
Original Article

It's not all about the money: Explaining varying policy portfolios of regional representations in Brussels

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Abstract The literature on territorial lobbying in the European Union (EU) has paid much attention to the interaction between regional representations in Brussels and the member-state central governments, and the relations of these representations with the European institutions. Surprisingly, far less systematic research has been conducted on the policies that regional representations prioritize when they lobby in Brussels. In this article, we focus on the policy portfolios of these organizations and analyze variation concerning the domains and issues these regional representations prioritize. Empirically, we demonstrate that the size and the nature of a policy portfolio is not primarily affected by the capabilities of a regional representation, but rather results from structural ties of regional lobbyists with other public and private interests. This claim is corroborated by data collected through a telephone survey with 127 officials from regional offices and trans-regional associations. *Interest Groups & Advocacy* (2014) 3, 79–98. doi:10.1057/iga.2013.15

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Regional authorities, that is sub-state jurisdictions such as provinces, counties, regions and *länder*, mobilize in large numbers in the European Union (EU), often by establishing a permanent representation in Brussels (Donas and Beyers, 2013a). Following Swenden *et al* (2006, p. 864) we denote these actors as *regions*, which are meso-level jurisdictions situated between local units of government (such as municipalities) and the central government. The Brussels-based representations of these entities act as communication channels between the region and the European institutions. They monitor policy developments in Brussels, functioning as a kind of



'early warning systems' for regional governments, while they also sometimes take a pro-active stance, for instance by supplying key expertise to the European Commission. Hence, their activities are highly similar to those of interest organizations representing firms or citizens. Regional offices also act as intermediaries between regionally based constituencies (for example companies, NGOs, local and subnational governments) and the European institutions. These regional representations have a potentially large and diverse number of policy interests, as they aim to represent territorial interests of both a public and private nature. Similar to other interest organizations, however, they also face a 'bottleneck of attention', implying that 'only one or a very few things can be attended to simultaneously' (Simon, 1985, p. 302). Political organizations might have interests in various policy domains, and a large number of issues situated within these domains might be of concern to them. As a result of finite resources and the limited amount of information that can be processed by one single organization, however, organizations cannot get involved in every matter that is of possible interest to them. Therefore, one important question involves which policy domains and issues regional representations prioritize.

How organized interests determine their policy portfolio has scarcely been studied (exceptions include Heaney, 2004; Strolovitch, 2007). We define a policy portfolio as the set of domains and policy issues an organized interest prioritizes in its political activities.¹ The lack of research attention for an organization's policy portfolio also applies to research on regional representations in the EU. Various studies have examined the activities of regional offices in Brussels highlighting the differences in their strategies, for instance the extent to which they liaise with civil society actors (Jeffrey, 1997; Marks *et al*, 2002; Huyssuene and Jans, 2008; Rowe, 2011). However, the policy portfolio is equally relevant, as it provides a cue about what an organization stands for. Its size and nature has an important signaling function towards an organization's environment, such as political elites, constituencies and other organized interests. For instance, it indicates whether an organized interest has a rather encompassing or more specialized orientation. Another important question in this regard is whether organized interests are mostly active on distributive or regulatory policies, as these two types involve a different set of private interests and are characterized by distinct political dynamics.

One could argue that the size and nature of a policy portfolio largely reflects the resources of an interest organization and the political-institutional context within which it operates. For instance, an organization with more financial means would have a larger and more diverse portfolio. Or, an organization that depends on public grants and subsidies would have a more on re-distributive portfolio. Nonetheless, we argue that the policy portfolio of an interest organization is structurally affected by its network embeddedness, namely how the organization is connected to other actors in its environment. This is particularly the case for regional offices, which are agencies established by regional governments in order to represent regional interests in Brussels. As most of these representations have limited resources, they tend to



cooperate with other regional offices, yet also with private interests. In many instances, regional offices adopt the role of a transmission belt between regional constituencies (encompassing subnational governments, business and societal interests) and the European institutions (Greenwood, 2011). Our overall expectation is that networks with various public and private actors will affect a regional representation's policy portfolio. This article aims to explain how the size and the nature of portfolios vary across different regional representations, by next to resources and political-institutional features also taking into account their network embeddedness.

The first section of this article explains why we conceptualize the activities of regional offices at the EU level as equivalent to those of other organized interests. Next, we clarify the concept of an organization's portfolio by addressing its different analytical dimensions and formulate research hypotheses explaining its size and the nature. In the third part, we present our research design and dataset, which relies on evidence collected through a telephone survey with 127 regional officials based in Brussels. Finally, we empirically analyze the policy portfolios of regional representations and discuss our most important results. Our findings suggest that the size and nature of a policy portfolio is not primarily affected by the mobilized resources or capabilities, but rather follows from how regional lobbyists are connected to other public and private actors.

A Lobbying Perspective on the Policy Portfolio of Regional Representations

In this article, we conceptualize regional offices – that is representatives of subnational governments – as equivalent to organized interests. In the following paragraphs, we argue why we consider this perspective appropriate and clarify how such a perspective can contribute to our understanding of the policy portfolio regional representations develop.

At this moment, more than 400 territorial interest organizations are active in Brussels (Donas and Beyers, 2013a). They represent a wide variety of sub-state jurisdictions, such as regions, provinces and cities. In addition to the regional offices analyzed in this article, these territorial interests also include associations of all regions in one member-state (that establish a single representation for the entire subnational tier of this country) and associations that consist of regions from different member-states, or so-called trans-regional associations. These regional representation sometimes engage in state-like practices, for instance when they rely on a liaison office that functions as an unofficial embassy. Yet, the fact that they often act collectively, for example when they establish a trans-regional association with other offices, makes them rather similar to interest organizations. In this regard, it is no surprise that some previous studies on the relations between regional authorities and the EU relied strongly on interest group literature (for instance Marks *et al*, 1996,



2002). Still, although territorial interests and local governments are regularly mentioned in reviews of the EU interest population (Greenwood, 2003), or referred to in broader studies on organized interests (Salisbury, 1983; Gray and Lowery, 1996), especially in the European literature they rarely are a key unit of analysis in interest group studies (exceptions from the US scene include Cammisa, 1995; Haider, 1974; Marbach and Leckrone, 2002).

One could question the applicability of the interest group concept in this particular field. Indeed, some regional authorities obtained formal access to EU policy-making processes through institutional channels such as the Committee of the Regions (CoR) and the Council of Ministers (more precisely on the basis of article 203 of the Amsterdam Treaty; see Hooghe, 1995, p. 180; Hooghe and Marks, 1996; Tatham, 2008). Yet, such formal access points are not inconsistent with a conceptualization of these actors as organized interests. That is, a limited number of functional interests are also granted formal access. For example, labor unions and business organizations are still qualified as interest groups, notwithstanding their degree of ‘institutionalization’ through the *European Economic and Social Committee* or the *European Social Dialogue* (Coen and Richardson, 2009). Furthermore, it is questionable whether an inclusion in the CoR or the Council enlarges the influence of regional interests. Access to the Council is available to only a very small number of regions, and even if such access is granted, regional officials are expected to represent the position of their member-state as a whole (for this reason, some scholars qualified access to the Council as being merely symbolic; see Hooghe, 1995, p. 180). Likewise, the CoR offers few powers to regional authorities, as it has only an advisory function. Again, central state governments play a vital role, as it is usually the prerogative of the central government to assign the members of the CoR. All in all, similar to traditional Brussels-based interest groups, regional authorities lack a strong formal position, and therefore frequently engage in activities that resemble the practices of interests groups. By establishing lobby-networks, cooperating with other regional interests and allying with private interests, these regional offices aim to strengthen their role and position in the EU policymaking processes.

One of the reasons for studying the substantive nature of policy portfolios is that this helps us to highlight the *representative character* of regional offices. A closer look at what sort of topics are prioritized gives us a sense of the extent to which the lobbying activities of a regional office are inspired by other public and private actors (see also Halpin and Nownes, 2013). In order to establish its policy portfolio – the overall set of issues and domains an organized interest invests resources in – interest group officials need to translate their broad mission – in casu the representation of their regional constituency – into specific political efforts. This process of policy prioritization by individual organizations is a crucial but often overlooked ingredient of the policy process. Still, most exchanges with policymakers revolve around issue-related expertise and information exchanged during such encounters affects



policymakers' understanding of a particular policy matter. As organized interest works on various topics with varying degrees of intensity, the nature and the size of policy portfolios can be quite diverse (Strolovitch, 2007). Whereas the broad mission of different organized interests might be quite similar or even identical, how organizations translate their general orientation into political action can vary considerably (Fraussen, 2013). All Brussels-based regional representations fulfill a similar function and gain their legitimacy from defending regional interests. Nonetheless, as has been demonstrated in several case studies, their policy objectives can be highly different (Jeffrey, 1997; Moore, 2006; Greenwood, 2011; Rowe, 2011). Moreover, such differences are not only a matter of variation across member-states. For example, Criekemans showed that the priorities of the Belgian regions – Flanders and Wallonia – varied considerably (Criekemans, 2010). The Flemish government considers EU regulatory policies as a key component of its EU policy and its representation in Brussels is generally active on a wide range of regulatory and re-distributive policy topics. Although the Walloon Region enjoys identical political competencies, its regional representation has a much more specialized policy portfolio as it mainly focuses on re-distributive policies, such as the Interreg program.

To clarify the varying nature and size of policy portfolios, we explicitly take into account the overall context in which these regional offices are embedded and acknowledge their dependence on other organizational entities. Our starting point thereby is social network and exchange theory, which presumes that dependencies between actors strongly shape their behavioral practices (Pfeffer and Salancik, 1978). These dependencies and networks are expected to affect the perceptions, beliefs and actions of organized interests. They may for instance promote shared understandings and affect policy portfolio development. As Strolovitch extensively demonstrates in her work on affirmative advocacy:

there is no objectively determined set of issues that are central to a group's mission or niche. Rather, it is (...) perceptions about and constructions of their missions and niches that are key, perceptions and constructions that are influenced a great deal by the same factors that suppress levels of activity on some issues while boosting activities on other issues. (2007, p. 108)

The social context, in particular the interaction between regional offices and other stakeholders, is thus highly relevant for the construction of policy portfolios. First, regional offices operate in a crowded environment in which numerous other interests – businesses, labor unions, research organizations and NGOs – are active. This implies that they face competition from other interests in seeking attention from EU policymakers. On the other hand, some of these organized interests can also become providers of useful information, or even allies. Second, while regional offices formally represent regional governments, in many cases they might also act as intermediaries for private interests such as companies, local governments or civil society organizations. In this way, the regional office acts as a transmission belt that



not only represents the regional executive *stricto sensu*, but also functions as a spokesperson for a large number of societal interests that are located in the region. In some cases regional offices could be allies of particular economic and functional interests that are strongly tied to a region, such as harbors, airports, research institutes or specific industries. The support of a democratically elected government and its Brussels-based representation might be valuable for these parties, as it increases the political credibility and legitimacy of their claims.

We distinguish two dimensions in the policy portfolios of a regional representation. On the one hand we have the size of the portfolio, which relates to the number of policy domains or issues, covered by a regional representation. Interest group communities usually encompass a large number of rather specialized organizations and a small, but often well-resourced, set of more generalist associations (Browne, 1990; Heaney, 2004; Soule and King, 2008; Halpin and Binderkrantz, 2009; Halpin and Thomas III, 2011). We expect a similar pattern for the Brussels-based community of regional offices; some of these offices will have a very specialized portfolio, whereas others cover broad interests that are not confined to one particular sector. On the other hand, we have the re-distributive and/or regulatory nature of the portfolio. Following Lowi (1972), re-distributive and regulatory issues are expected to involve a different set of private interests and exhibit distinct political dynamics. Generally, we expect that regional offices will be very active on re-distributive matters, such as the allocation of structural funds or the development of trans-European transportation links, which directly affect regional public budgets and provide regional political elites with additional policy opportunities. This makes that the stakes in such dossiers are very high. Regarding regulatory issues – for instance safety regulations for chemical or food products – private interests (such as business, labor or consumer groups) often are directly affected, and therefore will demonstrate a high level of activity. We expect that the exchanges these private interests have with regional offices on these topics may considerably shape the latter's portfolio. In general, while re-distributive issues mostly allocate European budgetary resources directly to the regional government, the impact of regulatory issues often targets a more narrow constituency of a region, for instance a specific economic sector or a particular industry.

Research Hypotheses

This section presents our hypotheses concerning the size and nature of policy portfolios. Do resources and political-institutional factors largely determine the portfolios of regional offices? Or are these portfolios primarily shaped by input from other actors with whom the office frequently interacts? The information and expertise provided by various regional businesses, farmers' associations, consumer groups, transport sector or environmental NGOs can be highly relevant for regional offices.



Moreover, within a regional executive, or its Brussels' representation, different (and sometimes incompatible) views can exist regarding the domains or issues that need to be prioritized (Schlozman and Tierney, 1986). As a result, establishing a policy portfolio that satisfies an entire constituency, frequently represents quite a challenge (Schmitter and Streeck, 1999 [1982], p. 15). Often, organizational objectives are presented in a very broad way, relating to the general interest of a region (for instance, economic development and prosperity), while the policy portfolio – that is the set of domains and issues in which organizational resources are invested – is geared to a particular subset of that constituency (for example regulatory matters of concern to particular businesses) (Moe, 1980; Salisbury, 1983; Strolovitch, 2007).

To account for the varying size and nature of policy portfolios, we first consider the resources of a regional representation. It is generally hypothesized that more resources lead to an expansion of the breadth of policy engagement (Halpin and Binderkrantz, 2009). Therefore, we expect that resourceful representations are more likely to invest in many domains and policy issues (Marks *et al.*, 1996; Nielsen and Salk, 1998). However, this effect will be particularly strong for policy domains and issues of a regulatory nature. Owing to their more specialized and technical nature, these issues are considered more demanding in terms of time investments and (human and financial) resources. In short:

Hypothesis 1: The more resources a regional office mobilizes, the larger the size of its regulatory policy portfolio.

Next we test for two key political-institutional features of the context in which regional representations operate. Regions with many policy responsibilities need more information on EU policies, as they are to a greater extent affected by EU policies that need to be transposed and implemented. These highly autonomous regions are therefore expected to have a larger regulatory policy portfolio (Marks *et al.*, 1996). In addition, regions that acquire substantial EU-funding will try to preserve the acquired financial resources. It seems likely that officials representing such regions will strongly focus on these re-distributive policies. In short, our two hypotheses taking into account the political-institutional context are as follows:

Hypothesis 2: The more a region enjoys higher levels of self-rule, the larger the size of the regulatory policy portfolio of its Brussels-based regional representation.

Hypothesis 3: The more EU-funding a region receives, the larger the size of the re-distributive policy portfolio of its Brussels-based regional representation.

Our third set of hypotheses relates to an organization's network embeddedness. As we assume that ties to other stakeholders are critical to explaining the policy portfolio of regional representations, we specifically consider whether Brussels' offices establish

networks with other regional offices, or public and private actors at different levels of government. In earlier work, we demonstrated that regional offices are formally and informally connected to each other, through, respectively, their membership of trans-regional associations (Donas and Beyers, 2013a) and exchanges with other Brussels offices (Donas and Beyers, 2013b). Furthermore, for their political activities, regional representations rely on input from other actors, such as their subnational constituency and governmental actors at different levels, yet also EU-level public and private interests (see also Rowe, 2011). This also reflects one of the rationales behind establishing a Brussels representation, namely enabling regional authorities to monitor the policy environment and establish networks with other stakeholders.

We expect that the size of the re-distributive and regulatory policy portfolio will be affected by these contextual factors. As re-distributive matters largely depend on intergovernmental bargaining in the Council of Ministers, we expect that actors who seek influence on such policies will strongly rely on relations with other domestic – national and regional – policymakers. As a result, extensive ties with other domestic policymakers – for instance officials of other regional offices – should predict the size of the re-distributive policy portfolio. In order to influence these issues, a regional office requires information to woo its national Permanent Representation, while also close cooperation with other regions from its country may be helpful. As a result, we expect that regional representations that are more active on re-distributive matters will mostly interact with regional offices from their own country;

Hypothesis 4: Regional offices that have most of their information exchanges with other regional offices from their own country, have a larger re-distributive policy portfolio.

In addition to domestic networks, regional authorities can also aim to obtain their policy objectives through trans-regional associations (Donas and Beyers, 2013a). In this regard, two outcomes seem possible. These networks could function as a substitute for some of the lobbying activities of the office, thus resulting in a smaller policy portfolio for the regional office. On the other hand, such formal networks also provide relevant knowledge to regional representations, and in this way possibly expand their portfolio. Some earlier work has shown that the majority of these associations focus on matters of a distributive nature, such as ‘community development’ in geographically connected regions (for example NSPA *Northern Sparsely Populated Areas*) and ‘research and innovations’ (for example ERRIN *European Regions Research and Innovation Network*) (Borras, 1993; Weynand, 1996; Sodupe, 1999). Therefore, we hypothesize that Brussels offices that have many ties with these associations will generally be more active on re-distributive issues:

Hypothesis 5: The more regional authorities that belong to many trans-regional associations, the larger the re-distributive policy portfolio of their regional representation.



Finally, two other factors are believed to explain the size of a representation's regulatory policy portfolio. In order to assess the implications of particular policy measures, policymakers often rely on information and expertise from societal actors. The need for input from regional private interests could even be higher in the case of regulatory policies, given their more specialized and technical nature. Therefore, we hypothesize that regional offices with ties with private regional interests will have a larger regulatory policy portfolio. In addition to these networks with private interests, we expect regional representations that need information on regulatory matters will exchange information with regions with other countries, rather than become involved in trans-regional associations (given that the latter are more likely to focus on re-distributive matters). In sum:

Hypothesis 6: Regional offices that establish contacts with regional societal interests have a larger regulatory policy portfolio.

Hypothesis 7: Regional offices that have most of their information exchanges with regional offices from other member-states have a larger regulatory policy portfolio.

Data and Research Design

An important part of our project consists of the systematic mapping of territorial representations that are active in Brussels. Here, we relied on data collection techniques that are becoming increasingly common in research on organized interests (Berkhout and Lowery, 2007; Halpin and Jordan, 2011), combining directories published by private organizations with registers created by the European institutions. We included regions in our sample if they met three criteria, namely being located at the first level below the central government (1), not being a de-concentrated administrative unit (2), and having on average a population of at least 150.000 inhabitants (3) (for details see Donas and Beyers, 2013a). This resulted in a population of 159 liaison offices and 21 partial national associations ($n = 180$), the latter are offices that represent a small number of regions of the same country.

In a next stage we coded all these regions on the basis of public available data. For self-rule we rely on the indices Hooghe *et al* developed (2010), while the dependence on EU cohesion funds was retrieved from Eurostat data. In order to measure the ties of regional offices with trans-regional associations, we coded the membership of 68 trans-regional associations (Donas and Beyers, 2013b). These data are combined with evidence collected through a large telephone survey (conducted in the Fall of 2011 and Spring of 2012). We started out with contacting 180 regional representations. In total, we were able to gather data on the policy portfolios of



127 regional representations, which implies that our dataset covers the population of Brussels-based regional representations fairly well. Of the other 53 contacted representations that did not take part in the interviews, only 17 refused to participate or did not find a suitable time for an interview. Analysis of the non-response shows that mostly Southern European regions refused to participate, yet we still have a considerable number of responses for regions in these countries (for instance Spain $n = 14$; Italy $n = 13$). For the other 36 regional representations, we have indications, through contacts with officials from the same member-state (either other regional offices or the national Permanent Representation), that these offices were recently closed down or have substantially decreased their activities, often because of the recent financial crisis, which depressed the budgets available for a permanent Brussels-based presence. The largest majority of the respondents were head of office with an average experience at the organization of about 6 years. During the interview, we also asked the number of staff the office employed; we consider this as a proxy for the amount of resources of a regional representation.

In the remainder of this article we analyze the responses to two central questions we asked in order to map the policy portfolio of these regional representations. The first question sought to discover the type of policy domains that are monitored by the regional representation. The list encompassed 18 policy domains (based on the *Comparative Agenda's Project Codebook*, including for instance domains such as 'agriculture', 'education' and 'health') and was formulated as follows:

In the next set of questions I will ask you about the policy domains your office is active in. This means that you screen on a regular basis upcoming legislation, exchange information with colleagues and report to your regional government. I will now give you a list of 18 policy domains. Could you tell me which of these are important in the sense that your organization spends a lot of resources monitoring developments in these domains?

[GO THROUGH A LIST OF DOMAINS]

The next question probed into concrete lobbying practices developed during the past 6 months and was phrased as follows:

- *Which are the EU legislative processes your office has been actively seeking attention for the interests of your region during the past six months? More concretely, we refer to proposals for directives or regulations submitted by the Commission, ongoing legislative work that involves the Council and the Parliament, or Green and White Books.*
- *Which is the most important one?*

During the interview we also collected data on the information exchanges the regional representations established with public and private actors (Donas and Beyers, 2013b). One of the questions focused on the other regional representations



with which the office had exchanged information in the past 6 months and was phrased as follows:

Now, I would like to ask you some questions about the policy networks you are involved in. Basically, it concerns the networks through which you share and exchange policy relevant information with other significant actors. Could you tell me which are, for your office, the most important Brussels-based regional representations with whom you had regular contact during the past six months?

One way to measure the propensity with which an office has exchanges with offices from other member-states is by using Krackhardt and Stern's E-I index (1988, pp. 127–128), which expresses the heterophily of actor ties, or more precisely the propensity of actors to develop contacts outside the group – in this case member-states – to which they belong. The index measures the extent to which exchanges external to a particular group (in this case linkages with regional offices from other member-states) dominate over internal ties (contacts with regional offices from the same member-state). For each regional office this index is calculated by subtracting the number of internal ties (with offices from the same member-states) from the number of external ties (with offices from other member-states), and dividing this difference by the total number of ties. The index varies between -1 (all exchanges are with regional offices of the same member-state), 0 (an equal number of internal and external links) and $+1$ (all exchanges are with offices originating from other member-states).

The question concerning contact with private actors was formulated as an open question, as interviewees were asked who were the most important societal actors – which could be companies, business associations or citizen groups – with whom they frequently interacted during the past 6 months. Afterwards, we recoded the responses into a dummy variable indicating whether or not the office established contacts with regional societal interests. Unfortunately, short telephone interviews are somewhat limited in terms of the amount of detailed evidence one can collect and this admittedly only provides a rather rough measurement. Therefore, we also include a brief qualitative account of the type of domestic interests it concerns.

Mapping and Explaining Policy Portfolios

First we address the scope of engagement of Brussels-based regional representations. Here, we distinguish between the monitoring of policy domains and political activity on specific legislative issues. As we argued earlier, regional interests may have a rather generalist orientation, as a large and diverse number of policy matters might be of interest to them. In addition, organized interests face substantial uncertainties in terms of how the governmental agenda will evolve. This uncertainty stimulates them

to broadly monitor their environment, rather than limiting their attention to one single domain (Baumgartner and Leech, 2001, p. 1204; Halpin and Binderkrantz, 2009). In other words, in order to specialize, some generalist propensity is required. Nevertheless, the actual policy involvement is expected to be more limited, as organizations face constraints in time and resources, which leads them to focus on a smaller set of issues.

As demonstrated in Figure 1, a similar observation can be made regarding Brussels-based regional interests. The horizontal axis plots the number of ‘issues’ and ‘domains’ on which an office is active, while the vertical axis shows the amount of regional offices that are active on, respectively, issues and domains. As far as the monitoring of domains is concerned, we note that the scope of attention generally is quite broad (median and mode = 11; kurtosis = -0.14, skewness = -0.37). Through the open question about lobbying activities during the past 6 months, we identified policy processes related to 39 issues in which our respondents developed lobbying activities. In contrast, the breadth of actual political engagement regarding these issues is much more limited, as most organizations focused on two legislative issues (median = 3 and mode = 2, kurtosis = 0.42, skewness = 0.42). In other words, while regional interest organizations may monitor multiple policy domains, in their concrete lobbying behavior only a limited number of legislative issues are being prioritized.

Each issue could be related to a specific Directorate-General of the European Commission (DG), the DG being the main responsible administrative unit for the legislative issue. The number of issues per DG varies from 1 to 4. Figure 2 compares

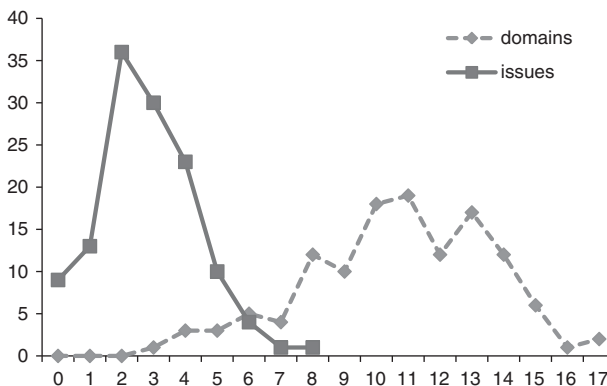


Figure 1: Issue and domain attention of regional offices (*n* = 127 regional offices).

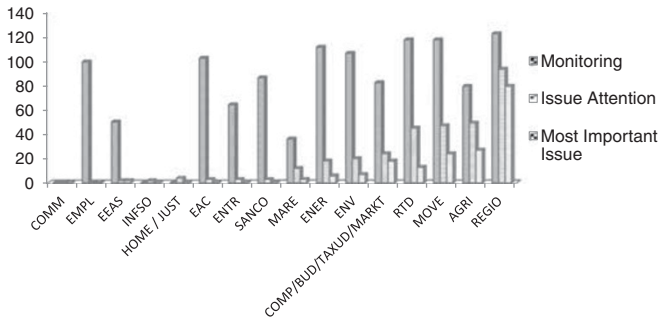


Figure 2: Field attention, issue attention and issue importance, DG-level ($n = 127$ regional offices).

how the monitoring of policy domains and political activity on specific issues varies across the different DGs. When we consider the total number of regional interests mobilizing on each issue, we observe a strongly positively skewed distribution. Whereas the skewness for domain attention and issue attention is, respectively, -0.75 and 1.70 , for the most important issue the skewness is 2.83 . This means that although regional interests specialize at the individual level, at the aggregate level policy attention is rather concentrated. Figure 2 shows that regional offices spread their monitoring activities across several DGs. Nonetheless, actual lobbying behavior varies considerably across these venues. Only in the case of DG Regional Policy (REGIO), we observe that the great majority of interested regional offices also engages in lobbying activities (84 per cent). A similar pattern can be discerned for DG Agriculture (AGRI, 55 per cent). For all the other DGs, a far lower proportion of the interested regional offices demonstrate actual political engagement.

It is clear that DG REGIO attracts most lobbying, as it is the center of attention for a considerable number of regional offices. Obviously, it is no surprise that regional policies are a key concern for regional offices, given their considerably budgetary implications for many regions. Still, many regions have competences in a wide range of policy domains. Some regional representations have established a policy portfolio that goes beyond the crowded lobby scene concentrated around DG REGIO. In order to assess the varying nature and size of policy portfolios, an analysis on the level of the particular policy issues is provided. Of these 39 issues, nine referred to DGs that Broscheid and Coen (2007) coded as re-distributive, the other 30 are under the auspices of DGs whose overall competence is considered of a more regulatory nature. Yet, we have to be careful with relying on the DG for measuring the nature of a policy issue, as also DGs with strong re-distributive responsibilities (for example agriculture) may initiate regulatory policies (or vice versa). By taking a closer look at each issue, we coded 24 issues as regulatory and nine as re-distributive.² Among the latter, we count the reform of the common agricultural policy and cohesion policies. The regulatory issues concern matters such as the Air Quality Directive or



the Financial Transaction Tax. However, a simple count of the number of distinct legislative issues provides a wrong impression. Although more regulatory issues were named, on average a Brussels office is active on 1.8 re-distributive and 0.5 regulatory issues. This means that generally, regional representations are 3.5 times more active on re-distributive issues compared to regulatory ones, which shows a clear skewness of attention to a limited number of re-distributive issues, whereas regulatory issues represent a rather particular niche market.

For our analyses we created two count variables for the regulatory and the re-distributive policy portfolio, each measuring the number of regulatory or distributive issues that an office prioritized in its lobbying activities. Both indices are unrelated ($r = 0.11$, $P = 0.2342$), which means that they point at different portfolio types. Representations that lobby extensively on regulatory issues are thus not more likely to lobby on re-distributive issues, and vice versa. As already mentioned, about 24 issues we identified are regulatory in nature. Whereas these issues are of a concern to a rather small number of regional representations (on average three offices per issue), the nine re-distributive issues attract much more attention (on average 29 offices per issue). To summarize, it seems that we can distinguish three groups of offices, namely a small set whose focus is mostly on monitoring, a large set that is mainly concerned about re-distributive lobbying and a smaller set that in addition to re-distributive issues also concentrates on regulative lobbying. The lobbying by regional representations is thus strongly geared to re-distributive issues, as almost all regional representations (90 per cent of the interviewed offices) have re-distributive issues in their portfolio. Regulatory lobbying, in contrast, is conducted by a much smaller set of actors (38 per cent of the interviewed offices).

In order to gain more insight into these differences, Tables 1 and 2 present various Poisson regression models predicting the number of re-distributive and regulatory issues a regional office has in its portfolio. Our main expectations are that the size of the regulatory and re-distributive policy portfolio will be shaped by the network embeddedness of a regional office, yet also by its mobilized resources and political-institutional features, such as the amount of self-rule of the region and its dependence on EU-funds.

Generally, we have no strong evidence in support of the hypotheses predicting the size of the re-distributive policy portfolio. Yet, this could be because of the fact that this dependent variable is characterized by a high level of concentration, as almost all regional offices have a considerable number of re-distributive policy issues in their portfolio. Still, one variable seems to be relevant. As expected, the more membership ties an office has to EU-level trans-regional associations, the more a policy portfolio consists of distributive issues. None of the other factors – staff-resources, self-rule, internal orientation or the dependence on EU-funds – is found to have an impact on this component of the policy portfolio.

It is interesting to contrast these findings with the models predicting the size of the regulatory portfolio. Although regional offices are highly similar in terms of their

**Table 1:** Explaining the size of the re-distributive policy portfolio (Poisson regression results, $N = 127$)^a

	<i>Model 1: staff</i>	<i>Model 2: staff+self-rule +dependence on EU-funds</i>	<i>Model 3: staff+self-rule +dependence on EU-funds+networks</i>
Intercept	0.559*** (0.11)	0.425 (0.39)	0.258 (0.40)
Staff size (log)	0.111 (0.07)	0.104 (0.08)	0.090 (0.09)
Cohesion funding per capita (log)	—	0.016 (0.06)	0.033 (0.06)
Self-rule	—	0.007 (0.03)	-0.048 (0.04)
Affiliations with trans-regional associations (log)	—	—	0.282* (0.13)
Networks with regional private actors	—	—	0.160 (0.17)
E-I index	—	—	-0.224 (0.14)
<i>Model fit:</i>			
DF	125	123	120
-LL	-74.5026	-74.4377	-70.6148
χ^2	87.9313	87.5218	86.6596

^aSignificance levels are based on model-based standard errors (in parenthesis).

† = < 0.1, * = < 0.05, ** = < 0.01, *** = < 0.001.

re-distributive portfolio, some factors, which were expected to positively influence re-distributive lobbying, have the opposite effect on the size of a region's regulatory policy portfolio. For instance, the more outward-looking a regional office is – that is exchanging information with regions originating from other member-states – and the lower its dependence on EU-funds, the larger the amount of regulatory issues in its policy portfolio. In addition, while many membership ties with trans-regional associations result in a larger re-distributive portfolio, it decreases the size of the regulatory portfolio. All these findings suggest that regions with a large regulatory portfolio are characterized by a different network position in the Brussels arena.

We also learn that the ties with regionally based interest groups lead to a larger regulatory policy portfolio. While we were only able to control the presence of such ties with a dichotomous variable the qualitative evidence from our interviews confirms this picture. Respondents with a considerable number of regulatory policy issues in their portfolio were more eager to report on their relations with regional

Table 2: Explaining the size of the regulatory policy portfolio (Poisson regression results, $N = 127$)^a

	<i>Model 1: staff</i>	<i>Model 2: staff+self-rule +dependence on EU-funds</i>	<i>Model 3: staff+self-rule +dependence on EU-funds+networks</i>
Intercept	-1.291*** (0.25)	-0.997 (0.77)	-0.665 (0.81)
Staff size (log)	0.465*** (0.13)	0.275† (0.15)	0.21 (0.15)
Cohesion funding per capita (log)	—	-0.249* (0.107)	-0.290* (0.12)
Self-rule	—	0.111† (0.06)	0.241** (0.09)
Affiliations with trans-regional associations (log)	—	—	-0.701* (0.30)
Networks with regional private actors	—	—	0.533† (0.29)
E-I index	—	—	0.483* (0.24)
<i>Model fit:</i>			
DF	125	123	120
-LL	-104.6365	-100.3163	-94.9161
χ^2	154.9725	143.2876	128.7996

^aSignificance levels are based on model-based standard errors (in parenthesis).

† = < 0.1, * = < 0.05, ** = < 0.01, *** = < 0.001.

private interests, in particular connections with employer associations and companies. In some instances, it concerned ties between regional offices and large multinational corporations that have their headquarter in that particular region.³ Furthermore, also less high-profile connections were reported, such as ties with harbors and companies in the energy, transport and pharmaceutical sector. Some regional offices even have integrated this private–public partnership in their organizational set-up, for instance by having seconded private sector specialists in their staff or by establishing an advisory board consisting of representatives from the public and the private sector. Although admittedly these are rudimentary findings, they correspond with our characterization of regional offices as transmission belts between three types of actors: the regional government, regionally based interest groups and the EU institutions.

When considering political-institutional variables, we notice that as expected more self-rule increases the size of the regulatory policy portfolio, whereas it did



not have an effect on the amount of re-distributive issues. Our results also show that the offices representing regional authorities that receive considerable EU cohesion funding are much less active on regulatory issues. One possible explanation is that in regions who receive higher levels of cohesion funding (mostly Southern and Eastern European), civil society is often still young and developing, and consequently less able to provide relevant input on regulatory matters to its regional office (on this matter see for instance Börzel, 2010).

Finally, our non-result for the amount of mobilized resources, measured as the staff size, casts an interesting light on our conceptualization of organizational capabilities. Although a bivariate model with only this variable would lead us to expect that more resources lead to a much larger regulatory portfolio (Model 1 Table 2), this effect disappears when we gradually add other explanatory factors. Moreover, a comparison of the difference between Models 1 and 3 demonstrates that a model that accounts for contextual network factors has a much better statistical fit ($2(-LL - -LL) = 27.17$, $\Delta df = 5$, $P = 0.0001$) than a model that only accounts for mobilized resources. Accordingly, the staff size itself has no direct implications for an office's policy portfolio, when controlled for the network embeddedness of the latter. This has also some practical implications for regional policymakers who establish regional offices. It means that more staff will only result into an expanded portfolio if this increase in resources leads to a better connectedness with other EU level and domestic stakeholders.

Conclusion and Discussion

Whereas much earlier work on EU territorial lobbying focused on the interaction between regional offices and central state governments, or their relation to the EU institutions, less attention has been devoted to the policies these regional representations prioritize. We consider a policy portfolio as a crucial component of an interest organization's political activities, which clarifies the type of interests that is represented. Although regional representations to the EU all fulfill a similar function, there are considerable differences regarding the number and nature of issues they prioritize. Moreover, while the jurisdictions that these regional representations represent frequently have a large and diverse set of interests, most of these offices rely on limited resources. Therefore, not every domain or issue of interest can be included in the organization's portfolio. In this article, we demonstrated that the Brussels-based regional representations usually monitor developments in various policy domains. However, their lobbying activities are much more restricted and generally remain limited to two legislative issues.

From our analyses of these policy portfolios, it appears that three types of regional representations can be distinguished: a group that primarily focuses on monitoring, a large group that mainly concentrates on re-distributive issues and a small group that in addition to these re-distributive matters also engages in lobbying on issues of a

regulatory nature. If we consider the characteristics of these regional representations, we observe that only a limited set of regions are likely to engage in regulative lobbying, more specifically those who enjoy much autonomy and have ties with regionally based interest groups. Re-distributive lobbying activities appear to be less strongly linked to these features, and can only be predicted by their connections to trans-regional associations. Hence, the focus of lobbying by regional representations considerably depends on structural connections of lobbyists to other public agencies and private interests.

To conclude, we highlight the broader implications of our findings as well as some limitations. First, our approach demonstrates that an interest group perspective provides an adequate framework for analyzing the political practices of regions at the European level. Second, we need to admit that we cannot draw strong causal conclusions from our finding. For some factors, for instance resources, one can imagine that they precede the formation of policy portfolios, but for other factors the causal order is much less obvious. Yet, by systematically identifying predictive factors, we were able to point at some social mechanisms and scope conditions that are connected to specific policy portfolio's. Finally, confirming other research our findings indicate that lobbying needs to be conceived as a highly contextualized practice, in which networks play a crucial role (Braun, 2012; Heaney and Lorenz, 2013; Walker and McCarthy, 2010). Therefore, the nature of these policy networks in which public and private actors intermingle needs to be examined in more detail in future research. Considering that the boundaries between so-called private and public interests become increasingly blurred (see Green-Cowles, 2003), the role of regional public and private interests as well as their interdependencies should be taken into account when analyzing interest group communities and policymaking processes in the European Union.

Notes

- 1 Note that we deliberately do not speak about an organizational policy agenda, as we seek to differentiate attention at the organizational level (portfolio) from the more aggregate policy agenda that is situated at the level of specific institutional venues (for instance the governmental agenda) or political systems (such as the EU political agenda).
- 2 Sometimes legislative proposals might be difficult to classify as regulatory or distributive. In these cases we coded them as mixed and analyzed them separately. Not a single variable turned out to be significant, which is in line with our other findings.
- 3 Owing to the fact that we promised anonymity to our respondents, we are not able to present very concrete cases including names of offices and/or the companies.

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