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Lobbying across policy stages: different tales of interest group success?

Abstract. This paper examines interest groups' lobbying success across the agenda-setting and policy formulation stages of the European Union's policy process. On the basis of its exclusive right of initiative, the European Commission plays a pivotal role in both stages. I argue that interest groups relying mostly on pressure politics are more likely to achieve agenda-setting success because the Commission primarily seeks to assess the level of political support when setting its policy priorities. Conversely, organisations focusing predominantly on expertise-based lobbying are anticipated to be more likely to secure policy success as the Commission mainly requires expert knowledge when designing its policy proposals. An illustrative case study of the Commission's proposal on deforestation-free products demonstrates the plausibility of the theoretical argument. Overall, this research shows that distinct policy stages provide interest groups with unique opportunities for attaining lobbying success.

Keywords: Interest groups, Lobbying, European Commission, Policy process, Resources

Introduction

In October 2020, the European Commission announced that it would propose a legislative proposal that would curb EU-driven deforestation. A coalition of environmental organisations warmly welcomed the inclusion of their ‘dream’ issue on the Commission’s agenda. They were opposed by various industry organisations working with supply chains potentially associated with deforestation. Despite their intermittent lobbying victory, the coalition did not manage to secure their policy preferences in the Commission’s final legislative proposal. Consequently, they expressed serious reservations about the proposed regulation’s limited scope.

At first glance, this outcome is puzzling because it is widely believed that attaining agenda-setting success is crucial for realising one’s policy preferences in later stages of the policy process (Willems & Beyers, 2023). According to Schattschneider (1960), those interest groups that successfully shape the policy agenda are also likely to define the boundaries of the policy debate. By determining which issues attain agenda status, these organisations are well-positioned to shape the policy options considered by policymakers, giving them a higher likelihood of achieving policy outcomes that align with their preferences.

Against the backdrop of this intriguing case, the aim of this paper is to develop an argument to explain varying patterns of lobbying success patterns across the agenda-setting and policy formulation stages of the European Union’s (EU) policy process. These two stages are closely interlinked, as the European Commission holds the exclusive authority to initiate policies, making it a pivotal gatekeeper responsible for prioritising policy issues (agenda-setting) and selecting appropriate policy alternatives (policy formulation). In this regard, this paper argues that the Commission’s distinct legislative roles are associated with different reputational concerns, necessitating different types of resources. Firstly, I argue that the Commission primarily seeks to assess the scope of *political support* when setting its policy priorities because it helps to cultivate a new(er) reputation for being a *responsive* institution (Bunea & Nørbech, 2023; Haverland, de Ruiter, & Van de Walle, 2018). As a result, interest groups that focus on *pressure politics*, referring to the signalling the level of political support, are expected to more likely to achieve agenda-setting success. Secondly, I posit that the Commission mostly depends on expert knowledge when crafting its policy proposals to further consolidate its well-established reputation as a *responsible* actor (Bunea, 2019; Rimkutė & Haverland, 2015). It can subsequently be hypothesised that organisations that rely on *expertise-based lobbying*, which involves the provision of *expert knowledge*, are more likely to attain policy success.

To add flesh to the bones of the argument, I demonstrate its plausibility through an illustrative case study of the Commission’s legislative proposal for a regulation on deforestation-free products. Combining evidence from various data sources, the empirical analysis shows that the reliance on pressure politics was a vital element in the efforts of environmental groups to push their ‘dream’ issue onto the Commission’s policy agenda. Conversely, industry representatives managed to restrict the scope of the Commission’s final legislative proposal and fend off some of the harsher provisions by putting the focus on expertise-based lobbying.

This paper makes several contributions to the extant literature. Conceptually, it speaks to the neopluralist stream of interest group research by delving into the ‘contingency’ of the ‘influence enterprise’ (Lowery & Gray, 2004, p. 165). Neopluralist research emphasises the moderating role of the issue context and analyses ‘when, why, and to what extent interest groups are powerful’ (Baumgartner & Leech, 1998, p. 134). Despite considerable advancements in examining the contextual nature of lobbying success in recent years (see e.g. Rasmussen, Mäder, & Reher, 2018; or Stevens & De Bruycker, 2020), much of the extant literature tends to black-box the policy process and focuses solely on one specific policy stage (but see Willems & Beyers, 2023 for a recent exception). In contrast, this study adopts a neopluralist approach to address this limitation and highlights the importance of considering the unique dynamics at play in individual policy stages. Theoretically, the paper develops

an argument illustrating how the reputational concerns of a powerful supranational institution are linked to distinct resource needs and a varying receptivity towards different types of interest group inputs (Bunea, 2019). By responding to groups employing pressure politics during the agenda-setting stage while being more receptive to organisations prioritising expertise-based lobbying in the policy formulation stage, the Commission seeks to simultaneously consolidate its well-established reputation while cultivating a new(er) one (Bunea & Nørbech, 2023). Empirically, this research reasserts the value of illustrative case studies, which have been widely employed in past lobbying research (Voltolini & Eising, 2017). Despite a rise in large-N research projects, this paper aims to demonstrate that the exploratory single case study method can help to shed light on the plausibility of new theoretical arguments.

Two types of interest group success

In order to assess which interest group tactics are successful in which policy stages, it is necessary to first conceptualise the idea of lobbying success. Success does not necessarily imply ‘influence’. Political influence refers to the control over outcomes, thus assuming a causal relationship between interest groups’ lobbying efforts and political decisions (Dür, Marshall, & Bernhagen, 2019). Meanwhile, ‘successful’ interest advocates fulfil their political interests (Rasmussen et al., 2018). This conceptualisation thus focuses on the empirically observable implications of influence and recognises that convergence is not necessarily a direct result of specific actions exerted by the interest group.

One important consideration in this regard is that interest groups seek to advance their political interests across the distinct stages of the policy process (Willems & Beyers, 2023). The idea to model the policy process in terms of stages was first put forward by Lasswell (1956). In his attempt to provide a basic framework for the field of policy studies, he divided the policy process into a series of stages that each produce an outcome, either a policy agenda, a policy proposal or an adopted piece of legislation. These outcomes subsequently earmark the beginning of the next stage. Although in practice, different policy stages often overlap, the stages model provides a valuable analytical tool to deconstruct a complex process into more manageable components (Godwin, Ainsworth, & Godwin, 2012). Furthermore, it enables interest group scholars to examine to what extent distinct stages offer advocates unique opportunities to realise their political interests. As a result, viewing interest group success as a multi-faceted concept becomes beneficial, requiring specification in accordance with the particular policy stage under consideration (Binderkrantz & Pedersen, 2019). For the purpose of this research, I differentiate between *agenda-setting success* and *policy success*.

Starting with the former, agenda-setting scholars have made it evident that in any political system, there are an infinite number of issues begging to receive political attention (Jones & Baumgartner, 2005). Meanwhile, governments are constrained in their ability to respond to issues. This mismatch between an endless array of policy issues and constrained political elites drives the agenda-setting process: some issues attain agenda status at the expense of other issues (Princen, 2011). Agenda-setting thus refers to the process through which a particular issue captures the attention of policymakers and their subsequent decision regarding whether to engage with and tackle the said issue or disregard it (Godwin et al., 2012). The issues that do not make it onto the agenda remain latent for the time being (Bachrach & Baratz, 1962). For these issues, the status quo prevails – either the absence of policy action or the maintenance of the current policy framework.

The political conflict surrounding agenda-setting centres on differing perspectives regarding the agenda status of policy issues, specifically whether they should be included on the formal policy agenda or disregarded (McKay, Chalmers, Leech, Bernhagen, & Berkhout, 2018). Some groups aim to achieve an initial success by drawing attention to their ‘dream’ issue and pushing it onto the policy agenda, while others strive to prevent their ‘nightmare’ issue from gaining political attention and becoming subject to legislative action (Bachrach & Baratz, 1962). Notably, these positions are issue-specific: a single organisation may be a SQ challenger on one issue but a SQ defender on another

(Baumgartner, Berry, Hojnacki, Leech, & Kimball, 2009). Agenda-setting success can thus be conceived of as the extent to which an interest group manages to advance its favoured issues on the agenda while effectively preventing those it opposes.

Once an issue attains agenda status, the policy formulation stage kicks off. Policy formulation refers to the development of policy proposals to resolve the issues that have reached the agenda (Godwin et al., 2012). As there are multiple ways that policymakers might address an issue and actors often disagree about possible policy alternatives, they need to determine the specific content or scope of a policy proposal. Doing so requires brainstorming, discussing, and debating the costs and benefits of various policy options (Klüver, 2013). The aim of this policy formulation process is to narrow down the array of alternatives and ultimately select the most appropriate one (Kingdon, 1995). The outcome of is then a policy proposal, which will serve as the foundation for further deliberations during the decision-making stage.

Political conflicts over policy formulation revolve around the question of which policy option to select. Interest advocates indeed have diverging preferences over the scope of policy action (Dür et al., 2019). Whereas SQ challengers seek to push for strong levels of political interference, SQ defenders groups prefer to scale down the scope of an upcoming policy proposal (Baumgartner et al., 2009). As a result, gaining *policy success* is conceived of as the extent to which an interest group attains policy options it prefers while averting those it dislikes.

The European Commission's resource demands across policy stages

To explain differential patterns of agenda-setting and policy success, I draw on resource dependency theory (RDT), as developed by Pfeffer and Salancik (1978). According to RDT, organisations are not internally self-sufficient but rely on their environment to sustain themselves. Applied to the sphere of politics, RDT suggests that policymakers depend on external organisations to obtain valuable policy goods such as political support and expert knowledge (Bouwen, 2002). While RDT is often used to explain variation in levels of access, several scholars also rely on the framework to address the question of lobbying success (Flöthe, 2019; Klüver, 2013). These researchers suggest that those interest groups that can leverage institutional resource needs are, in theory, more likely to fulfil their political interests.

In light of this, I argue that the European Commission depends on different types of resources depending on whether it acts as an agenda-setter or a policy formulator. I support this argument theoretically by relying on insights from the bureaucratic reputation literature (Busuioc & Rimkutė, 2020). According to this line of research, the Commission, like any other bureaucracy, is driven by two fundamental logics of organisational behavior: enhancing its institutional power (Kreppel & Oztas, 2017) and safeguarding and improving its autonomy (Ellinas & Suleiman, 2012). To achieve these objectives, the Commission must effectively build input and output legitimacy (Bunea & Nørbech, 2023). While building a reputation for being a *responsive* institution is key for achieving input legitimacy, the cultivation of a reputation as a *responsible* actor is essential to build output legitimacy (Bunea, 2019). Both forms of reputation are then perceptions of the unique capacities of the Commission, embedded in a network of multiple audiences that that can either sustain or erode its legitimacy (Busuioc & Rimkutė, 2020).

In the agenda-setting stage, I anticipate that the Commission seeks to maximise input legitimacy and therefore primarily seeks to cultivate a reputation for being a *responsive* institution. In this mode of reputation-building, it seeks to show that its decisions were informed by and reflect the demands of the different (sub)constituencies (Bunea & Nørbech, 2023; Meijers, Schneider, & Zhelyazkova, 2019). The Commission's quest for agenda-responsiveness is driven by the increased politicisation of EU politics and public policy, which has put significant pressure on the Commission (Bressanelli, Koop, & Reh, 2020). In such a contentious environment, it needs to be seen to 'listen' to a wider range of audiences (Giurcanu & Kostadinova, 2022; Haverland et al., 2018). While unable to

adopt EU public policy directly, its agenda-setting power is a strategic tool to 'react' (Koop, Reh, & Bressanelli, 2022). By carefully prioritising broadly supported issues while avoiding heavily opposed ones, the Commission tackles the challenge of cultivating a new(er) reputation as a supranational institution that is attentive to and interested in public opinion and stakeholders' public demands (Bunea & Nørbech, 2023). However, to establish and maintain its reputation for being a responsive actor, the Commission requires assessments on the scope of *political support* for the multiple issues calling for its attention (Bunea, 2019). This key resource includes information about public preferences, moral concerns, or support among specific constituencies, such as stakeholders, members, or a slightly broader constituency (De Bruycker, 2016; Flöthe, 2019).

Conversely, I argue that once the Commission starts crafting its policy proposals, the focus shifts towards output legitimacy considerations, leading it to foster its more established reputation as a *responsible* actor (Bunea, 2019; Majone, 2002). This mode of governance is associated with depoliticised and evidence-based decision-making in which expert knowledge carries the day. Even though the Commission is expected to embrace the new opportunities and challenges of a responsive mode governance in its agenda-setting activities, it cannot simply abandon the principles and practices of expert-informed decision-making as it would pose a significant threat to its consolidated reputation as a responsible policy designer (Bunea & Nørbech, 2023). Through its formal role as a policy designer, the Commission can show that it selects policy options based on rational deliberation and underpinned by scientific know-how (Rimkutė & Haverland, 2015). To do so, it requires specific information on the technical, legal and economic implications of various policy alternatives (De Bruycker, 2016). Such *expert knowledge* helps the Commission to make informed policy choices and assess the probable negative externalities or hazards of proposed measures (Flöthe, 2019).

Deriving hypotheses: two logics of interest group success

In the section above, I elucidated the relationship between the different legislative responsibilities of the Commission and the associated considerations about its reputation, which in turn shape its resource requirements. Following RDT, interest groups' ability to achieve lobbying success in a given policy stage is a function of their ability to leverage the specific institutional resource demands in that stage (Klüver, 2013). In line with De Bruycker (2016), two modes of lobbying can be distinguished in this respect. Firstly, interest representatives may employ *pressure politics* by signalling the level of political support for their demands (Flöthe, 2019). For instance, consider a citizen group advocating for stricter reductions in pesticide usage; they could showcase widespread support for their cause by presenting data from surveys or petitions that reflect public opinion. Second, organisations may opt for *expertise-based lobbying*, entailing the provision of information to policymakers encompassing the technical, economic, and legal facets of a given issue. As an example, a farmers' association might offer insights into the economic ramifications of further curtailing pesticide usage for their members companies. While groups often rely on both modes of lobbying, it is important to note that the strategic emphasis may vary: some advocates primarily engage in pressure politics, others prioritise expertise-based lobbying (Flöthe, 2019).

On this basis, two distinct logics of interest group success can be distinguished for the agenda-setting and policy formulation stages (see Table 1). First, engaging in pressure politics is most fruitful when groups seek to secure agenda-setting success. Interest groups can collect this policy good through their interactions with members and supporters or general citizens (Flöthe, 2019). Once obtained, they can use it to persuade the Commission to act in line with their own objectives, so that the political decision to (or not to) prioritise an issue corresponds with the prevailing political views among the group's members and supporters (De Bruycker, 2016). In turn, the Commission is incentivised to listen and respond to advocates who signal the scope of political support in the agenda-setting stage as these groups help to reduce uncertainty about the political urgency of specific issues

(Haverland et al., 2018). Ignoring signals of widespread support could lead to a loss of reputation and raise concern about a lack of input legitimacy (Bunea, 2019). Hence, the Commission strives to align its policy priorities with organisations that transmit signals of political support, bolstering its reputation for being a responsive institution and strengthening its claim for input legitimacy (Bunea & Nørbech, 2023).

Hypothesis 1: Interest groups engaging in pressure politics are more likely to attain agenda-setting success than organisations relying on expertise-based lobbying.

Second, focusing on *expertise-based lobbying* is most effective during the policy formulation stage. Interest groups can generate this policy good by setting-up research units or investing in in-house expertise and research to gain information on the specificities of the issue in question (Stevens & De Bruycker, 2020). Through conducting thorough analyses of the issue at stake, organisations develop a deep understanding of the technical, legal, and economic complexities involved. By leveraging this specialised knowledge, and present well-substantiated policy alternatives, they can make a persuasive case to the Commission for the adoption of their preferred policy approach (Klüver, 2013). In the policy formulation stage, the Commission particularly recognises the value of expert knowledge as it enables it to craft informed, effective, and efficient policy proposals (Rimkutė & Haverland, 2015). The inclusion of external expertise is vital in order to identify the most suitable policy alternatives, taking into account intricacies that internal capabilities might not fully grasp (De Bruycker, 2016). By embracing expertise-based lobbying, the Commission seeks to enhance the quality of its proposed policies and hence its reputation as a responsible actor committed to efficient and effective policymaking (Bunea, 2019). In other words, it allows the Commission to credibly claim output legitimacy.

Hypothesis 2: Interest groups relying on expertise-based lobbying are more likely to attain policy success than organisations engaging in pressure politics.

Table 1: Overview of the theoretical argument

<i>Policy stage</i>	Reputational concern	Critical resource	Logic of success
<i>1. Agenda-setting</i>	Responsive governance (input legitimacy)	Political support	Pressure politics
<i>2. Policy formulation</i>	Responsible governance (output legitimacy)	Expert knowledge	Expertise-based lobbying

Method

Plausibility probe

So far, I have developed a plausible theoretical argument for two distinct logics of interest group success across the agenda-setting and policy formulation stages. Still, the question remains whether it is possible to present a plausibility probe, looking at evidence that seems in line with the expectations (Eckstein, 1975). The probe is an empirical device which explores the suitability of a particular case as a vehicle for exploring the validity of a theoretical claim. Notably, the aim is here not to empirically 'test' the hypotheses nor to fully explain the outcome of a case. Instead, the probe intends to show that the proposed argument warrants further attention by providing an exploratory analysis that allows for alternative explanations. As Levy (2008, p. 6) notes 'the aim is to give the reader a "feel" for a theoretical argument by providing a concrete example of its application'. Plausibility probes play a crucial role in the process of theory development, particularly when used as preliminary studies on relatively untested theories such as the one presented in this paper. Practically, they help researchers to avoid setting-up time-consuming empirical tests by providing an intermediary stage in which theoretical claims are illustrated (George & Bennett, 2005).

Case selection

In this paper, I focus on the European Commission's proposal for a regulation on deforestation-free products. This case was chosen as a *typical* example of EU regulatory policy processes because it involves a wide range of stakeholders, including environmental NGOs and industry representatives, which mirrors the usual dynamics of EU regulatory processes, where diverse interests are considered. Moreover, it is subject to the ordinary legislative procedure, which covers the vast majority of EU policy areas. Lastly, environmental policy is a core EU policy area characterised by important current developments in which the Union has clear competences.

To identify interest organisations active on the issue of deforestation, I manually collected relevant media coverage between January 2019 and January 2022 from three news EU-level outlets: Politico, EUObserver, and Euractiv. I based my search for articles in the media archives on carefully selected keywords. Articles that only vaguely or indirectly related to the issue of deforestation were omitted. Keyword searches were finalised only when an information saturation point was met, namely, when the addition of new keyword searches did not result in additional articles. To complement the list of organisations derived from the media statements, I also included advocates providing feedback to the Commission's inception impact assessment. On this basis, I comprised an initial list of actors that were actively involved in the issue.

To narrow down the list of interest groups, I used a 'most similar case selection design' by considering organisations with comparable staff sizes, often considered to be the most important facilitator of lobbying success (Stevens & De Bruycker, 2020). These organisations are evenly split between pro and contra groups. On the one hand, I focus on the efforts of five environmental NGOs challenging the extant policy framework and urging the European institutions to step up EU action against deforestation. On the other hand, I analyse the efforts of five business groups representing industries working with supply chains potentially associated with deforestation and expressing strong reservations regarding legislative action on the issue.

Notably, one could argue that the type of interest represented or the organisation's position can be used as proxies a group's preferred mode of lobbying. For instance, it could be hypothesised that citizen groups and/or SQ challengers are more likely to use pressure politics while business interest and/or defenders of the SQ are more likely to rely on expertise-based lobbying. Nonetheless, an extensive body of empirical research has failed to discover consistent trends that would

substantiate this assertion (De Bruycker, 2016; Flöthe, 2019; Nownes & Newmark, 2016). These studies show no systematic differences between different types of groups in terms of their lobbying modes, and the findings regarding the relationship between organisational positions and lobbying modes have been predominantly conflicting.

Operationalisation

Measuring interest group success encompasses various approaches. While some studies rely on *reputational* assessments, which involve asking policy experts to identify organisations that effectively shaped the policy process (Stevens & De Bruycker, 2020), this paper adopts a *preference attainment* approach (Dür et al., 2019; Klüver, 2013). The preference attainment method utilises information regarding group preferences and the outcomes of policy stages. One key advantage of this approach is that it avoids potential biases inherent in reputational approaches, where respondents' perceptions may lead to over- or underestimation of influence levels (Dür, 2008). However, it is important to note that the preference attainment approach does not directly examine influence. Therefore, in this study, I deliberately opt to focus on lobbying success, where outcomes of policy stages are not necessarily attributed solely to specific actions undertaken by a particular lobbying actor (Rasmussen et al., 2018).

In order to assess the congruence between the preferences of interest groups and the outcomes of the agenda-setting and policy formulation stages, I utilised various information sources. First, I gathered relevant position papers, briefings, and press releases from the websites of the selected interest groups, following a similar document collection strategy as with the media articles. Furthermore, I considered media quotes or paraphrases that could be connected to one of the organisations under investigation. Information obtained from both of these data sources was carefully examined by categorising it according to the stance on policy change (agenda-setting) and the preferred policy options (policy formulation). To ensure the reliability of the document analysis, I also conducted six online structured interviews with interest representatives from both sides (three with SQ challengers and three with SQ defenders) between February 2022 and May 2022. All respondents are public affairs specialists who worked on the issue in question and were identified based on statements in the coded news stories, via the organisation's website, or through desk research. The interviews were carefully designed to elicit specific information about organisational preferences as well as their lobbying strategies. Official EU documents and statements by public officials in the media were subsequently used to assess the whether political decisions on the issue of deforestation corresponded to the preferences of interest groups.

To assess interest groups' dominant mode of lobbying, I utilised information from the strategic lobbying documents mentioned above and as well as their specific statements in the media. Building on previous research (De Bruycker, 2016; Flöthe, 2019), I classified their claims into two categories: those associated with pressure politics (such as information on public opinion, social impact, and support from specific subgroups) and those related to expertise-based lobbying (including technical or scientific data, legal information, and details regarding the economic impact). In the analyses, I further enhance the insights derived from the observational data sources by integrating findings from the interviews. Table 2 provides a concise overview of the main results related to the predominant lobbying modes employed by interest groups and their success in achieving their desired outcomes.

Results

Agenda-setting: from status quo to legislative agenda

Since the turn of the century, about 200 million hectares of forests – almost a tenth of the total forest

area – have been lost (FAO, 2020). As a consequence, deforestation is the second-largest source of greenhouse gas emissions (after fossil fuels) and the primary driver of biodiversity loss (Bager, Persson, & dos Reis, 2021). The primary cause of deforestation is the expansion of agriculture for the cultivation of certain forest-risk commodities (FRCs). These FRCs are in high demand in the EU because of the limited production and the presence of large food and feed industries (Pendrill, Persson, Godar, & Kastner, 2019). The EU is subsequently among the major importers of FRCs and hence responsible for approximately 10% of global forest destruction¹.

Nonetheless, before the Commission published its proposal on deforestation-free products in November 2021, no EU rules directly covered the issue of EU-driven deforestation. The issue only was addressed by a set of voluntary measures such as certification schemes or corporate sourcing initiatives². In terms of regulatory measures, deforestation had also been partially covered through the EU Timber Regulation, which prohibits the placing of illegally harvested timber on the EU market and obliges economic operators who put timber products for the first time on the EU market to exercise due diligence. Similarly, the Renewable Energy Directive indirectly addresses issue by targeting the deforestation risk associated with EU bioenergy demand. Nonetheless, this extant policy framework – which is conceived of as the SQ of the issue in this study – does not account for deforestation caused by agricultural expansion.

The impetus for legislative action on the issue of deforestation emanated from a coalition of several environmental organisations. From the beginning of 2019 onwards, these groups joint forces and increasingly started to put pressure on the Commission to propose legislative measures that ensure that supply chains linked to the EU are free from deforestation. During the interviews with representatives of these groups, it became evident that the arguments used in their agenda-setting efforts rarely involved technical, economic or legal aspects of the issue. Instead, their main emphasis was on demonstrating public support for their cause. An examination of their strategic lobbying documents further elucidates this reliance pressure politics. Many of their publications prominently featured a YouGov poll, indicating that 87% of EU citizens supported the necessity of legislative action to protect global forests³. Moreover, they underscored the public's concern over deforestation, highlighting that 91% of EU citizens cared deeply about the issue. As well-exemplified by a statement of the coalition's spokesperson in May 2019:

'Europeans have made it very clear: they understand the terrible consequences of deforestation and do not want to be complicit in this tragedy. They do not want to buy products that are tainted by forest destruction. They want new laws ensuring that the simple act of shopping no longer means walking an ethical tightrope'.⁴

The coalition's strategic emphasis on pressure-based arguments resonated effectively with other important choices in their lobbying strategy. First, both the interviews and the document analysis underscore the coalition's preference for utilizing 'outsider' communication channels as their primary avenue for conveying succinct and clear messages regarding their public support (De Bruycker, 2016). Although interviewees acknowledged sporadic informal interactions with Commission officials, their primary approach was centred around tactics such as disseminating press releases, conducting joint briefings, and issuing public statements to effectively raise awareness about the issue. Second, the collaboration between these organisations ensured that their pressure signals carried more political weight, reinforcing their demands (De Bruycker & Beyers, 2019). Thirdly, the interviews shed light on how the coalition actively engaged in horizontal venue shopping to gain political attention for the issue (Princen, 2011). They sought arouse interest from other EU-level institutions by reaching out to MEPs from like-minded political groups, including the Greens and the Socialists & Democrats group, as well as representatives from supportive Member States. Furthermore, they leveraged the support from the co-legislators in their communication towards the Commission⁵, referencing calls by the European

Parliament for regulatory action⁶ and highlighting that a coalition of Member States, such as Belgium, Denmark, France, Germany, Italy, and the Netherlands, had urged the Commission to propose legislative measures⁷. In general, these tactics share the common objective of exerting pressure on the Commission and capturing its attention towards the issue (Dür & Mateo, 2014; Princen, 2011).

In the aftermath of the kick-off of the campaign, the Commission started to gradually pay more attention to the issue of deforestation. A first significant development occurred in September 2019 when Frans Timmermans, the Commissioner-designate for the European Green Deal (EGD), expressed his commitment to respond to calls for EU legislation, placing particular emphasis on the level of political support for EU action:

*'People now understand that it is time to do something [...]. Every consumer in the EU should have the right to know when they buy something whether that product was created with deforestation: Yes or no.'*⁸

Two months later, his declaration was followed up by the inclusion of the issue of deforestation in the Communication of the EGD, the 2019-2024 Commission's encompassing climate agenda introducing an overarching sustainability lens across multiple policy domains⁹. The Commission's commitment to address EU-driven forestation was further reinforced in its EU Biodiversity Strategy¹⁰ and Farm to Fork Strategy¹¹, published in May 2020. However, it was only in October 2020 that the issue of deforestation formally attain agenda status when it was included in the Commission's Annual Work Programme for 2021¹². These official documents translate the multiannual political goals into concrete legislative agendas for the 12 months ahead and are therefore often used to measure the Commission's policy priorities (Haverland et al., 2018; Koop et al., 2022).

Virginijus Sinkevičius, the Commissioner for Environment, Oceans, and Fisheries, provided further justification for the inclusion of the issue of deforestation. He highlighted that the decision to address the issue was a direct response to the growing level of 'unprecedented awareness and concern' surrounding global forest destruction¹³. This statement suggests that the campaign undertaken by the coalition had a substantial impact in increasing public awareness of the issue and that, as a result, the Commission became more attuned to signals indicating political support for EU action. So, through their pressure-based advocacy, they succeeded in capturing the attention of the Commission, compel it to take action and incorporate the issue into its legislative agenda.

One important consideration in explaining the success of the coalition's agenda-setting efforts is the strategic timing of their lobbying activities (Crepaz, Hanegraaff, & Junk, 2023). The campaign was launched deliberately two days before the European Parliament elections and a few months prior to the new Commission taking office. These institutional changes created a favourable momentum for achieving agenda-setting success. The Greens experienced an increase in their parliamentary seats, and the EGD had been a prominent theme in the campaign of Commission President-elect Ursula von der Leyen.

The well-timed initiation of the campaign stands in contrast to the mobilisation of industry groups, which got off to a slow start. While the idea of legislative action on deforestation only gradually caught fire at the incoming Commission, industry groups indicated that they only became active a few months before the issue formally attained agenda status. During this brief period, they sought to prevent costly regulation from being included on the legislative agenda by primarily relying on legal arguments. In particular, their strategy involved raising concerns over legal overlaps with existing EU legislation as well as WTO rules thereby aiming to create doubt about the EU's authority to address the deforestation issue (Princen, 2011). However, upon realising the unlikelihood of blocking legislative action, they swiftly redirected their focus towards scaling down the scope of the forthcoming proposal, as evidenced in the subsequent section.

One important consideration is that the delayed agenda-setting activities of business actors in this specific case may initially appear *atypical* since they are commonly expected to play a dominant role in agenda-setting (cf Dür et al., 2019). However, it is crucial to recognise the findings of Baumgartner et al. (2009) which extensively document distinct lobbying behaviours exhibited by status quo defenders and challengers. Specifically, they show that SQ defenders tend to adopt a reactive rather than proactive approach to issues. Given that business groups often act as defenders of the SQ on various matters, it is plausible that they often tend to refrain from initiating active and costly mobilisation efforts unless there is a clear call for significant policy changes.

Policy formulation: from legislative agenda to policy proposal

In September 2020, the policy formulation stage formally kicked off when the Commission launched an open public consultation aimed at gathering stakeholders' opinions regarding various policy options for a policy proposal on halting deforestation. To overcome their setback in the agenda-setting stage, SQ defending groups used this opportunity to attempt to downplay the upcoming Commission policy proposal. In this stage, certain industry representatives, as indicated in interviews, occasionally brought up arguments related to the lack of support among their member companies for costly policy alternatives. However, of greater significance, they extensively utilised arguments grounded in expertise. Similar to their engagement in the agenda-setting stage, various organisations consistently resorted to legal arguments, cautioning against potential legal overlaps¹⁴. In addition, they also underscored the possible emergence of new trade barriers that could result in supply shortages within the EU¹⁵. Lastly, they sought to narrow down proposal's scope by advising against imposing disproportionate administrative and logistical burdens on operators¹⁶.

Their predominant focus on expertise-based lobbying was consistent with other important lobbying tactics. First, and in contrast to their opponents, they avoided outsider communication channels as they entail risks and may have worked counterproductively (De Bruycker & Beyers, 2019). Instead, the interviews as well as the document analysis reveal that they chose to primarily convey their expert knowledge through both formal (e.g. by circulating position papers) and informal (e.g. via personal contacts with Commission officials) 'insider' channels which allow for more precise detail and scientific scrutiny (De Bruycker, 2016). Second, most SQ defenders chose to lobby alone, which is not surprising given that coalescing with other groups does not necessarily facilitate the provision of expert knowledge. Lastly, the interviews shed light on how they also reached out to MEPs from conservative political groups, the European People's Party most notably, as well as Member States with vested forestry industries, such as Finland or Sweden. Overall, this combination of strategic decisions fitted well with their overall objective: de-politicising the policy debate and privatising the scope of conflict (Princen, 2011; Schattschneider, 1960).

In contrast, the SQ challenging coalition sought follow-up on their agenda-setting victory by calling upon the Commission to propose a legislation with an ambitious scope. In particular they asked to not exclude other endangered ecosystems from the regulation¹⁷ and advocated for the inclusion of all products that raise environmental concerns¹⁸. Differing from their actions during the agenda-setting stage, some interviewees indicated that they sought to substantiate their demands with arguments grounded in scientific research. Indeed, several position papers contain scientific data on the conversion of other ecosystems as well as evidence on the direct consequences of different commodities on deforestation¹⁹. At the same time, however, interviewees stressed that their foremost priority was to fortify their pressure-oriented strategy, as well-exemplified by the organisation of the #Together4Forests campaign²⁰. This campaign secured backing from more than 200 additional NGOs and encouraged over one million EU citizens to actively engage in the public consultation process, whereby they were able to showcase the breadth of political support²¹.

Notwithstanding a positive feedback effect, in which increased lobbying activity made the issue more salient which in turn stimulated additional groups to join the campaign, their initial agenda-setting success was not followed up by a victory in the policy formulation stage. When the Commission presented its final legislative proposal for a regulation on deforestation-free products on 17 November 2021, SQ challengers reacted rather disappointed²². On the one hand, the proposal – which would impose mandatory due diligence requirements on operators – only covered the protection of forests while other endangered natural ecosystems (including savannahs, grasslands, wetlands, peatlands and mangroves) were excluded from its scope. On the other hand, the proposed regulation targeted only a limited set of commodities: soy, beef, palm oil, wood, cocoa and coffee. So, contrary to their demands, the Commission decided to omit other FRCs such as poultry, maize, rubber, palm oil-based derivatives, charcoal and printed paper products.

The reliance on expertise-based lobbying by defenders of the SQ was thus followed by a successful scaling down of the policy proposal. Notably, their expertise-based arguments were also picked up by the Commission in their justification of selected policy options²³. The latter considered an expansion of the scope ‘premature’ given ‘the lack of practical experience’ which would in turn be ‘detrimental to the effectiveness and enforceability of the policy measures’²⁴. When asked about the decision to exclude other ecosystems and other additional FRCs, Sinkevičius also followed this output-oriented legitimisation mode referring to a ‘very careful impact assessment’²⁵.

Table 2: Overview of the main findings

<i>Position</i>	<i>Agenda setting</i>		<i>Policy formulation</i>	
	<i>Dominant mode of lobbying</i>	<i>Success</i>	<i>Dominant mode of lobbying</i>	<i>Success</i>
SQ Challengers	Pressure politics	Preferences attained	Pressure politics	Preferences not attained
SQ Defenders	Expertise-based lobbying	Preferences not attained	Expertise-based lobbying	Preferences attained

Discussion and conclusion

This paper was set out to explain varying patters of interest group success across the agenda-setting and policy formulation stages of the EUs policy process. I argued that the Commission’s distinct legislative roles are associated with different reputational concerns constituting varying resource demands. This, in turn, was expected to result into two distinct logics of interest group success: whereas organisations engaging in pressure politics were expected to be more likely to secure agenda-setting success, organisations engaging in expertise-based lobbying were anticipated to more likely to attain their policy preferences in the Commission’s policy proposals. To illustrate the plausibility of this argument, I performed an illustrative case study of the Commission’s legislative proposal on deforestation-free products. The results highlighted that patterns of interest group success vary considerably across distinct policy stages. Whereas agenda-setting success was attained by organisations primarily relying on pressure politics, policy success was gained by groups that focused on expertise-based lobbying.

The findings of this research confirm the results of earlier work suggesting that the role of interest group’s resource supply in gaining advocacy success must be carefully assessed in conjunction with other strategic lobbying choices (De Bruycker & Beyers, 2019). So, in line with the objective of a plausibility probe, the illustrative case study helped to illuminate the theory and strengthen its

prospects. At the same time, the research findings challenge the conventional belief that agenda-setting success is inherently more important than securing successes in the legislative stages (Schattschneider, 1960; Willems & Beyers, 2023). Despite the environmental groups' initial success in pushing their 'dream' issue on the policy agenda, they were unable to achieve policy success. Contrastingly, industry groups managed to curtail the policy proposal's scope and mitigate some of its more costly provisions. These findings stress the necessity of adopting a more nuanced and integrated approach to analyse lobbying success, considering that the relative value of different types of resources varies across policy stages.

Although this research's findings contribute to several debates, it would be inappropriate to use them to make strong predictions. The case study's evidence may align with theoretical conjunctions, but other polities may have different underlying mechanisms. However, it is plausible to deduce that within national political systems, policymakers might be even more open to pressure politics when making decisions related to agenda-setting, driven by their motivation for re-election (Jones & Baumgartner, 2005). Similarly, one might anticipate that national policymakers would be comparably open to expertise-based lobbying in the policy formulation stage as tend to be risk-averse when crafting policy proposals (Bernhagen, 2013; Flöthe, 2019). Thus, while the aim of this research is to advocate for a new research agenda that investigates the interplay between policy process studies and interest group literature, it is conceivable that its findings travel well to other political systems.

Despite interesting pathways for future research the paper also makes important contributions to the extant literature. First, while the neopluralist stream of research has extensively analysed 'when, why, and to what extent interest groups are powerful' (Baumgartner & Leech, 1998, p. 134), little research has explored varying patterns of interest group success across distinct policy stages. In this neopluralist vein, this research contributed to a more comprehensive understanding of interest groups success, highlighting noteworthy differences between distinct policy stages. Second, the paper brings novel insight into the reputation-building behaviour of a powerful supranational institution (Braun & Busuioc, 2020). The findings suggest that the Commission is adaptable and aptly adjusts its receptivity towards interest group inputs to the legislative role it performs (Bunea & Nørbech, 2023). This allows the Commission to build and defend both input and legitimacy (Bunea, 2019). Finally, this research reaffirms the importance of using illustrative case studies in interest group research, as they provide valuable insights for exploring the plausibility of new theoretical arguments (Voltolini & Eising, 2017).

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Endnotes

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- ² See https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en#approved-voluntary-schemes
- ³ See <https://www.euractiv.com/section/energy-environment/opinion/a-bitter-taste/>
- ⁴ See <https://www.fern.org/publications-insight/press-release-87-per-cent-of-europeans-support-new-laws-to-combat-global-deforestation-new-poll-shows-1963/>
- ⁵ See <https://www.greenpeace.org/eu-unit/issues/nature-food/2015/87-percent-support-laws-deforestation-new-poll/>
- ⁶ See https://www.europarl.europa.eu/doceo/document/A-8-2018-0249_EN.html?redirect
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- ⁸ See <https://www.politico.eu/article/deforestation-labeling-proposal-catches-fire-european-commission/>
- ⁹ See https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en
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- ¹⁴ See https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12137-Deforestation-and-forest-degradation-reducing-the-impact-of-products-placed-on-the-EU-market/F507836_en
- ¹⁵ See <https://www.fediol.eu/web/fediol/1011306087/list1187970109/f1.html>
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- ²² See <https://www.fern.org/publications-insight/ferns-response-to-the-proposed-regulation-on-deforestation-free-products-2437/>

²³ See <https://www.politico.eu/article/commission-adds-new-wrinkle-to-lifestyle-choices-deforestation/>

²⁴ See https://environment.ec.europa.eu/publications/proposal-regulation-deforestation-free-products_en

²⁵ See <https://www.euractiv.com/section/energy-environment/news/europe-proposes-mandatory-due-diligence-to-stop-deforestation-in-supply-chains/>