments, researching relevant call for proposals, assisting the partner searches for EU projects and drafting documents based on the information collected (interview 4).

2) The second main set of tasks are networking activities to which Piemonte's policy officers devote a lot of time and attention. The office's staff, every week, participates to: thematical networks meetings, networking events on issues of regional interests and other events organized by regional and institutional actors in Brussels (Interviews 2-3-4). These

networking activities have a twofold purpose. Firstly, they enable the policy officers to collect informal and sometimes privileged information. Secondly, they are instrumental for the building and maintenance of a web of personal relationships and to remain in close contact with colleagues and the professional community (Interview 2-3).

3) Finally, the policy officers are also required to perform a number of time consuming administrative tasks related to the practical running of the office, real estate activities and to the management of the building (Interview 3-4). This is due to the fact that in the Piemonte delegation in Brussels there are no purely administrative staff, such a secretary, like it is common in the Turin regional offices (Interview 2).

Besides the list of the practical activities performed by the policy officers, it is also interesting to analyse how they prioritize the different functions that the office performs on behalf of the regional administration. This is necessary to highlight the relevance in the practical running of the delegation of the function of representing the regional interest directly to the EU institutions. For this purpose, the respondents have been asked to rank in order of priority the different functions performed by the Brussels office. On this regard, a clear consensus emerged: what is considered to be the most important function of the delegation is to conduct activities of institutional lobbying meant to represent to the EU institutions the needs and interests of Piemonte establishing a direct dialogue with the EU decision-makers (Interview 1-2-3). Equally important is considered to keep the home administration in Turin constantly updated on EU policy developments reporting back about the dossiers of regional interest (Ibid.). This is confirmed by the words of the Director, according to which, for the Brussels office, *“the key words are to inform and to influence”* (Interview 1). Interestingly, funds-seeking, is not considered as one of the main reasons for the regional presence in Brussels since, in this regard, the Brussels office only represents a support to these activities that are predominantly carried out in Turin (Interview 1-2-4).

The interviews also explored the relationships of the Piemonte office with the other regional representations operating in Brussels. Besides the described established cooperation with the Regions of the Alps-Mediterranean Euroregion, the answers proved that the Piemonte office maintains contacts with a large number of other regional representations in the city (Interviews 2-3-4). Also, all the policy officers affirm that they take very much into consideration the practices and strategies of other Brussels regional

representations in their daily work (Ibid.). Interestingly, some respondents suggested that the rationale for the intense relationships maintained with other regional representations lies in the acknowledgement that Piemonte has some clear limits in terms of staff and budget compared to other larger representations (Interview 1-2-3). The Piemonte officers, therefore, look with interest at the practices of bigger delegations which are considered to be better able to monitor and be active on a wider range of dossiers. This benchmarking is done with the larger Italian and foreign regional representations and with regions that share economic and territorial similarities with Piemonte. More precisely, regarding the regional representation from other countries, the benchmarking is mostly made with German Landers, Spanish Autonomous Regions and Austrian Regions (Ibid.).

The policy officers working at Piemonte have stable and frequent contacts with the colleagues of the other Italian regions (Interviews 1-2-3-4; Observation). These are greatly facilitated by the *Network of the Italian regional offices in Brussels* (URC)⁸. URC is an informal platform created to strengthen the cooperation between the Italian Regions at the European level and to promote the dialogue between them and the European institutions (Regione Emilia-Romagna 2015). URC contributes to the effective functioning of regional offices in Brussels by enabling the rapid circulation of information and ensuring the availability of relevant documents to every member. The URC network enables the different regional offices to express their interest with “a single voice” in discussing with the EU decision-makers. The network is able to do so by involving the Italian officials working in the EU institutions and by working closely with the Italian Permanent Representation (Ibid.).

The interviews also elicited the respondents’ opinions on the added value of a permanent presence in Brussels for Piemonte Region. The responses highlighted three main dimensions.

The first advantage is said to lie in the shortening and facilitation of personal contacts. A stable presence in the “capital” of the EU facilitates, through constant personal interactions, the building and maintenance of a dense web of informal relationships with the policy community in Brussels (Interviews 2-3-4). Such a network enables the Piemonte policy officers to swiftly identify and reach the most appropriate person in the most efficient

⁸ URC: “Coordinamento degli uffici delle Regioni e della Province autonome Italiane a Bruxelles”

way, making their work faster and more effective than it would have been if performed remotely from Turin. Interestingly, all the respondents expressed the strong belief that, while with the current communication and streaming technologies all these relationships would be theoretically possible even without a physical presence in Brussels, these would however not take place in practice. The argument put forward is that by only staying in Turin: *“you would never get to be part of a community”* (Interview 2).

A second dimension, closely linked with the previous one, is that the employees working in the Brussels office have a superior knowledge of the EU activities and dynamics by virtue of working in the city (Interview 2-3-4). They are, therefore, better able to: understand what is going on in the “EU bubble”, spot opportunities and risks for the home region when they are still in a very early phase reading what the future trends will be. In this sense, the value of this presence for the Piemonte regional administration is effectively described as having a *“a window always open in Brussels”* (Interview 4).

Finally, the significance of a permanent regional presence in Brussels is said to be especially evident in terms of improved lobbying capacity. According to the words of the Director of the office the added value of such presence is *“to be able to participate to what happens in Brussels”* meaning to take part to the decision-making processes representing the interest and problems of the Region (Interview 1). The Brussels office is, in fact, described as *“the place where the lobbying strategies are designed and realized”* (Ibid.). The fact that the Piemonte office has the ambition to participate in the EU policy-making process by conducting interest representation activities in Brussels is a significant point that will be the subject of a more detailed analysis over the rest of the chapter.

4.2. The office’s lobbying

The description of the functioning of the office presented has highlighted that conducting institutional lobbying representing the interests of the Region to the EU decision-makers is considered the *raison d’être* of the office establishment in Brussels. In the

following, the general features of the lobbying activities conducted by the office will be presented in order to provide the context for the analysis of the case study on the future of Cohesion Policy which will be the subject of the next subchapter.

A first significant finding, in investigating the office's interest representation activities, is that the policy officers share a broad conception of what constitutes lobbying. From the interviews, in fact, emerges, that their concept of conducting lobbying also includes a wide set of preparatory activities (Interviews 2-3). These range from the monitoring of policy developments, to the networking and the relational activities linked to the membership in formal and informal networks as well as to the organization of workshops and public events (Ibid.). All these preparatory tasks, which are not strictly speaking lobbying activities, are nevertheless instrumental for the office to conduct interest representation in Brussels. They contribute, in fact, to the strategic "*positioning*" of Piemonte Region with regard the most relevant policy themes and enables it to identify the key players within the EU institutions (Interview 2). A solid network of contacts in Brussels and an operational knowledge of the newest policy developments are, indeed, considered essential elements to conduct strong lobbying initiatives towards the EU decision-makers (Interviews 1-2-3).

Not every policy officer is engaged to the same extent in conducting lobbying activities. This reflects a number of organizational arrangements and issue specific features (Interview 2-4). For example, with regard to the lobbying on the next EU budget (2021-2027), one of the three officers has not been directly involved in these activities (Interview 4). The other two policy officers and the Director, on the contrary, have been significantly involved in lobbying, particularly on the future of Cohesion Policy post-2020 (Interviews 1-2-3). The time spent by the policy officers on lobbying related activities it is said to vary significantly over the different weeks and between periods following the EU legislative cycles. In particular, this work gets very intense over the months ahead Commission's proposals or EP Committee debates, while at other times it consists mostly of monitoring the positioning of the relevant actors. In the office a shared belief exists that conducting lobbying activities is a very time-consuming and resources intensive task. Also, from some of the interviews, emerged that lobbying and other office's activities (among which notably administrative tasks) are competing tasks in terms of working time (Interview 1-2-3).

The research revealed that the main targets of the Piemonte Brussels office's lobbying are the European Commission and the European Parliament (Interview 1-2-3). The Commission is the primary target because of the office's preference for intervening on the legislative processes already during the first phases of formation and shaping of the proposals (Ibid.). In particular, within the Commission, the natural interlocutor for the Piemonte Brussels office is the Directorate General for Regional Development (Interview 1). In the case of lobbying initiatives aimed at establishing a political dialogue involving regional elected representatives, like the President of the Region or regional Ministries, the privileged targets are the Commissioners or alternatively their Head of Cabinet (Ibid.). On the other hand, to conduct a more informal policy-oriented dialogue and to obtain inside information before the presentation of the official Commission proposals, the interlocutors are the DG Regio policy officers. In this regard the interviews highlight that the Piemonte policy officers in Brussels have frequent contacts with the administrative structures of the European Commission of different DGs and have built a solid relationship with the Head of Cabinet of the Regional Development Commissioner (Interview 2-3).

With regard to the European Parliament, the office lobbying activities are described as focused predominantly on the proceedings within the Parliamentary Committees where the policies at stake are being discussed (Interviews 1-3). The MEP's elected in the Piemonte's constituencies are regarded as very significant partners within the EP (Interviews 2-3). These are four MEPs, including a former president of the Piemonte Region, with which the Brussels office established a solid interaction regardless of political affiliations. They are regarded as generally willing to exchange information, listen to the Region's instances and to work together on dossiers of regional interest. They are, in fact, natural allies in carrying out lobbying activities in the interest of their constituency. These contacts within the European Parliament are particularly relevant in terms of lobbying when these MEPs are relevant figures (rapporteur or shadow rapporteur) within the relevant Committees (Ibid.).

In trying to get access to the EU institutions to represent its interest, the Piemonte Brussels office is especially concerned with acquiring a good reputation and establishing credibility within the policy community in Brussels (Interview 1). The observation conducted between February and June 2018 revealed that the Piemonte representation does not generally make use of detailed policy dossiers with highly technical information, as it is suggested to be a common lobbying practice in the theory. On the contrary, the Piemonte

policy officers attempt to build a more political dialogue with the EU institutions using non-material lobbying resources such as legitimacy and political support. Piemonte Region, when conducting lobbying in Brussels, presents itself to the EU decision-makers as an institution of representative democracy acting on behalf of legitimate general interests and not as a private lobbyist defending specific self-interested positions (Ibid.).

A proof of the fact that the Piemonte Region is not willing to be put on an equal footing as private lobbying companies is that its office in Brussels refuses to subscribe to the EU transparency register (EP 2014). This register is a voluntary system of registration for the lobbyists seeking influence the EU decision-making processes (Mańko et al. 2014) established by the EP and the EC to regulate the lobbying activities. The registration is not compulsory for regional and local authorities, and the Piemonte office, in accordance with the other Italian regional representation and many other European regions, decided not to register as a “lobbyist” (Conf. Reg. 2011). This decision was motivated by the desire to reaffirm the special status of regional authorities as public decision-makers within the EU policy making processes (Ibid.). In approaching the EU institutions, Piemonte Region therefore claims to enjoy a distinct position in the EU lobbying arena by virtue of being a public authority defending a general interest. The argument put forward is that regional governments’ interests on the EU policy-making are different in nature from other lobbying organizations’ ones. This is a feature that, in the eyes of the regional practitioners, distinguishes the interest representation activities conducted by Regions in Brussels from the practices of “classic” lobbyists trying to influence the UE.

4.2.1. Relevance of networks and coalitions for the office’s lobbying

From the interviews emerges with clarity a full recognition of the importance of the participation to EU level networks of Regions for the office’s lobbying activities (Interviews 1-2-3-4). Besides the thematic networks of which Piemonte is a member, also ad hoc coalitions and alliances of regional actors are considered to be of particular value for the office’s lobbying. The value in terms of lobbying, of EU networks and informal coalitions of Regions is expressed by the respondents along three main interdependent dimensions.

The first argument is that, thanks to the interactions that take place within these networks, the Piemonte regional officers are able to access a large amount of detailed and policy relevant information which is instrumental to engage in interest representation activities (Interview 2-3). The amount of information that can be collected by a multiplicity of actors is significantly bigger and of better quality than what a single regional office in Brussels would be able to do alone (Interview 3). Within these networks, relevant intelligence (including sometimes privileged documents such as leaked drafts of Commission policy proposals) are circulated among the members. Moreover, networks are said to play a very important role not only in collecting and pooling intelligence, but also in helping their members “*to make sense*” of this information (Ibid.). Within the Brussels networks, in fact, regional officers are able to understand the potential impact and possible consequences for their home territories of policy developments by discussing events and news with colleagues from different regions, background, and expertise (Interview 3).

Secondly, the Brussels-based thematic networks, reuniting several regional governments, represent a natural platform for coalition building, organising and implementing lobbying activities. These networks are, in fact, regarded by regional officers as the main forum for the development of common position papers addressed to the EU institutions (Ibid 2-4).

Thirdly, the main added value lies indeed in the legitimacy that large transnational alliances of regions have in expressing a common position to the EU decision-makers (Interview 1-2-3). According to the respondents, a significant feature of the regional lobbying activities in Brussels is, in fact, to represent to the EU institutions how certain interests are not specific only of a single territory or region but are, effectively, common to a multiplicity of European citizens (Interview 1).

Following a representational logic according to which “*the more representative an actor, the greater its influence*” (Tatham 2015, 388), according to the respondents, to participate in large transnational coalitions created within the Brussels-based networks, would strengthen the legitimacy of the Piemonte’s lobbying efforts. The assumption behind coalition building efforts is that the European institutions, notably the European Commission, will have a preference for a collective and transnational interlocutor compared to the position of a single Region. Interestingly, the argument that influence in EU decision-making would

derive largely from effective coalition building in terms of size, demographic and political weight expressed in all the interviews finds confirmation in the academic literature on interest representation in the EU (Tatham 2015, Kluver 2011, Hogenauer 2015).

In concluding this section, the importance of the participation to formal and informal Brussels-based networks for the office's lobbying can not be overstated. They are, in fact, considered "*fundamental*" since as powerfully expressed in the interviews: "*thematical networks regardless of being more or less stable, big or rich represent an essential tool to carry out an effective lobbying activity*" (Interview 1) and also: "*to be part of networks means the survival of regional actors*" (Interview 3). The argument put forward is that, by acting alone, even the strongest and richest Regions of Europe could achieve very little in terms of effective policy influence within the EU decision-making process. It is, however, worth noticing that while conducting collective lobbying actions may strengthen the lobbying initiatives by ensuring more attention from the EU decision-makers this entails a number of compromises. With the words of one of the respondents, collective actions require, in fact, "*to water down a little the specific requests from Piemonte*" (Interview 2).

4.2.2. Relationships with the Committee of the Regions and the Italian Permanent Representation

Following the insights of the theoretical framework, the interviews investigated also the role and significance of the Committee of the Regions and of the Italian Permanent Representation for the lobbying strategies of the Piemonte in Brussels.

Regarding the Committee of the Regions (CoR), sometimes described in the academic literature as the strongest ally of Regions within the EU, the interviews highlighted that it has an "*extremely modest*" value for the Piemonte Region lobbying activities (Interview 2). Despite the acknowledgement that the Committee is very active in organising events, seminars and workshops on issues of regional interest (Interview 4), the Piemonte officers' judgments are very critical in terms of its added value for Regions seeking real influence on the EU decision-making. Because of its status of a "*merely a consultative body*" (Interview 1) only able to issue non-binding opinions, the perception of the policy officers is that the

CoR has “*no significant capacity of conducting a strong, solid lobbying towards the Commission, the Parliament and the Council*” (Interview 2). For these reasons, Piemonte has deliberately chosen not to have representatives within the CoR anymore since this collaboration is not considered strategic (Interviews 1-3).

The judgment on the significance of the collaboration with the Italian Permanent Representation is, on the contrary, very different. The interviews described a relationship characterized by factual collaboration on issues of common interest between the Piemonte Brussels office and the Italian Permanent Representation (Interviews 1-2-3). Maintaining a collaborative relationship with the National Representation is considered very strategic for Piemonte which, through this channel, strives for gaining an indirect access to the key decision-making processes taking place in the Council. The Italian regions representatives, in fact, do not participate in the Council of Ministers on issues of regional interest but take part only to the formation of the Italian position through domestic consultation through the national Conference of Regions (Interview 1).

While there is not open opposition linked to issues of regional autonomy as sometimes suggested in the literature, Piemonte Region and the Italian Government do, at times, defend slightly different interests (Interview 3). This takes places in the reciprocal respect of the respective competences: “*on complex dossiers it is possible to have positions which are no divergent but differently nuanced*” (Interview 1). This consideration showcases the added value for a Region of running its own office in Brussels which offers an unmediated channel of interest representation that does not require coordination with and approval of the central government. Having an independent presence in Brussels enables Piemonte to defend the specific interests of its territory more precisely and with less compromises presenting a more focused position (Interview 2-3). This would not be possible when relying only on the national Permanent Representation defending the Italian government’s position which is necessarily the result of compromises among the preferences of different regions and actors (Interview 1). As it will be shown, these dynamics took place also during the negotiations on the future of Cohesion Policy post-2020 which will be the subject of the next section.

4.3. Case study: Piemonte lobbying on Cohesion policy beyond 2020

After this general overview of the Piemonte Brussels office and of its approaches to interest representation, it is appropriate to focus the scope of the analysis on a specific policy issue in order to deepen the understanding of the way the office lobbies the EU. To conduct a similar in-depth case study will allow to closely investigate the lobbying strategies employed by Piemonte in Brussels following all the interactions and tracking precisely the different activities involved.

The focus of this case study analysis will be on the initiatives carried out by the Piemonte Brussels delegation regarding the future of EU Cohesion Policy as it will emerge from the European Commission proposal for the next Multiannual Financial Framework.

4.3.1. What is Cohesion Policy?

Cohesion Policy, also known as Regional Policy, is the main investment policy of the European Union. It was created in 1986 to support the creation of jobs, the competitiveness of firms, economic growth, sustainable development and the improvement of the quality of life through concrete projects across the Regions of Europe (EC Regional Policy 2018). Cohesion policy is implemented, over the current financial period (2014-2020), via the *European Regional Development Fund*, the *European Social Fund*, and the *Cohesion Fund* (Ibid). These three funds, together with the *European Agricultural Fund for Rural Development* and the *European Maritime and Fisheries Fund*, constitute the European Structural and Investment Funds (ESI) (Ibid.).

The ESI Funds are the instruments through which the EU pursues the Treaty objective of strengthening the economic, social and territorial cohesion of the Union (TFUE Art. 174). In particular Cohesion Policy's objective, as stated in article 174, is: "*reducing disparities between the levels of development of the various regions and the backwardness of the least favoured regions*" (ibid.). Cohesion Policy has, therefore, historically encompassed a clear

solidarity dimension having the explicit purpose of reducing disparities within the EU (Huguenot-Noël et al. 2017, 21).

The EU Structural and Investment funds are characterized by a shared management method. For funds in 'shared management', the Commission entrusts the Member States with implementing programmes at the national level. Consequently, in the case of Cohesion Policy, Member States then allocate these funds to regional authorities which are ultimately responsible for the implementation and management of Cohesion Policy funds (EC Regional Policy 2018).

In the present financial period, the funding for Cohesion Policy amounts to 351,8 billion € corresponding to a third of the entire EU budget, making it the largest in budgetary terms (ESI Funds 2018). Cohesion is currently a universal policy addressed to all EU citizens providing support for all the European NUTS 2 Regions. These are divided in three categories according to their regional GDP level. The funds are allocated among: less-developed regions (GDP per capita less than 75% of the EU average) which receive around 70% of the total, transition regions (GDP per inhabitant between 75% and 90% of EU average) and more developed regions (GDP per capita more than 90% of EU average). Additionally, about 3% of Cohesion Policy funds are used for the co-financing of projects for cross-border cooperation (Ibid).

4.3.2. An uncertain future for Cohesion Policy

During the months ahead of the Commission proposal, for the next Multiannual Financial Framework (foreseen for March/May 2018), serious and motivated concerns emerged regarding the future of Cohesion. The resources available after 2020 were projected to be drastically reduced and the policy reformed in an adverse direction for the European Regions (Margaras 2018). These alarms were primarily originated by the recognition that, in shaping the new budget of the Union, the Commission would have had to respond to new or growing challenges thus increasing expenditures in areas like security, migration and climate change. This was expected to result in a reduction of the EU budgetary

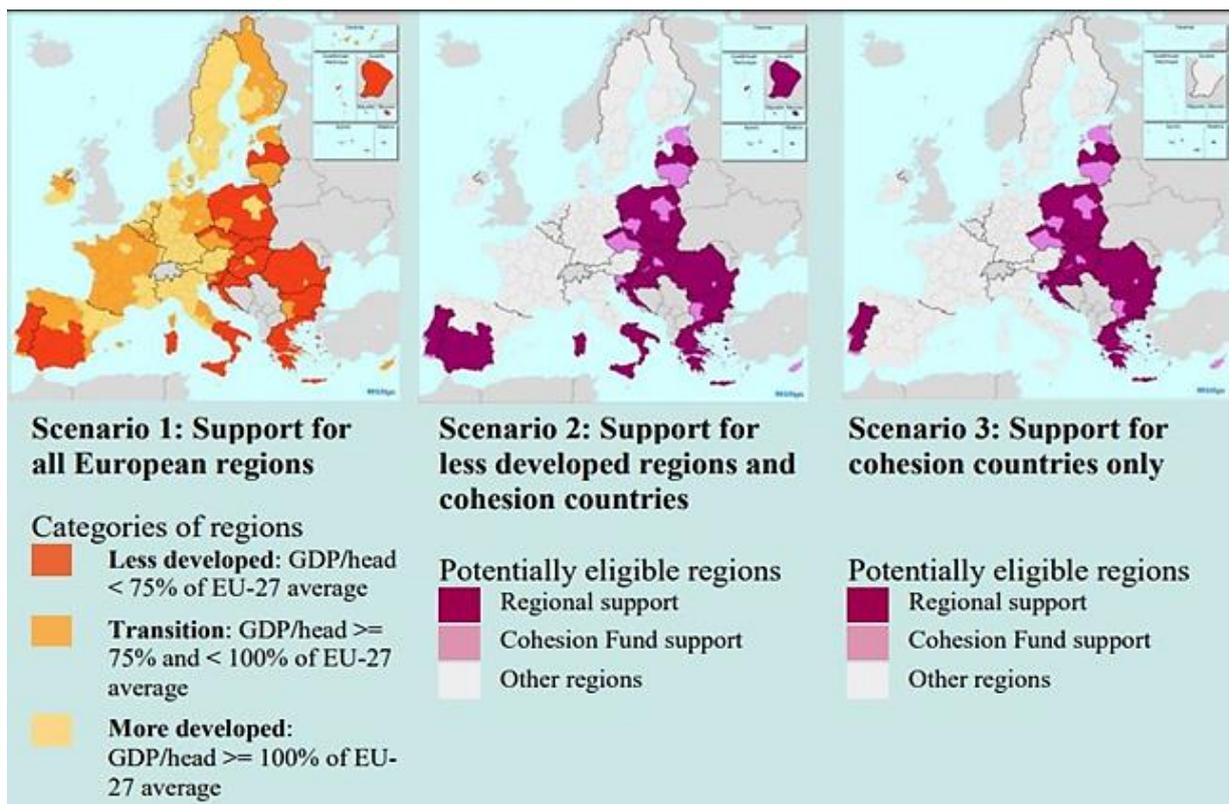
efforts on traditional policies, such as Cohesion Policy and the Common Agricultural Policy (Ibid.). At the same time, the departure of the United Kingdom was predicted to have a major impact in terms of missing contributions to the EU budget (Huguenot-Noël et al. 2017). This loss would have required the Commission to identify where savings could be made and where it was possible to deliver on priorities more efficiently (Margaras 2018). These two considerations highlighted that, over the next EU budget negotiations, there was going to be the need to rationalize the Union financial efforts and that a drastic reform of Cohesion Policy was going to be seriously discussed (Huguenot-Noël et al. 2017, 5). Between the end of 2017 and May 2018, the future of Regional policy appeared therefore very uncertain. For this reason, Commission's documents and white papers were monitored very closely by the community in charge of implementing Cohesion Policy, including regional and local authorities (Ibid. 7).

More concerns were sparked by the publication of the EC *"Reflection paper on the future of EU finances"* (2017) and by the results of the *"7th EC Report on Economic, Social and Territorial Cohesion"* (2018). In these documents the Commission suggested, besides the possibility of a reduction in the budget allocation for this policy, to strengthen the link between Cohesion funds and economic governance imposing stricter macroeconomic conditionalities. The idea suggested was to introduce the possibility for the Commission to impose sanctions, such as the suspension of funds, to enforce compliance with the EU budgetary rules on Member States. The proposed stricter macroeconomic conditionalities generated the strong opposition of the Cohesion Policy community. This issue is, in fact, a highly debated and divisive one, hence some Member States and many Regions emphasized that Cohesion Policy should guarantee investments and not be used as tool for delivering structural reforms compromising its original mandate of economic and social convergence (Margaras 2018, 3; Huguenot-Noël et al. 2017, 5). In this regard they also highlighted the existence of a conflict between the stability objectives of macroeconomic conditionality and the Cohesion Policy's pursuit of growth and investment (Ibid.).

The Regions' concerns over the direction of the reform of Cohesion Policy were confirmed by the EC Communication of the 14th February 2018: *"A new, modern Multiannual Financial Framework for a European Union that delivers efficiently on its priorities post-2020"*. Here the hypothesis of cutting the resources devoted to Cohesion Policy and to reduce the scope of its territorial coverage were openly discussed. In this Communication,

the EC highlighted the need for savings and redeployments within the EU budget in order to deliver on the new priorities, suggesting also that the next MFF was going to be “*increasingly focused on programmes directly managed at European level*” (Ibid., 3).

Regarding the future Cohesion Policy, three different scenarios were presented in the document together with the different state of coverage that they would have entailed (see picture below). Only the first scenario envisaged the coverage of all the EU Regions. The second one foresaw that Cohesion funds could be reserved only to less developed and transition Regions. Under this scenario support would be have been discontinued for many Member States⁹ and for most of the Italian regions, including Piemonte. According to the third scenario support would be further restricted only to Cohesion countries¹⁰ and the support would have been completely discontinued also for all the less developed Regions of France, Italy and Spain (Ibid. 11).



⁹ Austria, Belgium, Denmark, Finland, mainland France, Germany, Ireland, Netherlands, Sweden

¹⁰ A Member State is defined as Cohesion Country if its Gross National Income (GNI) per inhabitant is less than 90 % of the EU average.

Besides these worrying scenarios coming from the Commission, an intense political debate was under way with a growing number of critical and sceptical European actors questioning the utility of Cohesion Policy demanding its funding to be significantly reduced within the next EU budget (Margaras 2018; Huguenot-Noël et al. 2017). In this context, it became evident, as expressed on many occasions by the Commissioner for Regional Policy Corina Crețu over those months, that the future of Cohesion was going to: “*depend on providing convincing arguments regarding the added value of the policy and its results*” (Margaras 2018, 6).

Several Regions, among which notably Piemonte, mobilized, putting forward proposals for a renewed and strengthened Regional policy, in order to safeguard, as much as possible, adequate funding for Cohesion Policy beyond 2020. The mobilization of regional governments was motivated not only by their direct financial interest, but also by the Regions’ commitment to defend their role as implementing bodies demanding more participation in the implementation and greater autonomy in the management of funds.

For these reasons, anticipating the concrete risks linked to the EC proposal (Margaras 2018) many regional and local actors, already at an early stage of the policy process, engaged in a significant number of collective lobbying actions at the EU level. These lobbying efforts were mainly directed towards the Commission which, by the end of March 2018, was going present a proposal for the next Multiannual Financial Framework that was going to form the basis for the negotiations on the EU budget post-2020. Also, by the end of May the EC was going to present the proposal for the specific regulations of the different funds composing Cohesion Policy.

4.3.3. The position of Piemonte Region on the future of Cohesion Policy

In the context outlined, Piemonte Region had a direct interest in the future of Cohesion Policy by virtue of being managing authority of the *European Regional Development Fund* (ERDF) and of the *European Social Fund* (ESF) regional programmes. In particular, the ERDF financial allocation alone, over the period 2014-2020, amounted to 695 million of euros for Piemonte (EC 2014). This highlights the saliency for Piemonte regional government of trying

to participate and influence the decision-making on the future of EU Regional policy. Facing a concrete risk of seeing its Structural funds discontinued or drastically reduced in the near future, the Region, has been actively engaged in intense lobbying on the future of Cohesion Policy. These interest representation activities, have been designed and conducted mostly through the Region's office in Brussels (Interviews 1-2-3).

Analysing Piemonte Region's position and preferences on the future of Cohesion Policy is an essential first step to understand the various lobbying activities undertaken by its Brussels office. The official position of the Piemonte regional government can be derived from the position papers which has contributed to draft or signed. In the following the main aspects of Piemonte's position on Cohesion Policy post-2020 together with its proposals for reforming the Structural Funds are summarized and briefly presented:

- 1) Cohesion Policy should continue covering all European Regions, drawing on the potential of its most-developed Regions.
- 2) Cohesion Policy post-2020 should be endowed with a financial envelope, at least equal to the resources allocated in the current MFF. An adequate level of financing for all European Regions is deemed to be the necessary precondition for a credible implementation of this policy.
- 3) Regarding the envisaged reform of the allocation criteria for the distribution of Cohesion Policy envelopes between Regions, Piemonte suggests supplementing the current criteria of the regional GDP per capita with other complementary indicators (such as unemployment, youth unemployment, air quality, vulnerability to climate change), to better reflect the challenges faced by European Regions.
- 4) Piemonte demands increased recognition of the role of regional administrations in the implementation and management of Structural Funds. In particular it defends the shared-management nature of the European Social Fund.
- 5) With regard to the discussed strengthening of macroeconomic conditionalities, Piemonte insists that the new Cohesion Policy should only be linked to conditionalities having a rewarding and non-punitive nature. The macroeconomic conditionalities and the linkages with the European Semester, should be identified on the basis of the positive effects that their respect would entail for the specific purpose of Cohesion Policy. In order to avoid a renationalization of this policy they should only be applied to the extent that is it the responsibility of regional administrations to respect them.

- 6) It is necessary to reduce the administrative burden on the managing authorities simplifying the rules for management and controls. This should be realized, for example, by merging the various Fund-specific regulations into a single regulation.
- 7) It is important to strengthen the "bottom-up" approach of Cohesion Policy allowing regional authorities greater flexibility in the choice of the priorities, in accordance with the principle of subsidiarity, especially to tailor them to new social and territorial challenges.
- 8) Finally, Piemonte suggests the need to reform this policy in the direction of an improved visibility in order to enhance the citizens' awareness and maximise its impact through a strong focus on the communication of results¹¹.

Having outlined the position of the Piemonte Region on the future of Cohesion Policy, it is now possible to investigate the practical lobbying activities and the tactics deployed by its Brussels office to defend these positions before the EU decision-makers.

4.3.4. Lobbying strategies and initiatives

In the following the interest representation activities conducted by the Piemonte Region to defend the regional interest on Cohesion Policy post-2020 will be presented highlighting the channels employed, the partners and lobbying coalitions used as well as the institutional targets of these initiatives.

A first significant feature of Piemonte's lobbying on Cohesion policy is that the preparatory work, composed of monitoring, strategic networking and coalition building, had already begun in Autumn 2017, several months ahead of any official proposal on this theme. At this point, very little information was available and no official document revealing the Commission's intentions had been presented. Over the last months of 2017, the Piemonte Brussels office's efforts to anticipate the risks coming from the EC proposals for the next MFF and the new Structural funds regulations, revolved around interpreting general Communications on the future of the UE, unsanctioned memos and a number of unofficial

¹¹ For a more detailed account of Piemonte Region position on Cohesion Policy beyond 2020 see: *Annex 3: Document Analysis: List of papers and files consulted*

documents that filtered from the European institutions (Interview 2). The first necessary step to prepare an interest representation strategy was, in fact, to understand the views of the Commission and mapping the political context around the issues identifying the key actors in the decision-making process and their preferences.

Particularly noteworthy, in this regard, is the fact that the Piemonte office, as the other Italian regions in Brussels, collaborated closely with the Italian Permanent Representation to monitor policy developments within the Commission as well as the Member States orientations in the Council. This collaboration has been conducted in the framework of the informal network of Italian regions in Brussels (URC). This network established a working group specific for Cohesion Policy and in, this framework, a number of meetings with experts from the Italian Representation and from the Commission were organized over the months leading to the EC proposal. (URC 2018).

At the same time the office was engaged in building or reactivating partnerships and coalitions of European Regions in order to defend the regional stances on the future of Cohesion Policy. These networking activities conducted by the office, in this phase, proved very helpful in collecting privileged information and, subsequently, in developing joint lobbying initiatives.

From February 2018, in the months ahead of the Commission proposal, the Piemonte Brussels office played a central role in developing and expressing the official position of the Region on the future of Cohesion Policy (Interview 1-2-3). The office has, for example, been in charge of drafting, finalizing and submitting, on behalf of the President of the Region, the official response of Piemonte to the Commission Public Consultation on EU funds in the area of Cohesion (EC Consultation 10 January 2018 - 9 March 2018). This online consultation was launched in preparation for the next MFF and took place between January and March 2018. Over the process of preparing the official regional contribution, the Brussels office consulted with the relevant actors in the home administration collecting feedbacks and contributions. The office's work also aimed at ensuring consistency and coherence among the many position papers and joint statements signed by the Region regarding the future of Cohesion Policy. At the same time the office was part of a dialogue within the network of the Italian regions in Brussels (URC) and with the national Ministry in charge of regional development to coordinate the regions individual answers to this consultation. The objective

of these efforts was to ensure a degree of consistency in the contributions of the Italian regions and, by reaching critical mass, send a stronger message to the Commission's decision-makers.

However, the online format of the consultation being quite strict, with a lot of standardized and closed questionnaires, left little room to express the Region's position extensively and with clarity. Moreover, the fact that the EC public consultations are open to all stakeholders (both individuals and organisations) interested in Cohesion policy and not only to regional authorities, further limited the potential impact of Piemonte's response in terms of effective influence. Therefore, despite Commission's assurance that the contributions were going to be taken into account in designing the proposals for the future generation of financial programmes, this consultation was not considered a satisfying channel to express the Piemonte Region position with the necessary strength and clarity.

For this reason, over the months ahead of the EC proposals, Piemonte represented its interests on the future of Cohesion Policy in several ways and across multiple levels (Interviews 1-2-3). At the individual level, besides the described participation to the open consultation, the strategic choice has been not to present an individual position paper. The Region's approach has been, instead, to resort to collective interest representation actions. The rationale behind this lobbying strategy was that, by building lobbying coalitions with other regional actors, it would have been possible to enhance the impact of the Piemonte's interest representation efforts (Ibid).

These lobbying coalitions are partnerships of political entities with a common interest on the future of Cohesion Policy and a commitment to defend these interests within the EU decision-making process. Within these coalitions the main lobbying tactic employed has been to produce and circulate joint position papers containing a number of requests and proposals on the future of this policy. Through the presentation of position papers, the Regions wished to participate in the policy debate over the future of Cohesion policy highlighting the legitimacy of their claims that derives from their nature as managing and implementing bodies of this policy. In general, these documents emphasize the significant results already achieved by Cohesion Policy in the European Regions and highlight the political support behind the positions presented often insisting on the transnational nature of the coalition which is described as expressing genuine and general European interests

(Interview 1). These position papers have often been presented by organising public events held in Brussels with the participation of guests of high political profile both from the sponsoring Regions and from the European Commission.

Piemonte has promoted and participated to many of these collective lobbying initiatives culminated in the presentation of a position papers addressed to the EU decision-makers. The most significant initiatives will be briefly presented in the following, highlighting the role played by the Piemonte Brussels office as well as the partners and the targets of these activities.

- *The position of the Italian Conference of Regions and of the Italian Government*

Firstly, Piemonte Region has actively taken part to the discussions on Cohesion Policy post-2020 at the national level (Interview 1). In particular, it has contributed to the formulation of the official position of the Conference of the Italian Regions on this theme titled “*The future of Regional Cohesion Policy*” (Conferenza delle Regioni e delle Province Autonome 2017). The work within the Conference of the Italian Regions has concretely mostly been carried by the Region’s office in Rome but the inputs and information collected by the Brussels office have, nevertheless, been instrumental in this process (Interview 1). Moreover, it is important to report that the Italian Regions also contributed to the definition of the official position of the Italian Government on the future of Cohesion Policy: “*Posizione Italiana sulla Politica di Coesione post-2020*” (Presidenza del Consiglio dei Ministri 2017). Notably, this reflects all the main requests expressed by the Italian Regions. This is very significant considering that having the support of the national government in the complex and long debate over the future of Cohesion Policy greatly enhances the regional chances of obtaining a positive outcome as result of the negotiations (Interview 1).

- *“A strong renewed Regional Policy for all regions post-2020”*

This lobbying initiative was launched already in September 2016 by the Lower Austria regional office in Brussels. The Piemonte Brussels office contributed to the drafting of the

The presentation of this position paper took place on the 20th of March 2018 during an event which objective was to reunite the five Presidents of the ERAM Regions in Brussels to meet with the relevant Commission decision-makers, thus maximizing the political impact of the initiative. At the last moment the President of Piemonte Region has not been able to attend the event but was substituted by the regional Minister for Productive Activities. The delegation composed of the elected representatives of the five Regions was received by the Commissioner for Budget Günther Oettinger to discuss their proposal for on the future of Cohesion Policy. This Commissioner, being personally in charge of the EC proposal for the next MFF, represented a key strategic target for this lobbying initiative. On the same day, the delegation also met with the Heads of Cabinet of the Vice President of the European Commission Jyrki Katainen (Commissioner for Jobs, Growth, Investment and Competitiveness) and of the Commissioner for Regional Development Corina Crețu (Observation 20/03/2018).

This lobbying event was entirely organized by the Piemonte Brussels office, in collaboration with the offices of the partner Regions (ibid.). Thanks to this initiative Piemonte region has been able to reach and establish a political dialogue with the key actors within the Commission. The drafting of this common position paper, over which the Piemonte Brussels office took a leading role, offered the Region the opportunity to present a more detailed and focused proposal on the desired reform of Cohesion Policy, compared to the lobbying initiatives described earlier. The Euroregion Alps-Mediterranean is, in fact a smaller and more homogeneous in terms of preferences on Cohesion Policy beyond 2020 (Interviews 1-2-3).

After the event of the 20th of March, the position paper of the Euroregion on the future of Cohesion Policy has been distributed to a wide range of stakeholders and key EU decision makers. In particular, each of the partner Regions ensured the circulation of the position paper among its regional stakeholders. The Piemonte Brussel office has also been in charge of its wider distribution by email. The targets of this communication activity have been, among others: the President of the European Parliament, all the members of the European Parliament Committees “*Regional Development*”, “*Budgets*” and “*Employment and Social*

Affairs” as well as various EC Commissioners and their cabinets (Annex 3: Document Analysis: List of papers and files consulted)

- “#CohesionAlliance”

This initiative, promoted by the Committee of the Regions in cooperation with the leading European associations of cities and regions, aimed at forming a large coalition of stakeholders who believe that Cohesion Policy must continue to be a key element of EU action beyond 2020 covering all European Regions. This alliance demanded that the future EU budget strengthens Cohesion Policy making it more effective, visible and addressed to every Region in the Union. This lobbying coalition has collected to date over 5600 signatures and its institutional supporters represent over 97% of the EU population. This initiative entails, therefore, a very significant political significance and has so far expressed a great communication potential thanks to an effective presence over social media (Cohesion Alliance 2018).

Piemonte Region joined the Cohesion Alliance and the official signature took place on the 20th of March 2018 in the presence of the President of the Committee of the Regions Karl-Heinz Lambertz and of the press. On the same day of the presentation of the ERAM position, in fact, the representatives of the five regions met with the president of the CoR in their premises where they presented to him their common positions and jointly signed the Cohesion Alliance publishing a joint press release to ensure the most effective communication of the event (CoR 21 March 2018).

In concluding this section, it is worth mentioning that the office’s lobbying initiatives on the future of Cohesion policy included also the close monitoring of the developments within the European Parliament which is considered a potential ally in the upcoming negotiations on the future EU budget (interviews 1-2-3). Over the months under scrutiny, the European Parliament adopted two resolutions on the future of Cohesion Policy expressing positions close to the Piemonte Region’s preferences. In June 2017, the EP adopted the resolution *“Building blocks for a post-2020 EU Cohesion policy”* where the MEPs considered essential for Cohesion Policy to have an adequate budget after 2020 and highlighted the importance

of the concrete application of the shared management principle as well as the need for simplification in the future Structural Funds regulation. In April 2018, the EP expressed again its position on this theme adopting the resolution: *“Strengthening economic, social and territorial cohesion in the European Union: the 7th report of the European Commission”* where it reemphasized that the Cohesion Policy coverage of all European regions represents a not negotiable principle for the European Parliament. On both occasion the Piemonte Brussels office has followed closely the adoption of the resolutions establishing a dialogue with some of the Piemonte MEP’s in the relevant parliamentary Committees (Interview 2).

4.3.5. The Commission proposals for the next MFF and the Structural Funds regulations

On the 2nd of May 2018 the European Commission officially presented the budget proposal: *“A Modern Budget for a Union that Protects, Empowers and Defends. The Multiannual Financial Framework 2021-2027”*. On the 29th of May 2018, also the proposals for the specific regulations of the new Cohesion Policy funds were adopted (EC 2018c). While the objective of this study was not to determine the exact lobbying influence of a single Region on the policy debate surrounding the future budget of Union, it is nevertheless relevant to analyse the Commission proposals. These have been, in fact, the subject of all the interest representation activities described so far and their analysis will complete the presentation of the results of the case study on Piemonte’s lobbying on Cohesion Policy. This examination will be instrumental to outline the policy outcomes of these lobbying efforts and describe what the next steps for the Brussels office will be.

From the perspective of Piemonte Region, the EC proposals for the future EU Budget and Cohesion Policy are considered broadly satisfying. They incorporate the majority of the key points defended by the Brussels office with the lobbying activities described. In fact, according to the Commission proposals, which will form the basis of the upcoming negotiations, despite the initial concerns:

- Cohesion Policy will continue to cover all European Regions including the most developed ones and it will remain the largest EU investment policy with a total budget of 373 billion euros (current prices considering inflation) for the period 2021-2027.
- The three categories of Regions (less developed, transition and more developed) for the allocation of the Cohesion Funds are maintained. However, while GDP per capita will remain the main criterion to allocate Cohesion funds, additional criteria such as youth unemployment, low education level, climate change as well as reception and integration of migrants will be introduced to better reflect the reality of European regions.
- The shared management approach of Cohesion Policy is safeguarded, and the territorial authorities will be more involved in the management of the Cohesion funds.
- A single rulebook for all shared management funds is introduced thus simplifying the rules for the management and controls of Cohesion policy (Dobрева 2018; EC 29 May 2018).

In the proposals there are, however, also a number of critical and unsatisfactory points which will require further attention and lobbying efforts over the course of the upcoming negotiations. From the Piemonte Region's perspective, the main concerns regard:

- The evident strengthening of Cohesion Policy's link with the European Semester through the introduction of stricter macroeconomic conditionalities on the allocation of the funds.
- The proposed reduction in the total allocation for Cohesion Policy post-2020 which will suffer a cut between 7% and 10% compared to the financial period 2014-2020 (Dobрева 2018; EC May 2018).

It should be noted however that the actual reduction in the budget of Cohesion Policy in the Commission proposal for the next MFF is significantly less accentuated than feared. Moreover, despite the proposed overall cut in the Cohesion's resources, for Italy the total allocation is projected to grow after 2020 of approximately 6% (at current prices 2018) compared to the present financial period (Beda Romano 2018). The confidential sources of the Brussels office foreseen that this could also translate in a rise in the Cohesion Policy allocations for Piemonte Region. The projected increase in the Cohesion funding for Italy will

be the result of the negative effects of the persistent economic and social crisis affecting the country but also of the proposed readjustment of the allocation criteria that advantages Southern European countries to the disadvantage of Eastern countries. The largest share of the reduction in the total allocation of Cohesion Policy has been suffered, in fact, by the Cohesion Fund of which Italy was not a beneficiary (Dobрева 2018; EC 29 May 2018).

What has been described so far, are the results of the Commission proposals which will be the subject of intense negotiation and fierce Member States bargains over the following months. Hence the European regions, and the Piemonte Brussels office particularly, are likely to continue monitoring this policy closely and continue to engage in lobbying on this regard. However the targets will change, from the European Commission the focus will move towards the European Parliament and towards the negotiations happening in the Council.

This chapter has been dedicated to the presentation of the empirical results of the research on the lobbying activities of the Piemonte Region office in Brussels. In chapter 5 these findings will be discussed in order to answer the research question and develop a number of recommendations for the improvement of the office's interest representation activities in Brussels.

Chapter 5. Conclusions

The objective of this thesis has been to investigate in what ways Piemonte Region lobbies the EU institutions through its office in Brussels. In the following, in order to present a more structured overview of the results, I will address each of the nine sub-questions elaborated in Chapter 2 providing a synthesis of the main findings. This will allow to summarize the study's outcomes and answer the main research question. Subsequently I will discuss the thesis' theoretical and societal implications as well as its impacts for Piemonte regional administration and for the Brussels office. This will be followed by some critical remarks on the strengths and limitations of the research design. The last section will be dedicated to developing four strategic recommendations to improve the lobbying conducted by Piemonte Region in Brussels.

5.1. Answers to the research sub-questions

SQ.1: Which of the activities ascribed to Brussels-based regional offices in the academic literature does the Piemonte Region delegation serve? How are these functions prioritised?

The research has shown that the Piemonte Brussels office functions as the operational and political link between the regional administration and the EU institutions. Even though the practical activities performed by the policy officers are found to be variable over time, this study identified three main sets of tasks:

1) Collecting and processing relevant information to make it readily available for the regional administration. In particular, the Brussels office is found to serve as an “early warning system” primarily focused on monitoring legislative and regulatory developments rather than on substantial funds-seeking.

2) Conducting networking activities through participation to public events and thematical networks meetings. This is instrumental to build and maintain a valuable web of personal relationships within the Brussels' policy community which are regarded as the "cornerstones" of lobbying in the city.

3) Performing administrative tasks and other functions linked to the practical running of the office in Brussels.

With regard to the functions performed by the office on behalf of the regional government, the results proved the high relevance of lobbying activities. The research, in fact, highlighted that the first priority is to conduct lobbying in Brussels representing Piemonte's interest to the EU decision-makers. Equally important is considered to keep the home administration constantly updated over risk and opportunities arising from the policy developments happening within the EU.

SQ. 2: What are the institutional, administrative and political features of Piemonte Region that determine its lobbying activities in Brussels?

Piemonte is a Region endowed with substantial political, regulatory and financial autonomy having its Regional Statute, powers and functions recognized by the Italian Constitution. In Italy the Regions enjoy legislative powers on a significant number of policy areas. This constitutional strength is particularly noteworthy for the purpose of this study since it is positively correlated to Piemonte's mobilization at the EU level.

The Regional Statute provides for Piemonte to have an elected Regional Council and a government led by a directly elected President. The legal basis for the participation of Piemonte to the determination of EU policies and the duty to implement relevant EU law are also contained in the Statute. From an organizational point of view, the Brussels liaison office depends directly from the Cabinet of the Presidency and is part of the sector "*Institutional Affairs and European Affairs*" of the regional administration. The Brussels office, in addressing the EU decision-makers, is therefore able to express the official position of the

Piemonte regional government which is the legitimate representative of the general interest of over four million of European citizens.

SQ. 3: To what degree is the Piemonte Region delegation in Brussels engaged in attempts to lobby the EU decision-making process?

The research conducted revealed that Piemonte Region has the clear ambition of having a say within the EU decision-making processes concerning issues of regional interest. To this end, it is significantly engaged in lobbying activities directed to the EU institutions. The main instrument to realize this participation is found to be the delegation in Brussels. To express the regional interests in the EU establishing a direct dialogue with the EU decision-makers is, indeed, one of the formal statutory objectives of the Brussels office and the interviews proved that this is considered the main “*raison d’être*” of the regional presence in the city. The findings confirmed that the Brussels delegation is the place where regional lobbying strategies are designed and implemented.

The policy officers have a comprehensive understanding of what constitutes lobbying. In this regard, the research highlighted the key role of preparatory work in conducting lobbying activities in Brussels. These preparatory tasks, including monitoring of policy developments, strategic networking and the organization of public events, are considered essential in enabling the office to conduct effective interest representation activities at the EU level.

SQ. 4: What are the material resources at the disposal of the Piemonte Region office in Brussels?

Piemonte Region delegation in Brussels is currently composed of three permanent policy officers, each of which is supported by a trainee. The policy officers have divided among them the different EU policy areas of regional relevance. The office is managed by the Head of the “*Institutional Relations and European Affairs*” sector who works between the Rome, Turin, and Brussels offices. The Region does not employ external consultants to conduct its interest representation activities but relies on its Brussels-based officers which

are regional employees. The office is strategically located at the hearth of the EU district in Brussels and is equipped with meetings room and facilities suitable to host large institutional events. This building has also become a hub reuniting the regional delegations of the neighbouring Regions. The research, and especially the case study conducted, have highlighted that these material resources play a key role in sustaining the office's lobbying while also represent the physical limits to its lobbying capacity.

SQ. 5: *What are the non-material resources and how are they used?*

With regard to the use of non-material resource in conducting regional lobbying in Brussels, the research uncovered a surprising finding. As a general rule, according to the majority of studies on lobbying within the EU, interest groups trade expertise and highly technical information in exchange for access to the policy-making process (see for example: Hogenauer 2015). However, the close investigation of Piemonte's lobbying activities revealed that, when trying to get access to the EU decision-makers, the policy-officers do not produce and share detailed policy dossiers or highly technical information. On the contrary, Piemonte Region prefers to build a dialogue of a political nature with the EU institutions. In doing so it makes use of non-material resources such as political clout and legitimacy deriving from being a public authority representing the general interests of its citizens. Mobilizing political support and claiming to act on behalf of legitimate general interests and not as lobbyist defending private concerns, the Region wishes to enter in a political dialogue and thus influence the outcome of the EU policy processes.

The research also highlighted the key role of other non-material resource such as reputation, credibility and, notably, the human capital embodied in the office's staff. The policy officers' solid experience of EU affairs as well as their Brussels-based social connections represent, in fact, an essential asset enabling them to reach the key actors within the EU institutions.

SQ. 6: Who are targets and institutional counterparts of the lobbying activities conducted by the Piemonte Region through its Brussels office?

The primary targets of Piemonte Region lobbying in Brussels are the European Commission's administrative structures, the policy officers and the Commissioners themselves as well as the elected representatives in the European Parliament. In particular, the EC is found to be the subject of intense regional lobbying due to its role of agenda setter in the EU policy processes. Within the European Parliament, the Piemonte Brussels office especially interacts with the four MEPs elected in its constituency which are described as generally responsive to the regional stances. Therefore, they are regarded as natural allies for the Region's lobbying initiatives.

SQ. 7: What is the role and significance of the Committee of the Regions and of the Italian Permanent Representation in Brussels for the lobbying conducted by Piemonte Region?

The research revealed that the Committee of the Regions does not represent a significant lobbying channel for the Piemonte Brussels office. The policy officers consider this consultative body as having a very limited potential in terms of decisive lobbying actions towards the other EU institutions. Piemonte Region has, therefore, decided to not invest resources in actively participating to the CoR activities.

On the other hand, the Italian Representation in Brussels is regarded as a very strategic partner in lobbying the EU decision-makers. As it is the case for the other Italian regional representations, the collaboration between the Piemonte Brussels office and the Italian Representation is frequent and conducted in the spirit of factual collaboration on dossiers of common interest.

SQ. 8: What is the role and significance of the Region's participation to networks and ad-hoc coalitions for its lobbying activities in Brussels? Who are the partners and the alliances of Piemonte Region with regard to its lobbying activities?

The main findings of this research concern the value of Piemonte Region's participation to networks and ad-hoc alliances for its lobbying activities in Brussels. The

study demonstrated that to be part of such networks and coalitions, regardless of them being more or less formal, is considered fundamental to conduct regional lobbying in the EU. Regional authorities in Brussels, in fact, rarely lobby “solo” since large transnational lobbying coalitions provide more legitimacy in addressing the EU institutions. These coalitions are created on the basis of specific common interests and find their strength in the political support they are able to mobilize and coordinate to impact the EU policy-making. In this regard, the research revealed that coalition building represents the main lobbying strategy employed by the Piemonte Brussels office.

Piemonte Region is found to maintain contacts with a wide range of actors in Brussels and to rely on various networks and ad-hoc coalitions to conduct its interest representation activities. The advantages for the office from the participation to Brussels-based networks are: improved access to policy relevant information and enhanced understanding of the consequences for the Region of EU policy developments.

One of the main lobbying coalition for the Piemonte Brussels office is the Alps-Mediterranean Euroregion reuniting five French and Italian neighbouring Regions having a common premise in Brussels. This Euroregion represents a solid and established base for the exchange and pooling of information as well as for the development of joint lobbying initiatives. Also, the research revealed that a number of Italian and foreign regional delegations in Brussels are key lobbying partners for Piemonte. The collaboration with the other Regions of Italy is realized primarily in the framework of the Network of the Italian regional offices in Brussels (URC) which also facilitate Piemonte’s dialogue with the National Permanent Representation.

SQ. 9: What are the lobbying tactics used by the Piemonte Brussels office to represent its interest to the EU institutions? Does it resort predominantly to inside or outside lobbying tactics?

The research revealed that, in practical terms, the lobbying methods for defending the regional interests in Brussels include:

- preparing, circulating and communicating position papers expressing the preferences of the regional government;
- contacting officials within the Commission as well as MEPs and parliamentary assistants within the European Parliament;
- arranging high level meetings of the regional political representatives (President, Ministers or directors) with top EU officials or Commissioners;
- contributing to the voluntary responses and participation in the EC consultations on upcoming EU legislation.

The study has allowed to identify and analyse the lobbying tactics used by the Piemonte Brussels office to influence the EU policy-making processes of regional interest. The results revealed that the office adopts a pragmatic and realist approach to lobbying, conscious of its limitations in terms of resources and formal powers but proactive in exploiting the opportunities offered by the informal governance processes happening in the city. Its lobbying activities are predominantly realized in coalitions with other regional actors and often in coordination with the Italian Permanent Representation. In particular, Piemonte is found to rely almost exclusively on inside lobbying tactics trying to establish a direct dialogue with the key-decision makers within the EU institutions.

This preference for inside lobbying reflects the institutional nature of its presence in Brussels through an office representing a directly elected public authority which claims to legitimately defend the interest of its citizens within the EU policy process. The office's lobbying approach towards the EU is therefore found to be not confrontational but generally cautious and constructive aimed at establishing credibility and reputation within the EU policy community. The research also highlighted the value of informal contacts within the European institutions, particularly the Commission, in getting access to the most updated and sometimes confidential information and in reaching key actors, such as the Commissioners or their Heads of Cabinet.

5.2. Implications of the research

In the following paragraphs, I will present a number of concluding remarks on the implications of the thesis for the academic theory, the societal and political debate on the future EU budget as well for the Piemonte Region's presence in Brussels.

From a theoretical point of view, this research contributed to filling a gap in the academic literature regarding the EU multilevel lobbying arena, by in-depth investigating the interest representation strategies employed by Piemonte Region through its delegation in Brussels. For this purpose, the research combined two distinct but complementary fields of research: the studies on Brussels-based regional delegations and the theories of lobbying within the European Union. Having explicitly connected these two research streams has proved very fruitful and revealing in deepening the understanding of the ways a Region can represent its interests vis a vis the EU decision-makers. That is why, I believe that this approach and the thesis' analytical framework have some potential in guiding future investigations of the lobbying practices of other subnational authorities within the EU multilevel governance.

To fully evaluate the theoretical implications of this research it is interesting to consider how its empirical results are connected to the academic literature on subnational delegations to the EU and on interest groups studies. This can be done by critically comparing the outcomes of the literature review conducted in Chapter 2 with the research empirical results. Overall, the results of this study on Piemonte representation in Brussels corroborate and expand on the insights of the literature regarding the practices of regional delegation to the EU and the functions they perform on behalf of their home-administrations. More specifically, the close investigation of the lobbying conducted by the Piemonte Brussels office has emphasised the relevance of coalition-building in enabling Regions to reach the key EU decision-makers expressing a strong and politically legitimate positions. These findings also confirmed the claim, expressed in the interest groups theories, of the key role played by non-material lobbying resources such as legitimacy, reputation and political clout in terms of interest representation within the EU system. Finally, the research has highlighted how the European Regions in Brussels can effectively be conceptualized as

a peculiar but very relevant category of interest groups active in the EU governance arena. The study, in fact, demonstrates that, while they constitute public authorities representative of the general interest of their citizenry, in Brussels, they behave as lobbyists defending their specific regional stances by means of fully-fledged lobbying activities.

This research's findings also have a distinct theoretical value in the context of the multi-level governance theory. The study contributes to the investigation of the dynamics surrounding EU formal decision-making processes revealing the broad range of informal political interactions that take place in the Brussels' lobbying arena. The thesis shed light on the reality at the hearth of the Union where European regional authorities are striving to consolidate their role within the supranational policy processes establishing a policy dialogue with the EU institutions. While regional authorities do not enjoy a recognised role within the formal European Union policy-making, they are nevertheless found to be engaged in strengthening their political influence by means of their representations in Brussels. The findings on Piemonte office effectively described the EU as a multi-level governing forum in which various actors from different institutional levels participate, albeit with different specific weight, in the decision-making processes (Huysseune and Jans 2007). In this regard the case study proved the existence of intense interactions between a specific subnational authority and the EU supranational level. While it is not possible to argue that these interactions would automatically translate into clear policy influence they stand as a proof of the existence of a multilevel dialogue within the EU on issues of regional interest.

The case study on the lobbying surrounding the future of Cohesion Policy post-2020, also entailed a significant societal relevance and political saliency. The discussions on the future budget of the Union, and particularly the reform of Regional policy, represented a prominent topic on the EU agenda over the months of this research and will remain at the centre of the debate in the months to come. The research has shown how many European Regions have tried to participate in this process defending their role as implementing bodies and putting forward proposals for reform of what is the main investment policy of the EU. The effective involvement during the upcoming negotiations on the future EU budget of a broad range of stakeholders (including regional authorities), represents a crucial societal issue which significance goes well beyond its theoretical implications having far reaching

political consequences in terms of European project's legitimacy. In this regard, this thesis has showed how Regions, as representative public authorities closer to the citizens, can provide the EU institutions essential feedbacks from the various local contexts by mobilizing at the supranational level. Regions can, therefore, act as transmission belts within the EU multilevel system, improving the quality and legitimacy of the decisions while ensuring the necessary citizens' engagement in the future of the Union.

Regarding the implications for Piemonte Region, the research proved that its permanent presence in Brussels by means of a liaison office is more than just a status symbol. It represents, in fact, a key instrument to enhance the Regions' lobbying capacity towards the EU decision-makers. In particular, the office significantly contributes to Piemonte' efforts to place regional interests on the European political agenda as it allows to improve the use of the available formal participation channels, while also enabling the Region to exploit the additional informal channels of influence that exists in Brussels. Ultimately, this study proves that the regional presence in the capital of the EU should be considered as a strategic instrument of supranational participation which benefits are to be expected and calculated in the longer term. For a regional government, these gains express themselves not only in terms of favourable legislation but also in better preparedness, simplified implementation of EU legislation and more easily adaptation to policy developments.

Besides the described strengths and added value of the Piemonte Brussels office, the study also revealed a number of limitations constraining the Region's capacity to engage in extensive lobbying at the EU level. These can be conceptualized as external and internal constraints. The external obstacles to regional lobbying are mostly linked to the EU institutional setting. In this respect, the research has highlighted a number of structural constraints, such as: the great complexity of the EU governance structure, the Member States' dominance within the formal EU decision-making mechanisms and the consequent lack of formal recognition of the role of European Regions (Interviews 1-3). Conversely, the critical points attributable to the Piemonte's internal organization are the unsatisfactory coordination of the Brussels office with the regional administrative structures and the volatile level of attention of the home-Region regarding specific policy themes (Interviews 2-3-4). The office's institutional lobbying activities are, in fact, heavily dependent on the political

support from the Regional government. Therefore, an insufficient level of attention on a certain issue may represent an obstacle in conducting effective lobbying on that theme in Brussels. Finally, another significant constraint in the office's lobbying capacity are its limits in the number of Brussels-based personnel (Interviews 1-2-3).

This analysis of the strengths and weakness of the Piemonte Brussels office will form the basis for the development of a number of recommendations. In the final section of this chapter I will, in fact, translate the research findings into strategic choices for the organization under study developing concrete recommendations for the operations of the Piemonte Brussels office .

5.3.1. Critical appraisal of the research process and directions for future research

Before concluding, it is appropriate to conduct a critical appraisal of the entire research process including the shortcomings encountered. The study's qualitative research, combining document analysis, interviews and participant observation, has led to a grounded and critical understanding of the lobbying carried out by the Piemonte regional office in Brussels. The strength of this research strategy rested in the privileged point of view on the lobbying activities ensured by the full access I have been granted while working as an intern at the Piemonte Brussels office. My direct involvement in the interest representation initiatives under study allowed me to follow the entire process of Piemonte's lobbying on the future of Cohesion Policy developing a solid practical understanding of the phenomena at stake. Moreover, the research has taken place over a very favourable and eventful time-frame, during which I have been able to follow the numerous lobbying initiatives surrounding the next Multiannual Financial Framework leading to the EC proposal of May 2018.

The research, however, also entailed a number of limitations, in particular regarding the generalizability of its empirical results due to the fact that the study focused on a single Region. While this intentional choice enabled me to achieve an in-depth understanding of Piemonte Region's lobbying practices in Brussels, it had the shortcoming of not allowing for a comparative analysis or a general description of a wider category of European Regions. Most of the empirical results of this thesis are, therefore, region-specific warranting further

research on this subject. To address this limitation, future studies should expand the sample covering more Regions possibly across multiple Member States. Moreover, for further researches, it would also be very interesting to conduct more quantitative analysis on this theme assessing the actual effectiveness of regional lobbying towards the EU institutions.

5.4. Strategic recommendations

In concluding this research, I intend to translate its theoretical and empirical results into strategic recommendations for the improvement of the lobbying conducted by Piemonte Brussels office. Notably this research has not investigated the quantitative effectiveness of the Piemonte Brussels office lobbying activities, nevertheless the thesis has revealed a number of areas of potential improvement for the office's lobbying. Therefore, these recommendations are intended to improve the office lobbying not in terms of absolute effectiveness calculated on the basis of positive policy outcomes but in terms of procedural effectiveness. The objective of the recommendations is, in fact, to suggest ways for the Piemonte Brussels office to better conduct interest representation activities maximising its access to the EU decision-makers.

These recommendations are developed on the basis of the office's current financial resources and personnel since they are intended to be viable and implementable in the short term. This choice is not meant to neglect the fact that a bigger investment in the regional presence in Brussels, both in financial and human resources terms, would also significantly enhance the office's lobbying capacity maximising the benefits of Piemonte's presence in the heart of the EU.

For this purpose, four practical strategic recommendations are put forward:

1) Persevere in coalition-building efforts to reach critical mass in addressing the EU decision-makers showing willingness to take a leading role within the lobbying initiatives.

The Piemonte Brussels office should further focus its efforts to build large transnational coalitions of regions or of other like-minded actors. Such alliances, as it has been demonstrated, have the potential to enhance the impact of its lobbying efforts. Within these partnerships, Piemonte should take a leading role, for example taking charge of the practical work of organizing the initiatives or drafting the common positions. Being initiator and not a follower in collective lobbying actions, would entail a greater effort in terms of time and resources, but would also enable the Region to better express its interest. The role of frontrunner would, in fact, guarantee Piemonte greater visibility in Brussels and more control on the final message delivered to the EU institutions.

The Piemonte Brussels office could also raise its profile showing proactivity in the thematic networks to which is a member, by being particularly engaged and participating in the production of public goods (information, coordination, etc.). Establish reputation, being recognized in Brussels as a leader across a number of policy themes could, indeed, facilitate Piemonte's lobbying endeavours.

2) The Piemonte policy officers engaged in interest representation activities in Brussels, should undertake specific professional training courses on public affairs and lobbying techniques.

The findings of the study highlighted that the high professionalism of the regional "lobbyist" is an essential requirement for strong interest representation in Brussels. This is especially evident considering the complexity of the EU decision-making system and the high competition in capturing the attention of the decision-makers.

The proposed trainings would complement the already very solid knowledge and understanding of the EU governance processes and the high professionalism currently embodied in the office personnel. It would capitalize on the value of the Piemonte officers'

good networks of contacts enabling a more systematic and strategic use of the information collected as well as of the formal and informal access points available to Regions at the EU level. In this regard, borrowing and replicating the strategies and techniques of the professional “lobby industry” could help to maximize the impact of the office’s interest representation activities, giving Piemonte a comparative advantage in the increasingly crowded public affairs arena in Brussels.

3) Streamline the link between the Piemonte Brussels office and the regional administration in Turin ensuring timely exchange and effective use of the intelligence collected in Brussels.

The recommendation is to reform the internal communication mechanism, from Brussels to the various regional directorates and vice-versa, with the objective of better connecting and coordinating the regional activities in Brussels with the needs and work of the different sectors of the home administration.

One way to realize this would be to organize periodic meetings (preferably face-to-face) between the Brussels-based officials and their home administration counterparts. These meetings should be aimed at improving the mutual understanding and, consequently, facilitate cooperation enhancing the quality and effectiveness of future interactions. It may also be appropriate to undertake a general review of the way information is currently exchanged between Brussels and Turin to improve the prioritization of the intelligence collected in Brussels. Notably, the rationale behind this recommendation lies in the fact that unsatisfactory communication between the office and the regional administration is identified by the Brussels policy officers as a critical point (Interviews 2-3-4).

The research findings showed that continuous, smooth and effective dialogue between the Brussels delegation and the regional government is essential to conduct timely and decisive lobbying initiatives. Besides, the proposed reform of the internal communication system by better involving the regional structures, would have the positive effect of ensuring the political support and a more stable engagement of the regional elected

representatives. As proven, this political support is a key resource for lobbying that could enhance Piemonte Region interest representation towards the EU institutions.

4) Design and implement a strategic external communication plan to improve the visibility of the Piemonte's presence and activities in Brussels, making full use of the potential of Internet and social media.

On the basis of an acknowledged weakness in this area, Piemonte Region is in the process of renovating its external communication strategy, including its social media presence. In this regard, the implementation of a communication plan for the Brussels office is currently under study. This will include the renovation of the office's web page and the activation of a Brussels office's Twitter account. So far, a clear strategic plan was missing and the external communication of the office's activities and lobbying initiatives has been rather weak (without a constant updating of the official web page and no use of social media). Therefore, the recommendation for the Brussels office is to invest more in its external communication toward the EU institutions, the Brussels-based stakeholders and the Piemonte's citizenry. Improving the office's web and social media presence, together with a more strategic approach to other traditional communication methods, would enable Piemonte to better showcase the activities undertaken in Brussels and, consequently, ensure the recognizability of the regional presence in the city. To build a stronger and more recognizable brand for Piemonte Region within the EU policy community, would consequently allow to enhance the impact and magnitude of its lobbying initiatives.

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6.1. Interviews references

Interview 1: (12-04-2018), Head of Institutional Relations and European Affairs for Piemonte Region, Brussels.

Interview 2: (24-04-2018), Policy officer responsible for competitiveness, innovation and Cohesion Policy, Brussels.

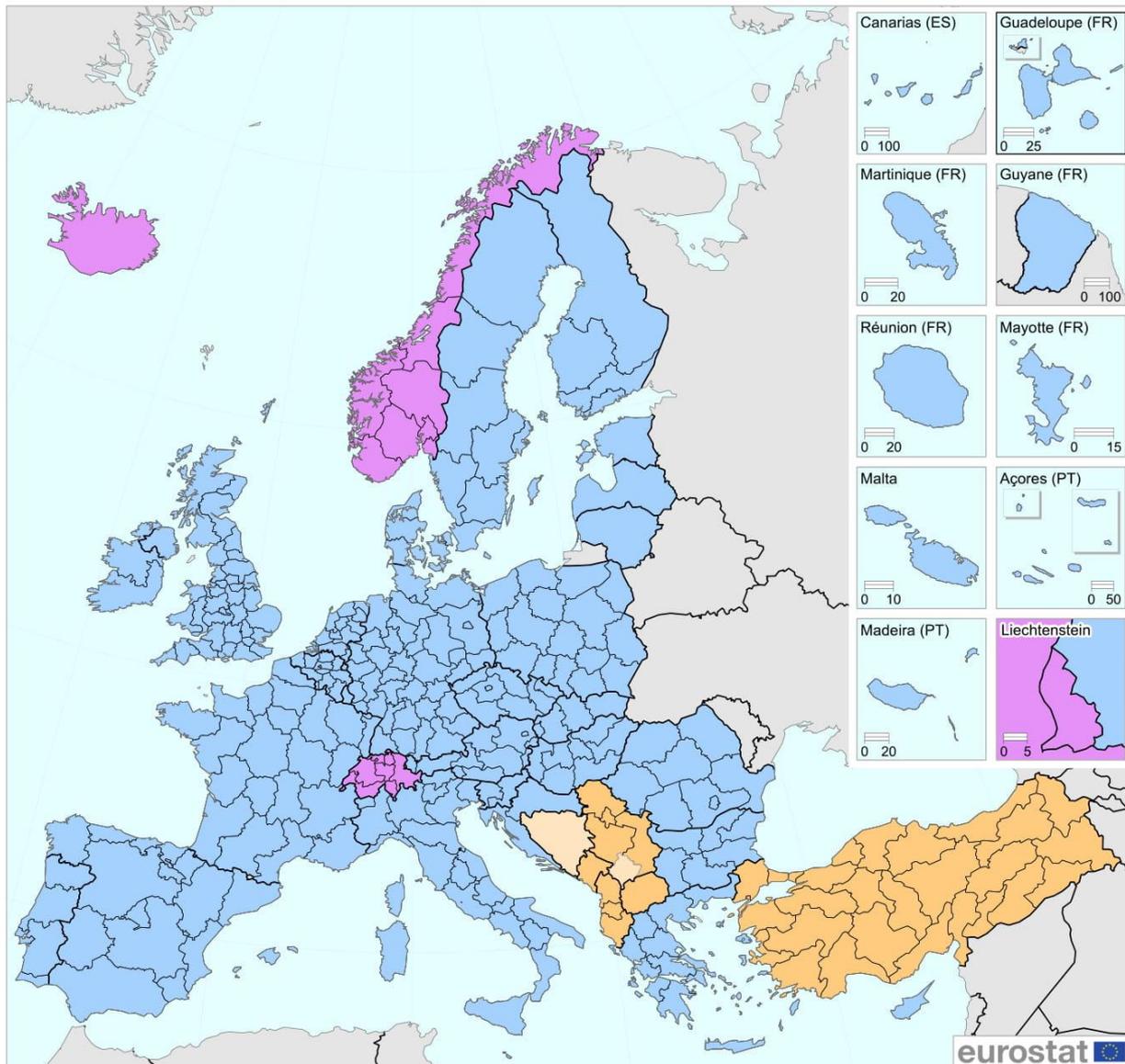
Interview 3: (5-04-2018), Policy officer responsible for territorial policies, transport, agriculture and environment, Brussels.

Interview 4: (10-04-2018), Policy officer responsible for social affairs, education, health and culture, Brussels.

7. Annexes

7.1. Annex 1: Maps NUTS 2 Regions EU-28

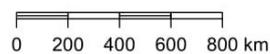
NUTS 2 regions in the European Union (EU-28), with corresponding statistical regions in EFTA countries, candidate countries and potential candidates



- Member States of the European Union (EU-28)
- EFTA countries
- Candidate countries
- Potential candidates

Administrative boundaries: © EuroGeographics © UN-FAO © INSTAT © Turkstat

Cartography: Eurostat - GISCO, 03/2018



Note: Regions in the Member States of the European Union (EU-28) according to NUTS 2013. Statistical regions in EFTA countries, candidate countries and potential candidates according to latest available bilateral agreement. The designation of Kosovo is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo Declaration of Independence.

7.2. Annex 2: Interview guide

Respondents from the Piemonte Region delegation to the EU in Brussels:

- 1) The Head of Piemonte Region's sector "*Institutional Relations and European Affairs*": Interview 1 held in Brussels on the 12-04-2018.
- 2) Policy officer responsible for competitiveness, innovation and Cohesion Policy: Interview 2 held in Brussels on the 24-04-2018.
- 3) Policy officer responsible for territorial policies, transport, agriculture and environment: Interview 3 held in Brussels on the 5-04-2018.
- 4) Policy officer responsible for social affairs, education, health and culture: Interview 4 held in Brussels on the 10-04-2018.

Model Interview guide: (open ended questions with the possibility to ask clarifications and examples to stimulate the response)

1° part (on the activities and functions of the Piemonte's Brussels office in general):

Explain the purpose of the interview and ask for permission to record the interview.

1. Can you describe your tasks over the course of a "typical" week of work in this office?
2. Can you please rank in order of priority the different functions and activities performed by this office? (from the most important to the least one)
3. What do you consider to be the added value for the Piemonte Region of a constant presence in Brussels through an office?
4. To what extent do you take into consideration the practices and strategies of other Brussels regional representations in your work?

2° part (focused on the office's lobbying strategies, especially regarding the future of Cohesion Policy post-2020):

5. How much of your work time is dedicated to activities that you would describe as lobbying activities?
6. What is the role and significance of the Piemonte Region's participation to thematical networks for the office's lobbying activities?
7. Can you describe the role and significance of the Committee of the Regions for the lobbying strategies of Piemonte Region?
8. What is your degree of involvement in the office's activities regarding the future of Cohesion Policy after 2020?
9. In which way does the Piemonte Region represents its interests on the future of Cohesion policy through its Brussels office? (What are the interest representation strategies and the channels employed?)
10. Can you describe the partners and the alliances of Piemonte Region with regard to the lobbying activities on the future of Cohesion Policy?
11. Who are targets of these lobbying activities? (institutional counterparts/contacts?)
12. What are in your opinion the strengths of the way Piemonte Region carries out lobbying activities through its office in Brussels?
13. What, on the other hand, are the main limitations and obstacles?
14. How in your opinion would it be possible to improve the effectiveness of the lobbying activities conducted by this office?

7.3. Annex 3: Document Analysis: List of papers and files consulted

(In addition to the official documents already referenced in the bibliography)

<u>Title</u>	<u>Author/ Source</u>	<u>Date</u>
Mailing list of Brussels-based stakeholders for the distribution of the ERAM position paper on the future of Cohesion Policy.	Piemonte Brussels office – internal document	May -June 2018
<i>Budget européen 2021-2027, l'ampleur des coupes masquée par la Commission</i>	News article: Contexte Pouvoirs, Jean-Sebastien Lefebvre (Brussels)	22 May 2018
European Commission planning major reform of categories of regions after 2020	Agence Europe	16 May 2018; Brussels
Report meeting URC: working group on Cohesion Policy	Piemonte Brussels office – internal report	14 May 2018
Report: organizational meeting between the officials of the AlpMed Regional Representation Offices on to the lobby initiative on the future of Cohesion Policy after 2020.	ERAM - internal report	9 May 2018; Brussels
Salient points Draft Common Provision Regulation 2021-2027	Piemonte Brussels office – internal report	May 2018
<i>La Commission veut rééquilibrer la politique régionale entre l'Est et l'Ouest et faire respecter l'État de droit</i>	News article: Contexte Pouvoirs, Martin Carceles	3 May 2018
<i>Investimenti e riforme, due nuovi fondi per l'Eurozona</i>	Newspaper article: Giuseppe Chiellino, "Il Sole24ore"	2 May 2018
Annex to the EC Communication A Modern Budget for a Union that Protects, Empowers and Defends.The Multiannual Financial Framework for 2021-2027	European Commission	2 May 2018; Brussels
Comparative table on the positions on the future of cohesion policy post 2020	Piemonte Brussels office – internal elaboration	March 2018
Report: Briefing of the Spanish regions position on Cohesion Policy beyond 2020	Piemonte Brussels Office – internal report	21 March 2018 –

		Committee of the Regions
The European Committee of the Regions and the Alps-Mediterranean Euroregion call for a strong and ambitious cohesion policy after 2020	Committee of the Regions – Press Release	21 March 2018
Position of the Alps-Mediterranean Euroregion on the future of cohesion policy	Alps-Mediterranean Euroregion (ERAM)	20 March 2018; Brussels
Press Release “ <i>Per una politica di coesione forte, ambiziosa ed efficace, anche dopo il 2020. Presentazione alla CE e al Comitato delle Regioni del documento di posizione dell’Euroregione Alpi-Mediterraneo sul futuro della politica di coesione</i> ”	Piemonte Region	20 March 2018; Brussels
Compte rendu de la réunion ERAM du 06 Mars 2018	ERAM - internal report	6 March 2018
A more ambitious Cohesion Policy for the post 2020 period	Toscana Region	8 March 2018
List of participants and agenda for the lobbying event of the 20th March ERAM	ERAM internal document	March 2018
Report : Incontro del Comitato con funzioni di sorveglianza e accompagnamento dell'attuazione dei Programmi operativi 2014-2020	Piemonte Brussels office – internal report (videoconference Rome Cinsedo)	20 February 2018
Compte rendu de la réunion ERAM du 16 février 2018	ERAM - internal report	16 February 2018
Cohesion Policy post 2020. Non paper from the Spanish Regions	Spanish Regions and Autonomous cities	February 2018
Report: EC Communication: “A new, modern Multiannual Financial Framework for a European Union that delivers efficiently on its priorities post-2020”	Piemonte Brussels Office – internal report	February 2018
DRAFT REPORT on strengthening economic, social and territorial cohesion in the EU: the 7th report of the EC”, 2017/2279(INI)	Committee on Regional Development, European Parliament	31 January 2018

<u>Manifesto for a Cohesion Policy at the hearth of Europe</u>	Emilia-Romagna, Hessen, Nouvelle Aquitaine, Wielkopolska Regions	25 January 2018
Piemonte Regions' official response to the Commission Public Consultation on EU funds in the area of Cohesion	Piemonte Region	10 January 2018 - 9 March 2018
Cohesion Alliance Declaration: <u>"#CohesionAlliance for a strong EU cohesion policy beyond 2020"</u>	Cohesion Alliance Initiative.	2018
Internal documents: list of policy officers yearly activities' plans, objectives, etc...	Piemonte Region Brussels office – internal documents	2017/2018
<u>Final conclusions and recommendations of the High Level Group on Simplification for post 2020</u>	The High Level Expert Group monitoring simplification for beneficiaries of ESI Funds (HLG)	11/July/2017
<u>Reflection paper on the future of EU finances</u>	European Commission	28 June 2017
<u>A strong cohesion policy for Europe and citizens EUROCIITIES policy paper on cohesion policy post-2020</u>	Eurocities	26 June 2017
<u>Position Paper of the Greens/EFA group on the future of Cohesion policy post-2020</u>	The Greens EFA	June 2017
<u>AER position on cohesion policy post 2020</u>	Assembly of European Region (AER)	1 June 2017
<u>The future of Cohesion Policy. A simplified and integrated territorial approach</u>	Council of European Municipalities and Regions (CEMR)	June 2017
<u>The future of Regional Cohesion Policy</u>	Conference of the Italian Regions and Provinces	20 April 2017 - Rome.
Embedding Macroregional Strategies in the Regulatory Framework post 2020	EUSALP - EU Strategy for the Alpine Region	6. April 2017 – Brussels
Preliminary document for the drafting of a communication plan for the representation office of Piemonte Region in Brussels	Piemonte Brussels office – internal document	2017

<u>« La programmazione 2014-2020 del POR-FESR Piemonte »</u>	Piemonte Region	2014 - Torino
Multiannual Financial Framework 2014-2020 and EU Budget 2014. The figures.	European Commission	2013
<i>Posizione sulla proposta di decisione del Parlamento Europeo sulla conclusione di un Accordo interistituzionale tra il Parlamento Europeo e la Commissione su un comune registro per la trasparenza</i>	Conference of the Italian Regions and Provinces	6 April 2011