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Evaluating Pluralism: Diversity of Interest Groups' Policy Demands and Preference Attainment in the European Commission's Open Consultations. Evidence from the EU Environmental Policy.

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## **Abstract**

How is the EU interest group system structured in terms of the aggregate distribution of interests groups' policy preferences and levels of preference attainment? And, when examined from this perspective, to what extent should we adjust the commonly held view that the EU is a pluralist system in terms of interest representation and intermediation? The study addresses these questions by proposing a systematic, empirical investigation of the pluralist accounts based on two dimensions. The first dimension looks at policy issue characteristics and captures the *plurality of preferences* articulated by interest groups across issues. The second dimension captures levels of *achieved preferences* across different advocate types, with the aim of identifying any potential bias in terms of influence over policy outcomes in favour of some type of interests. The study examines EU lobbying in the context of EC environmental open consultations and develops three indexes measuring plurality within the EU interest group system. The empirical analysis shows that, at least in the area of environmental policy, the EU interest intermediation system does not fit a *classic pluralist* approach, but it is best described by what the study identifies as a *constrained pluralist* view. The findings indicate on average rather moderate levels of diversity of preferences articulated on issues, low to moderate levels of heterogeneity of policy preferences within interest type and a pattern of significantly higher levels of preference attainment on behalf of organizations representing business interests.

## **Keywords**

EU system of interest representation, European Commission, open consultations, policy preferences, preference attainment, environmental policy.

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Max Weber Fellow, 2013-2014*



## INTRODUCTION

Developing a participatory and inclusive policymaking process within the European Union has been a constant concern for the architects of European integration in the last 20 years (Kohler-Koch and Finke 2007). Interest groups are widely perceived as channels through which societal interests express their policy preferences and as key actors in effective problem solving (Finke 2007). Recent contributions to the study of the EU interest group system provide valuable insights into which interest groups are active in each policy area (Greenwood 2007a; Geyer 2001), about their capabilities and resources (Bouwen 2002; Mahoney 2007b, 2011), lobbying strategies or access to different institutional or “influence venues” (Broscheid and Coen 2007; Bouwen and McCown 2007; Mazey and Richardson 2006, Mahoney 2007a). However, a systematic, quantitative analysis of the policy space described by interest groups’ discrete policy preferences and, most importantly, lobbying success is currently rather an exception in the literature (see however Bunea 2013). Currently, the literature lacks an evaluation of the EU interest intermediation system based on a detailed analysis of interest groups’ formally articulated demands on a set of well-defined, discrete policy issues characterizing different policymaking events in one or more policy domains.

The present study addresses this by asking the following two inter-related research questions: *how is the EU interest group system structured in terms of the aggregate distribution of groups’ formally articulated policy preferences and their levels of preference attainment?* And, *when examined from this perspective, to what extent should we adjust the commonly held view that the EU is a pluralist system in terms of interest representation and intermediation?*

Evaluating the EU interest group system by focusing on the level of policy issues and by systematically examining interest groups’ preferences is relevant for at least two reasons. First, mapping preferences is essential for understanding the aggregate constellation of demands formally articulated at EU level by interest organizations as alternative channels of representation within non-elected yet powerful EU bodies such as the European Commission (Greenwood 2007a; Saurugger 2008). The aggregate distribution of these preferences sets the limits within which policymakers take decisions that are politically legitimate and practically feasible (Skodvin et al. 2010, Yackee 2006a, 2006b), and provides invaluable insights into the patterns of policy conflict (Browne 1990) and interest groups’ competition (Nownes 2000; Holyoke 2009). A detailed examination of these preferences thus provides a more refined tool

for examining the EU policymaking process in terms of democratic legitimacy and policy input provided by stakeholders.

Second, estimating interest groups' formally articulated preferences is an essential prerequisite for a reliable measurement of their policy influence. This aspect has been identified as one of the most important challenges of the literature on interest groups in general (Baumgartner and Leech 1998) and that of EU interest groups in particular (Mahoney 2007b; Dür 2008b). If policy influence or lobbying success is conceptualized as "preference attainment" (Dür 2008b; Beyers et al. 2008; Leech et al. 2007, Mahoney 2007b), then a detailed estimation of interest groups' preferences is a prerequisite for any analysis focusing on estimating their lobbying success and policy influence. An accurate identification of the winners and losers of the EU policymaking is of paramount importance for identifying patterns of potential bias of the decision-making process and consequently of the interest group system in favour of some particular interests. As Beyers et al. (2008) rightly argue, "[t]he bias question is one of the most enduring and important in interest groups research. It has major normative implications for the characterisation of European/EU democracy, political legitimacy and European politics generally" (Beyers et al. 2008: 1117).

In its methodological approach, this study builds upon two well-established traditions in the literature on US interest groups. First, following Laumann and Knoke (1987), the research proposes an examination of the interest intermediation system at policy domain level, by examining several open consultations in the EU environmental area (see also Coen and Katsaitis 2013). Second, in line with Browne (1990) and Salisbury et al. (1987), the research proposes an evaluation of the plurality of the EU interest intermediation system by using issue level data. As such, the study conducts an empirical investigation of groups' policy preferences and proposes three new indexes for evaluating the level of pluralism characterizing the EU interest groups system. Two indexes measure the plurality of policy alternatives articulated by interest groups on individual policy issues, while the third is an index of groups' preference attainment across a set of issues characterizing the analyzed policymaking (consultation) events.

In constructing its theoretical argument, this study builds on both American and European literature on systems of interest intermediation, identifies two theoretical views of pluralism in the EU interest groups system and derives a set of observable implications that are tested against the empirics. It is argued that when examined from the perspective of the three

proposed dimensions, at least in the environmental policy area, the EU interest intermediation system does not fit a *classic pluralist* approach, but it is best described by what the study identifies as a *constrained pluralist* view. The results indicate on average rather moderate levels of diversity of preferences articulated on issues, low to moderate levels of heterogeneity of policy preferences within interest type and a pattern of significantly higher levels of preference attainment on behalf of organizations representing business interests.

The present analysis makes a contribution to the literature on EU interest group research in two ways. In theoretical terms, the analysis addresses one important debate in the literature regarding the most appropriate label for the EU interest intermediation system (see Coen and Richardson 2009: 337-350). The study provides in this respect one of the first detailed empirical investigations of the EU interest group system based on interest groups' policy preferences, based on which different theoretical labels proposed for describing this system can be tested. Second, the study proposes an original approach to the measurement of plurality of voices characterizing the EU interest intermediation system by computing two innovative indexes aimed at capturing the heterogeneity of policy demands articulated by interest groups, while suggesting a measure of lobbying success conceptualized as preference attainment.

The argument of the study proceeds as follows: the first part provides an overview of existing approaches to the examination of EU interest group system and explains how a more refined dimension, based on groups' discrete policy preferences, adds important information to the understanding of the system. This is followed by a discussion of the theoretical considerations based on which the diversity and preference attainment indexes are computed to capture the plurality of the interest intermediation system. Part three outlines the research design. Part four presents the proposed plurality indexes and discusses them in the light of the existing pluralist accounts of the EU interest representation system. Section five concludes.

## **1. CURRENT APPROACHES TO EVALUATING THE EU SYSTEM OF INTEREST REPRESENTATION**

The existing literature describes the EU interest group system based on two main research agendas. The first one focuses on the interest group population active at EU level (Berkhout and Lowery 2011, 2010, 2008; Wonka et al. 2010; Hix 2005; Greenwood 2007a; Coen and Katsaitis 2013). This approach focuses on the number of groups active in the EU

policymaking arena, on their advocate type and organizational form. According to this approach, the more numerous and diverse the interest groups participating in the EU decision-making events are, the closer the system is to a classic pluralist model of interest intermediation. At the end of the 1990s, Aspinwall and Greenwood (1998) described the EU interest intermediation system as being characterized by a disproportionately stronger presence and lobby mobilization of business groups. However, most of the current contributions focusing on this dimension describe the EU system as pluralist based on the fact that in general most of the existing societal, regional and national interests are represented by interest organizations at EU level (Eising 2008).

The second approach focuses on the actual access of interest groups to the EU institutions and policy process (Mazey and Richardson 2006; Coen 1997, 1998; Bouwen 2002; Eising 2007; Woll 2006). The logic behind this approach is to examine which interest groups get actual access to the decision-making processes at EU level, based on the assumption that only those organizations having access to different decision-making points can effectively channel and voice the interests they represent, becoming thus potentially of consequence over policy outcomes. Most of these contributions emphasize the “elite pluralist” nature of the EU governance system, suggesting that, in general, in terms of access to lobbying venues and key decision-making points there is a bias towards EU umbrella organizations and lobby groups representing big business (Hix 2005; Beyers 2004; Coen 1998). Hix even speaks of a “primitive pluralism” characterizing the EU intermediation system, “in which there is little countervailing power to block manipulation of the political process by the owners of capital” (Hix 2005: 231).

Based on these two approaches, the EU interest group system has been labelled as “pluralist” (Streeck and Schmitter 1991), “elite pluralist” (Eising 2007, Coen 1998) “semi-pluralist” (see also Eising 2008: 7), while Coen and Richardson (2009) prefer the term “chameleon pluralism” to capture the variation in the plurality levels characterizing the EU interest intermediation system.

The existing contributions provide essential insights, but examining an interest intermediation system based only on the two above mentioned dimensions (i.e presence in and access to the policymaking process or decision makers) presents a series of limitations. First, both dimensions provide an incomplete description of the interest group system because the information on the number and type of interest groups active at EU level does not provide any substantial insights into groups’ actual lobbying activities, policy influence attempts or policy

preferences across a series of policy issues, decision-making events and policy areas. Similar approaches to the study of US interest group and its bias representation levels, focusing on counts of interest groups, have been rightly criticized for not accurately capturing the more complex dynamics which characterize the evolution of an interest intermediation system (Lowery and Gray 2004: 20-21). Second, examining the existence of a possible systemic bias in favour of some interests should not be based exclusively on their observed or reported access to decision-making venues but rather on a systematic and more empirical analysis of patterns of interest groups' preference attainment (Lowery and Gray 2004). Third, the existing dimensions do not capture the specific policymaking context in which organizations develop their lobbying activities and say little about the formal interactions between decision makers and interest groups or between interest groups themselves. The existing literature on EU interest groups keeps silent over issues such as the level of contentiousness over policy alternatives and the diversity of competing policy demands to which decision makers are exposed to. As suggested in the classic literature on American interest groups (Salisbury et al. 1987; Browne 1990) these are all essential dimensions in analyzing the structuring of an interest group system.

However, the existing contributions have the merit of identifying two broad theoretical frameworks that are currently used to describe the EU interest group system: a *classic pluralist* approach describing a fully plural EU interest intermediation system, and a "*constrained*" *pluralist* approach, according to which the plurality of voices articulated in the system is rather limited. The present study builds upon these two approaches by proposing three alternative measures of the plurality in the system to investigate for which of the two frameworks there is more empirical support. The observable implications derived in relation to each framework are presented in the next section.

## **2. AN ALTERNATIVE APPROACH: EXAMINING POLICY ISSUES, PREFERENCES AND INTEREST GROUPS' PREFERENCE ATTAINMENT**

The present study acknowledges the premises for a pluralist interest intermediation system at EU level and proposes a more systematic, empirical investigation of the pluralist accounts based on two dimensions. The first dimension looks at issue level characteristics and captures the *plurality of preferences* formally articulated by interest groups for different policy

outcomes, across five environmental consultations. The second dimension captures levels of *achieved preferences* across different advocate types, with the aim of identifying any potential bias in terms of influence over policy outcomes in favour of some type of interests. More specifically, the study examines EU lobbying in the context of EC open consultations and it is therefore interested in the degree to which interest organizations translate their demands into the text of the policy proposal adopted by the Commission following these consultations.

The first dimension is built upon a well-established tradition in the American literature on interest groups for which the plurality of preferences articulated by private actors and their competition to get translated into policy outcomes has long been considered a key aspect in evaluating the structure of the interest group systems (Baumgartner *et al.* 2009; McKay and Yackee 2007; Golden 1998; Browne 1990; Salisbury *et al.* 1987). I argue that by examining in greater detail the discrete preferences expressed by interest organizations on a series of policy issues, one can perform a more refined test of the pluralist accounts of the EU interest group system. The level of diverse, competing preferences formally articulated during the policy formulation stage gives a reliable and more complex indication of the level of plurality of voices and policy input introduced in the EU policymaking system.

The second dimension proposed, capturing a measure of achieved preferences, allows a more subtle identification of any patterns which might characterize the interactions between interest groups and policymakers in terms of winning the policy influence game. This dimension allows a detailed observation of whether or not there is a bias within the policymaking process towards the demands expressed by particular types of interests (Baumgartner and Leech 1998). The EU interest group literature speaks of a bias in the decision-making system that favours business interests (Coen 2009, 1998; Chari and Kritzinger 2006; Hix 2005; Beyers 2004; Greenwood 2007b; Kohler-Koch 1997; Pollack 1997). This argument requires however further empirical testing as the existing contributions suffer from several methodological challenges when explaining lobbying success. For example, existing contributions rely largely on the use of interviews with interest groups' representatives, based on which a rather broad description of groups' policy preferences and lobbying success is derived (Mahoney 2007b; but see also Michalowitz 2007). This research strategy commonly focuses on a restricted number of interest groups, and is not able to capture the full universe of stakeholders involved in a policymaking event; it is only able to gather information on a group's preferences and preference attainment on

a restricted number of (main) policy issues. This approach does not usually account for interest groups' preferences on other relevant issues, thus oversimplifying the realities of lobbying within a policymaking event. As shown in greater detail in the next section describing the research design, EU policymaking events are characterized by multidimensionality. The number of issues identified per consultation ranges from 6 to 51 across the five analyzed events. As such, an accurate and reliable analysis of interest groups' success to influence outcomes should take into account all demands expressed on all issues characterizing an event with the maximum possible precision. In addition, self-reported or peer-reported levels of policy influence or lobbying success can potentially suffer from informant bias, which translates into distorted evaluations of interest representation and interest realization within the EU policymaking system.

The approach proposed by this study aims to ameliorate these challenges and allows a more refined evaluation of the relative lobbying success by proposing a measure that takes into account the universe of all issues, stakeholders and preferences identified for each policy event. Most importantly, the proposed measure of achieved preferences is sensitive to one of the most important challenges to the measuring of interest groups' lobbying success and policy influence: capturing the "amount of luck" (Barry 1980b: 350) a group has in getting its preference reflected in the policy outcome. The study computes a preference attainment index which captures both the number of other interest groups supporting the same policy preference as well as the number of interest groups opposing it. The aim of this is to capture the degree to which "the responsibility" for realizing one's policy preference is shared among different actors lobbying for the same preference as well as the intensity of "countervailing forces" (lobbying opposition) that a group faced in getting its preference translated into policy outcomes (Austen-Smith and Wright 1994; Mahoney 2007b; Dür and de Bièvre 2007; Klüver 2011). The proposed measure captures preference attainment relative to the lobbying environment described by the aggregate distribution of preferences and participation of interest organizations and is in line with what Lowery and Gray indicate as a fundamental dimension of an interest group system: "[n]umbers of allies and enemies and how they are configured across an issue domain have a direct – albeit complex – bearing on the use of influence strategies and the fate of legislation" (Lower and Gray 2004: 22).

One could argue that in order to make more substantial claims and explanatory inferences about groups' preference attainment at interest group level, the use of process tracing would be

advisable. However, this is beyond the purpose of the present research, which is interested in capturing the big picture of lobbying in a specific policymaking setting by providing an aggregate measure of preference attainment scores per advocate type, in an attempt to examine whether or not some interests, on average, are doing better in terms of getting their preferences translated into policy outcomes than others. Also, as the research tries to capture the preferences expressed by all stakeholders, performing process tracing would be virtually impossible when the number of interest groups can be as high as 184, like in the case of the consultation discussing the introduction of aviation activities in the Emissions Trading Scheme.

To examine the level of plurality characterizing the EU interest intermediation system, the research develops three indexes. First, the *policy issue diversity index* captures the diversity (plurality) of preferences expressed on issues raised within one consultation. Second, the *interest type diversity index* expresses the diversity of preferences articulated by organizations representing the same interests across issues. And third, the *preference attainment index* measures levels of preference attainment for each category of interest groups across issues and cases. Each index is discussed in detail below.

## 2.1 Policy issue diversity index

This index measures the level of diversity of preferences expressed by different interest groups on the same policy issue. It is computed based on the identification of substantially different and competing preferences expressed by interest organizations. The value of the index for issue  $j$  is constructed by (1) computing for each policy preference the proportion of the interest groups that adopted the preference from the total number of groups expressing a preference on that issue and (2) by subtracting from 1 the sum of squared shares of these proportions. The index estimates the probability that on one issue any two randomly selected interest groups adopt two different policy preferences. The mathematical expression of the index is the following:

$$H_j = 1 - \sum_{i=1}^{n_j} p_{ij}^2$$

Where, heterogeneity of preferences on issue  $j$  ( $H_j$ ):  $n_j$  – number of preferences expressed on issue  $j$ ,  $p_{ij}$  – the share of interest groups expressing preference  $i$  on issue  $j$ .

The index takes a value of 0 when all interest groups articulate the same preference on the issue or when  $p_{ij}$  equals 1 and  $n_j$  equals 1. The index takes a value of 0.5 if only two

preferences are expressed on one policy issue and the two are supported by an equal number of interest groups. A value of 0.75 corresponds to a situation where interest groups express four different policy preferences and each preference is supported by the same number of interest groups.

## 2.2 Interest type diversity index

This index captures the level of variation with respect to the preferences expressed by organizations representing the same type of interest (i.e. business, environment, consumers' rights, local government, etc.). The value of the index for issue  $j$  and interest type  $k$  is expressed by (1) computing for each policy preference the proportion of interest groups of type  $k$  that supported the preference from the overall number of groups of type  $k$  articulating a preference on that issue and (2) by subtracting from 1 the sum of squared shares of these proportions. This index indicates the probability that two randomly selected interest organizations representing the same interest type express a different preference on the considered policy issue. As already mentioned, this aims to capture the degree to which the EU interest group system displays any patterns of disciplined and concentrated lobbying activities of organizations representing the same interests. The mathematical expression of the index is:

$$H_{jk} = 1 - \sum_{i=1}^{n_{jk}} p_{ijk}^2$$

Where, heterogeneity of preferences (of interest groups of type  $k$ ) on issue  $j$ :  $n_{jk}$  – number of preferences taken on issue  $j$  by groups of type  $k$ ,  $p_{ijk}$  – the share of interest groups of type  $k$  expressing preference  $i$  on issue  $j$ .

This index works in a similar way to the policy issue diversity index. The only difference between the two is that the interest type diversity index takes into account only interest groups of the same type when computing the diversity score.

## 2.3 Preference attainment index

This index expresses the degree to which an interest group's policy preferences are translated into outputs, weighted by the amount of support and opposition the group faced from the other interest groups participating in the consultation event. This measure is computed by assigning first a score of 0 or 1 to each interest group to identify the convergence (or lack

thereof) between the group's preference and the policy outcome for each issue on which the group expressed a preference. This is weighted by an index expressing the strength of opposition the interest group had to face in terms of its expressed policy preference. This weight captures the number of interest groups adopting a different and hence competing policy preference to the one expressed by the considered interest group. This index has the following mathematical expression:

$$A_i = \sum_{j=1}^{n_j} p_{ij} O_j$$

Where, the preference attainment for interest group  $i$  :  $p_{ij}$  – preference attainment of interest group  $i$  on issue  $j$ ,  $O_j$  – the share of interest groups that expressed a substantially different preference on issue  $j$ .

In theoretical terms, this “opposition weight” can take continuous values from 0 to 1. A value of 1 (possible only in theoretical terms though) indicates a situation of strongest possible opposition to a group's preference, when only one group expressed the considered policy preference while an infinity of other groups adopted a different position. If an interest group has a value of 1 on the preference-outcome convergence score, and faces possible strongest opposition, then one can reliably infer that achieving its preference can be entirely attributed to its efforts and the group receives a 1 on the preference attainment index. Similarly, the “opposition weight” has a value of 0 in a situation where there was no opposition to the group's expressed policy preferences, as no other group addressed an alternative, competing demand to decision makers. In this situation the overall preference attainment index for the interest group will have a value of 0; although the group did achieve its preference, no competing demands were expressed and there is consequently no way to disentangle the group's contribution to the decision outcome. Of course, the index also has a value of 0 when the outcome does not correspond to a group's policy demand.

These three indexes are used to examine the level of plurality within the EU interest group system in the environmental policy domain and to investigate which pluralist label is the most appropriate for describing it. The following observable implications are derived in relation to the dimensions captured by these indexes: first, on each policy issue, the number of substantially different preferences articulated by interest groups provides valuable information about the level of plurality of voices articulated within the interest intermediation system. The more substantially different policy preferences are expressed on the same issue, the higher the

level of plurality, hence the more appropriate the label of a *classic pluralist* interest group system is. By contrast, a pattern of limited numbers of policy preferences expressed indicates a *constrained pluralist* interest intermediation system.

Second, the level of preference diversity within interest group types provides information on the levels of concentration of lobbying within each category of interests represented at EU level. A high level of preference diversity within interest type indicates a highly plural interest group system, because this creates the premises for cross-cutting preferences and lobbying coalitions that prevent any single type of interest from monopolising the policy space with only one policy alternative. By contrast, a low heterogeneity index is an indication of a concentrated lobbying force from disciplined sectoral organizations, a situation which would be more in line with the *constrained pluralist* framework.

Third, in a *classic pluralist* interest group system, characterized by no bias in favour of some particular interests, the average levels of preference attainment scores per interest group (advocate) type should not be significantly different from each other within each consultation. This would also be consistent with those accounts in the literature emphasizing the consensual nature of the EU interest group system and decision-making process in which all participants have something to gain from the decisions made across a set of issues characterizing a policymaking event (Mahoney 2008). By contrast, a pattern of significantly higher preference attainment scores on behalf of one type of interests (most commonly business) is consistent with a *constrained pluralist* interest group system. The observable implications derived from the two frameworks are summarized in Table 1 below.

**Table 1: Types of pluralism and dimensions of plurality in the EU interest group system**

<b>Dimension</b>	<b>Classic pluralism</b>	<b>Constrained pluralism</b>
<b>Policy issue diversity</b>	High	Moderate
<b>Interest type diversity</b>	High	Moderate
<b>Preference attainment</b>	No pattern of significantly higher levels of preference attainment across policy issues in favour of some interests. Absence of bias.	Patterns of moderate levels of significantly higher preference attainment scores on behalf of specific interests. Moderate levels of bias.

### **3. RESEARCH DESIGN**

This study examines the EU interest group system by analysing the policy formulation stage of five key legislative developments in the environmental policy area. The focus on the formulation stage is justified by this being considered the most popular lobbying venue at EU level, where interest groups have the highest chances to affect policy outcomes (Bouwen 2009). The focus on open consultations and the associated documentation for identifying policy preferences is supported by two aspects. First, the decision to analyse groups' written submissions to the EC has a strong justification in the literature, which emphasises the high levels of institutionalisation of the dialogue between policymakers and interest groups at EU level, that usually takes place within formal settings such as public consultations, "advisory and consultative committees, expert groups" (Greenwood 2007b: 347). Second, position documents have long constituted an important data source in the well-established literature on American lobbying, focusing on groups' formal interactions with bureaucracies and their participation in rule-making (McKay and Yackee 2007; Yackee and Yackee 2006). With some notable exceptions (Quittkat 2011; Rasmussen and Alexandrova 2012; Rasmussen and Carroll, forthcoming; Klüver 2011, Bunea 2013), EC open consultations, and the generous documentation resulting from them have been generally neglected in the literature, despite their great potential to provide essential insights as primary sources of information on European lobbying and the participation of private actors in the policymaking process.

Environmental policy was chosen for analysis for two reasons. First, this is a core EU policy area, marked by important current policy developments, in which the Union has clear competences and interest groups have complete information about what policy demands can be addressed to policymakers and about whom they should target with their lobbying. Second, DG Environment, in charge of the management of this policy, is the second most lobbied DG of the European Commission after DG Enterprise (Coen 2007). This policy domain is generally characterized by the presence of relatively large numbers of interest groups which are different in both advocate type represented (business, environmental NGOs, local authorities, etc.) and in organizational format (European federations, individual firms, national associations). They channel into the decision-making system a large variety of interests having a stake in the EU regulation of environmental issues (Coen 2007: 337). This high mobilization of various organisations assures variation in terms of interests represented in the consultation, offering thus

a good opportunity to observe a potential bias in favour of some interests in terms of preference attainment during the policy formulation stage.

Following an attentive investigation of the most important current policy developments in the environmental area, and based on data availability issues related to interest groups' policy position documents, five stakeholders' public consultations events were identified for the purpose of the present study. All five represent key policy events in the recent development of the European environmental policy and were aimed at updating or introducing new regulatory regimes regarding the reduction of CO<sub>2</sub> emissions of passenger cars, introducing aviation activities under the Emissions Trading Scheme and the corresponding implementation mechanisms, introducing a waste management framework and revising the legislation on electric and electronic waste management. Throughout the analysis the five cases will be referred to as the "CO<sub>2</sub> emissions case", "aviation case", "MRV case", "waste case" and the "WEEE case":

- 1) The consultation aimed at formulating the proposal for a Regulation setting emission performance standards for new passenger cars (2007)<sup>1</sup>. This is referred to as *the CO<sub>2</sub> emissions case*.
- 2) The consultation for formulating a proposal to include aviation activities in the scheme for greenhouse gas emission allowance trading within the Commission (December 2006)<sup>2</sup>. This is referred to as *the aviation case*.
- 3) The consultation for formulating a decision on monitoring, reporting and verification mechanisms for aviation emissions included in the ETS scheme (October – November 2008)<sup>3</sup>. This is referred to as the *MRV case*.
- 4) The consultation for adopting a policy proposal for a Waste Framework Directive (December 2005)<sup>4</sup>. This is referred to as the *waste case*.
- 5) The consultation for adopting a proposal on revising the waste electrical and electronic equipment Directive (May 2008)<sup>5</sup>. This is referred to as the *WEEE case*.

All five received media coverage in EU news portals, tackled the main topics of EU environmental policy, involved the participation of a variety of organizations and focused on

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<sup>1</sup> Regulation (EC) No 443/2009 of the European Parliament and of the Council of 23 April 2009 setting emission performance standards for new passenger cars as part of the Community's integrated approach to reduce CO<sub>2</sub> emissions from light-duty vehicles.

<sup>2</sup> Directive 2008/101/EC of 19 November 2008 amending Directive 2003/87/EC so as to include aviation activities in the scheme for greenhouse gas emission allowance trading within the Community.

<sup>3</sup> Commission Decision of 16 April 2009 amending Decision 2007/589/EC as regards the inclusion of monitoring and reporting guidelines for emissions and tonne-kilometre data from aviation activities.

<sup>4</sup> Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain directives.

<sup>5</sup> Proposal for a Directive on waste electrical and electronic equipment (WEEE).

both technical and more political or publicly controversial issues. This makes the five consultations relevant examples of EU environmental policymaking.

The analysis focuses on only one policy area and five consultation events only, due mainly to data collection constraints, as the research relies heavily on extracting interest groups' policy preferences by hand-coding policy position documents formally sent by groups to the European Commission as part of the public consultation exercise. Although this research design strategy has the essential advantage of allowing a detailed and far more precise estimation of interest groups' preferences, the human coding of documents is labour intensive, allowing for the analysis of only a reduced number of cases. The focus on one policy area might raise scepticism with respect to the generalizing power of the findings, given the fact that the literature suggests there is a certain amount of variation across EU policy areas in terms of modes of governance and interest groups' participation (Mahoney 2008: 6). I address this potential scepticism by arguing that the main aim of this study is to inquire how an alternative approach to the study of the interest groups' policymaking participation might provide a new and more sophisticated description and understanding of the structure and dynamics of the EU interest group system, that could be employed for the study of other policy areas and events. A trade-off was required between the depth of analysis, allowing a disaggregate measure of interest groups' participation, and its breadth. Primacy was given to the former over the latter and this disaggregate level of analysis is one of the main contributions made by this study.

A *policy issue* is a discrete policy problem on which the Commission explicitly asks for stakeholders' policy input. For each consultation, I identified issues based on three sources. First, for consultations requiring the submission of written position documents, the text of the Commission's consultation call was used to identify issues (consultation on the reduction of CO<sub>2</sub> emissions for passenger cars, on the waste management directive and the revision of the WEEE directive). Second, for consultations based on open-ended questionnaires, the questions of the questionnaire served to identify issues (the two consultations on the introduction of aviation activities in the Emissions Trading Scheme). Third, groups' written submissions or answers to questionnaires were used to identify issues added to the consultation agenda by groups themselves. To be considered an issue and included in the dataset, this latter category of issues needed to be recurrent across several contributions. However, a negligible number of such issues were identified. This is in line with the Commission's efforts to structure its dialogue with

stakeholders in order to keep data management feasible. To exemplify the concept of policy issue employed by this research, the following list presents the ten issues identified for the consultation on the reduction of CO<sub>2</sub> emissions for passenger cars: (1) measures assuring that the proposed target of 120g/km for the reduction of CO<sub>2</sub> emissions is reached; (2) time frame for reaching the targets; (3) including commercial vans in the regulation; (4) parameter(s) for deciding what vehicles are covered by the regulation; (5) should targets be mandatory; (6) should there be penalties for non-compliance; (7) fiscal incentives to assure target compliance; (8) harmonizing cars' labelling system; (9) establishing an EU wide car marketing code of conduct; (10) flexibilities allowed for car manufacturers to reach the target. The study analyses 107 different issues corresponding to five consultations. Table 2 presents the total number of issues and interest organizations per consultation.

**Table 2: Number of interest groups and policy issues per case**

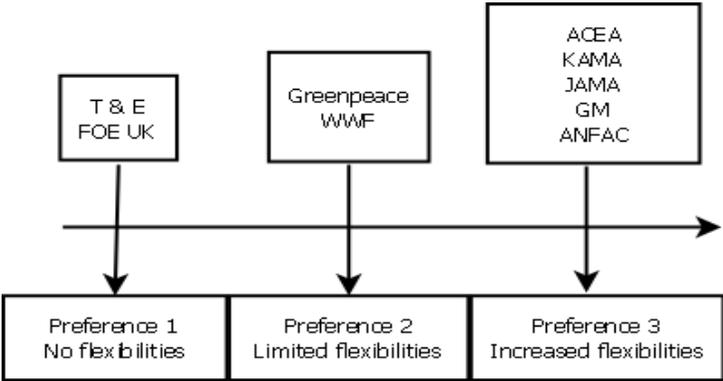
Case	CO <sub>2</sub> emissions	Aviation	MRV* aviation	Waste	WEEE**
Policy issues	10	6	51	15	25
Interest groups	45	184	37	138	164

\*MRV – Monitoring, reporting and verification mechanisms for introducing aviation activities into the Emissions Trading Scheme. \*\*WEEE – Waste Electric and Electronic equipment Directive.

The number of issues per consultation ranges from 6 to 51, showing a high variation across consultations. This is attributable to the nature of the consultation and to the consultation tools. The consultation for the introduction of aviation activities in the ETS scheme was general in its scope and therefore revolved around only six issues. The consultation on the monitoring, verification and reporting mechanisms for introducing aviation in the ETS involved 51 issues and asked for feedback on very precise technical matters. This variation provides a rather fair representation of the EU policymaking process, which is characterised by different levels of technicality of its measures within the same policy area, as well as across different policy domains.

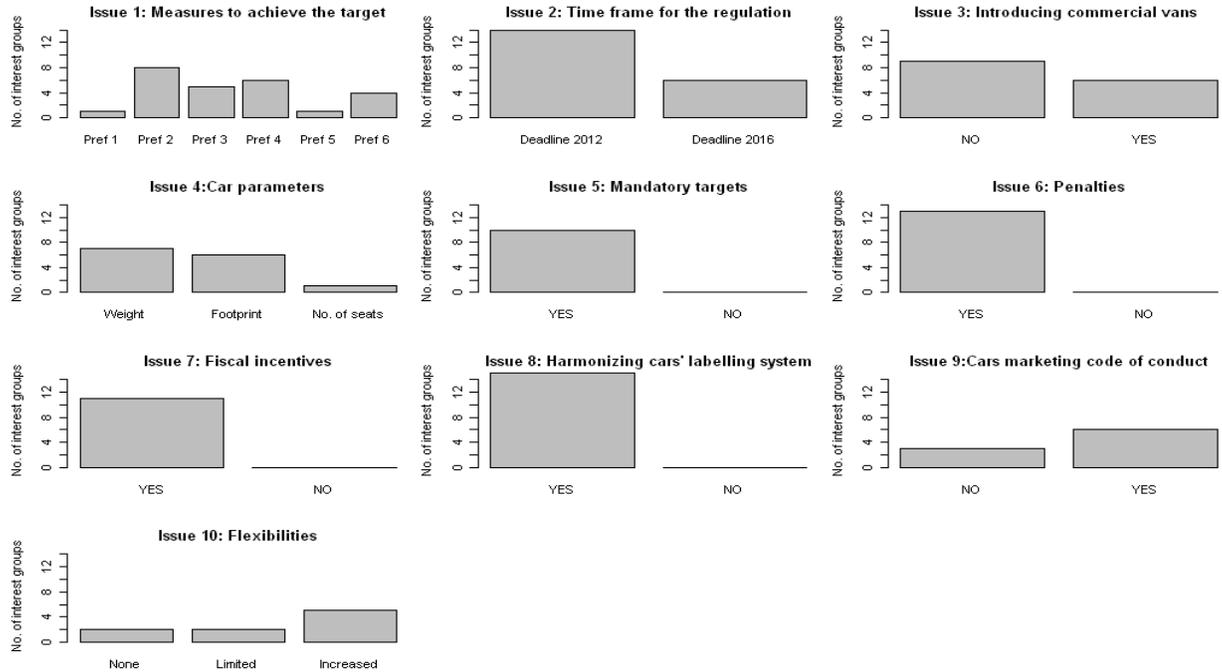
For each event, interest groups' *policy preferences* were identified based on the content analysis of the policy position documents submitted to the European Commission during the public consultation stage and of the interest organisations' answers to the online questionnaire the Commission used as a consultation tool for the aviation case. Based on sources, for each policy issue, a nominal scale was used to estimate interest groups' policy preferences. Each

preference received a value indicating that the preference is substantially different from the other preferences expressed by other interest organisations on the same issue, without saying however by how much or in which respect. This value was used in the dataset to indicate a group’s position on the identified policy issue. Interest organizations expressing the same preference received an identical score. Figure 2 illustrates the concept of policy preference employed in the present research.



**Figure 1: Interest groups’ policy preferences on the issue of what flexibilities should be allowed for car manufacturers to reach the required target of CO<sub>2</sub> emissions.** Where: T&E (Transport and Environment), FOE UK (Friends of the Earth UK), WWF (World Wide Fund for Nature), ACEA (European Car Manufacturers Association), KAMA (Korean Automobile Manufacturers’ Association), JAMA (Japanese Automobile Manufacturers’ Association), GM (General Motors), ANFAC (Spanish Association of Automobile and Tracks Association).

Figure 2 exemplifies the policy space described by the aggregate distribution of interest groups’ preferences across issues and organizations in the consultation on the reduction of the CO<sub>2</sub> emissions.



**Figure 2: Policy issues and distribution of interest groups' preferences in the consultation on the reduction of CO<sub>2</sub> emissions for new passenger cars.**

Based on the content analysis of the policy proposal drafted by the Commission post-consultation, I identified the *policy outcomes*, i.e the policy alternatives chosen by the Commission as proposed policy measures. This allowed me to estimate groups' *preference attainment* on each issue by identifying which preferences were translated into outcomes. I looked at the correspondence between an interest group's preference and the outcome formulated in the text of the proposal.

For open-ended questionnaires the identification of both issues and preferences was straightforward. However, the study had to examine the reliability of the coding scheme for interest groups' policy position documents. Two strategies were pursued. First, one inter-coder reliability test was performed on the CO<sub>2</sub> emissions for passenger cars case. A coding protocol was developed stating clearly what type of statements should be taken into account for recording a group's preference, the unit of analysis (text paragraphs addressing a specific issue), the data recording format and the guidelines for dealing with potentially less clear texts. Another coder was asked to independently identify the issues and groups' preferences on each issue. The results were encouraging: ten out of fourteen issues identified by the two coders were identical. The coding of preferences was identical with respect to 73 per cent of the interest group–issue dyads

identified (Krippendorff's Alpha = 0.77, C.I: 0.7; 0.84)<sup>6</sup>. Second, the issues identified for this consultation were cross-checked with Klüver's (2009: 541) hand-coding scheme of issues pertaining to the same event. This scheme identifies twenty categories of issues in relation to which organisations made policy statements. Seventeen of them were identified as part of my coding scheme as well, providing further evidence of a sound coding of written submissions in the present research.

The policy position documents submitted by interest groups allowed the identification of the universe of private actors participating in the public consultations. Following a thorough analysis of documents and interest groups' official websites, each interest organisation considered in the analysis has been assigned to one of the following six categories of advocate type to express the main interests represented in each event: (1) Main business – businesses whose activities were directly affected by the measures proposed (e.g car manufacturers in the consultation on CO<sub>2</sub> emissions) ; (2) Secondary business – businesses that were not directly affected by the measures (e.g. the European Association of Aluminium in the same consultation); (3) Environmental NGOs; (4) Local authorities; (5) National authorities; (6) Other (e.g. professional organizations).

#### **4. PLURALITY OF VOICES AND THE EU SYSTEM OF INTEREST REPRESENTATION**

##### **4.1 Policy issues and diversity of preferences**

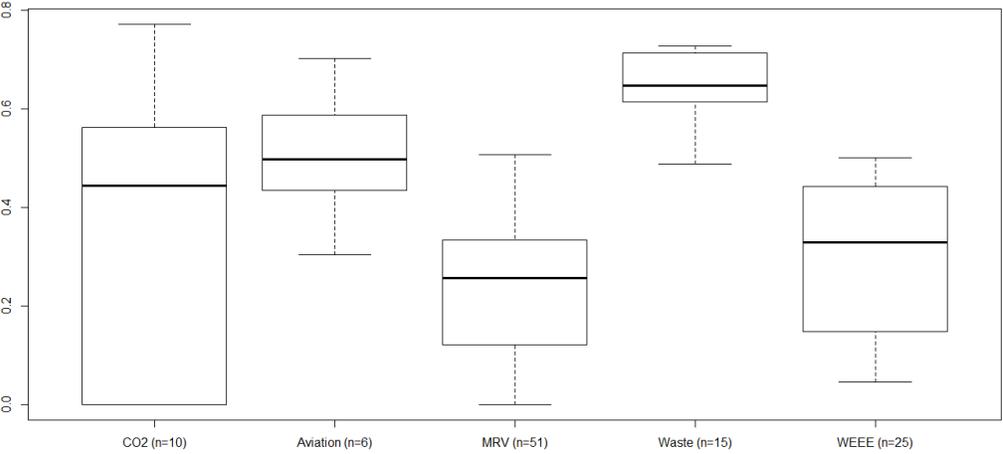
The first aggregate measure proposed for examining the plurality of the interest group system is the *policy issue diversity index*, a measure of the heterogeneity of policy preferences expressed by interest groups. On average, the consultation on the monitoring, reporting and verification mechanisms for introducing aviation activities in the ETS (the MRV consultation) displays the least diverse policy spectrum, with a median score of policy issue diversity of 0.3. This consultation was overwhelmingly attended by interest organizations representing the interests of aircraft operators and of the aviation industry. These groups expressed the same policy preferences on the same issues, displaying a pattern of disciplined and concentrated lobbying efforts, resembling more a corporatist tradition of interest intermediation. This

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<sup>6</sup> The confidence intervals for the Krippendorff's Alpha coefficient were computed using the SPSS algorithm designed for this based on Hayes and Krippendorff (2007).

homogeneity of preferences could also result from the relatively high level of technicality of the policy issues addressed in this consultation, for which reason the European Commission decided to use a semi-standardized questionnaire as a consultation tool to keep the data management feasible (Quitkat 2011: 661). While assuring a more effective communication channel of policy feedback on behalf of interest groups, the use of this consultation tool might well have reduced the plurality of policy alternatives suggested by stakeholders, although respondents were given the freedom to articulate different preferences in relation to very specific issues.

The highest plurality of preferences was articulated in the consultation on the waste framework directive, with an index median score of 0.62. This should be read in the light of relatively high levels of generality of the consultation, which invited stakeholders to provide input on the adoption of general guidelines for setting a framework on waste management at EU level. This level of generality is somehow in contrast with the more technical and hence specific nature of the consultation debate in the other four cases, as well as the fact that the Commission adopted a classic, non-standardized consultation format in which interest organizations could submit written position documents. This might have contributed to increasing the diversity of policy alternatives suggested by stakeholders as potential policy outcomes.



**Figure 3: Policy issue diversity index per consultation: n indicates the number of total issues per case**

An attentive examination of the diversity scores computed per issue for each case, reveals variation of the features of issues that get on the agenda during the policy formulation stage: one

can identify a set of contentious issues on which several, substantially different, preferences were articulated by private actors, as well as a set of issues characterized by virtually no controversy in terms of policy options. Three of the five consultations present issues on which the diversity index has a value of 0.7 or slightly higher, while two of them present at least one issue on which there is only one policy preference being articulated. The consultation on adopting a proposal for reducing the CO<sub>2</sub> emissions of passenger cars exemplifies well this variation. Here, the issue of how the proposed target for reducing CO<sub>2</sub> emissions of cars should be achieved raised more controversy than all other issues. On the contrary, issues such as making the CO<sub>2</sub> emission targets mandatory or not, introducing penalties for not complying with the targets or harmonizing the labeling of cars system across the EU to express the CO<sub>2</sub> performance of cars, raised no controversy and only one policy preference was expressed by interest groups on these issues.

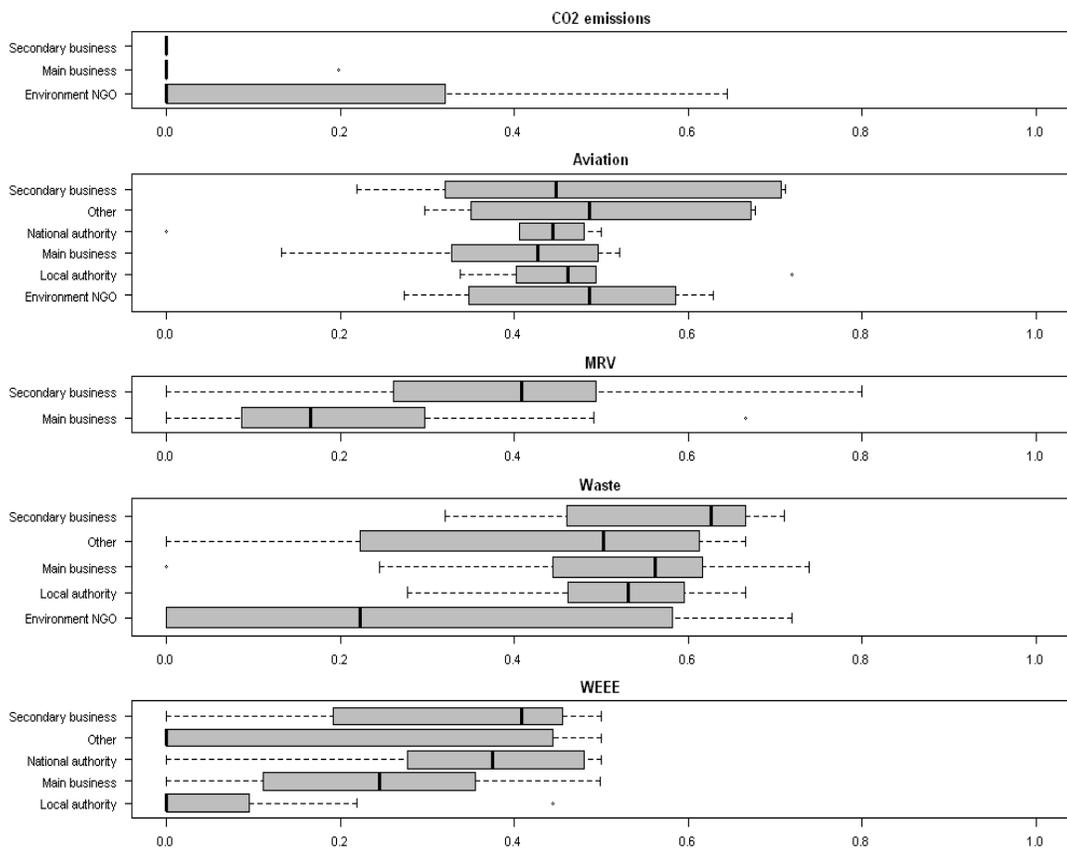
Two implications of these findings are worth mentioning. First, in terms of describing the interest intermediation system, we observe moderate levels of diversity in the preferences/demands expressed on the issues raised within the same policymaking event. In four out of the five consultations, there are moderate levels of preference diversity, in the sense that the average probability that two randomly selected groups have different preferences on an issue is lower than 0.5. On average, across policy issues and consultation events, a pattern of *constrained/limited pluralism* describes the EU interest group system. Second, although not directly related to the characteristics of the interest groups system, it is worth noting that there is substantial variation in the policy diversity index within each consultation. This variation suggests that issue-level characteristics are highly relevant when analyzing the determinants of interest groups' policy influence (Mahoney 2008). On each policy issue, interest groups' levels of preference attainment are expected to be affected by substantially different preferences competing with each other within the system (Holyoke 2009; Lowery and Gray 2004: 22).

#### **4.2 Interest type and diversity of preferences**

The second aggregate index is the *interest type diversity index*, a measure aimed at capturing the degree to which the system displays patterns of disciplined and concentrated lobbying on behalf of interest groups representing the same type of interest. The expectation is that, in a pluralist system, individual interest groups representing broadly the same type of interest or the same economic or societal sector (e.g. business, environmental organizations, local authorities) should articulate (at least at times or on certain policy issues) different policy

preferences. This diversity creates the premises for cross-sectoral lobby alliances and policy alignments, which in turn represents a guarantee against the emergence of a potentially monopolizing lobby on behalf of some specific interests (usually business). In short, the argument is that the higher the levels of this index per interest group type, the higher the level of pluralism characterizing the interest intermediation system.

Figure 4 presents the aggregate picture described by this index for the five consultations. For each case, the figure presents the values of the diversity index for those categories (advocate type) of interest organizations that expressed preferences on three or more issues. This threshold was chosen based on the assumption that measuring heterogeneity of preferences for each advocate type makes sense only by examining a relevant enough number of issues.



**Figure 4: Interest type diversity index per consultation**

The findings show a pattern of low to relatively moderate levels of diversity of preferences articulated by business interest groups, usually with the lowest plurality levels for

“Main business”. On all issues in the consultation on the reduction of CO<sub>2</sub> emissions, interest groups representing the car industry articulated the same policy preferences, showing disciplined lobbying on most environmental measures that were generally considered to be additional burdens on the car industry. Similarly, aircraft operators, the main business having a direct stake in the consultation on the monitoring, reporting and verification mechanisms for aviation activities introduced in the ETS scheme (the MRV consultation), show disciplined lobbying in terms of expressed policy preferences, with an average heterogeneity score value under 0.2.

As shown in my previous work (Bunea 2012: 117-140), in both of these consultations the interests of the European car manufacturers and aviation industries have been represented by organizations which were closely linked by inter-organizational ties. In my earlier work I demonstrate a strong effect of inter-organizational ties in predicting similarity of preferences between interest groups sharing a formal organizational link (Bunea 2014). In light of this, the consultations on CO<sub>2</sub> emissions and the MRV case describe an interest intermediation system characterized by well mobilized, disciplined, concentrated lobbying efforts on behalf of those sectoral interests incurring the costs of the proposed regulatory measures.

A similar pattern of low levels of preference diversity within interest type is displayed by organizations representing the interests of producers of electric and electronic equipment in the WEEE consultation. These organizations expressed very similar policy preferences with respect to policy alternatives on the management of electric and electronic waste, as their aim was to reduce the number of measures that would impose extra constraints on the producers of electric and electronic products. The homogeneity of expressed policy preferences corresponds to a disciplined, concentrated lobbying coalition of interest organizations, closely linked by inter-organizational ties.

Environmental NGOs display a mixed pattern of expressed preferences.<sup>7</sup> They show a disciplined and homogenous lobbying in the case of the CO<sub>2</sub> emissions of passenger cars (expressing different preferences on two policy issues only), but a moderate diversity of

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<sup>7</sup> Only one environmental NGO participated in the consultation on the monitoring and verification mechanisms for introducing aviation activities in the ETS and expressed a policy preference on only 2 out of the 51 issues discussed in the consultation. Similarly, only 3 environment NGOs participated in the consultation on the electric and electronic waste. These are not taken into account in the analysis because they articulated preferences on less than three policy issues.

preferences articulated in the consultations on the adoption of a waste framework directive and the inclusion of aviation activities in the ETS.

In line with the values of the policy issue diversity index, the interest type diversity index also shows a pattern of low to moderate levels of plurality. A first interpretation of these results is that there are potential corporatist features characterizing the system, with business groups displaying low to moderate levels of diversity of preferences if they are part of the economic sector that incurs most of the costs emerging from the proposed regulatory measures. This finding provides empirical support for the classic Olsonian argument that, in order to protect their economic stakes, “specific interests” are better able to overcome collective action problems and are better able to speak with one voice on issues of primary interest to them (Olson 1965). This is also supported by the identified patterns of inter-organizational ties linking stakeholders in the policy community, which indicate the presence of strategic, coordinated lobbying actions on behalf of organizations representing business interests (see Bunea 2014). This shows that the identified homogeneity of interests follows from interest groups’ decision to lobby the Commission by speaking with a coherent, unified voice when representing their sectoral interests.

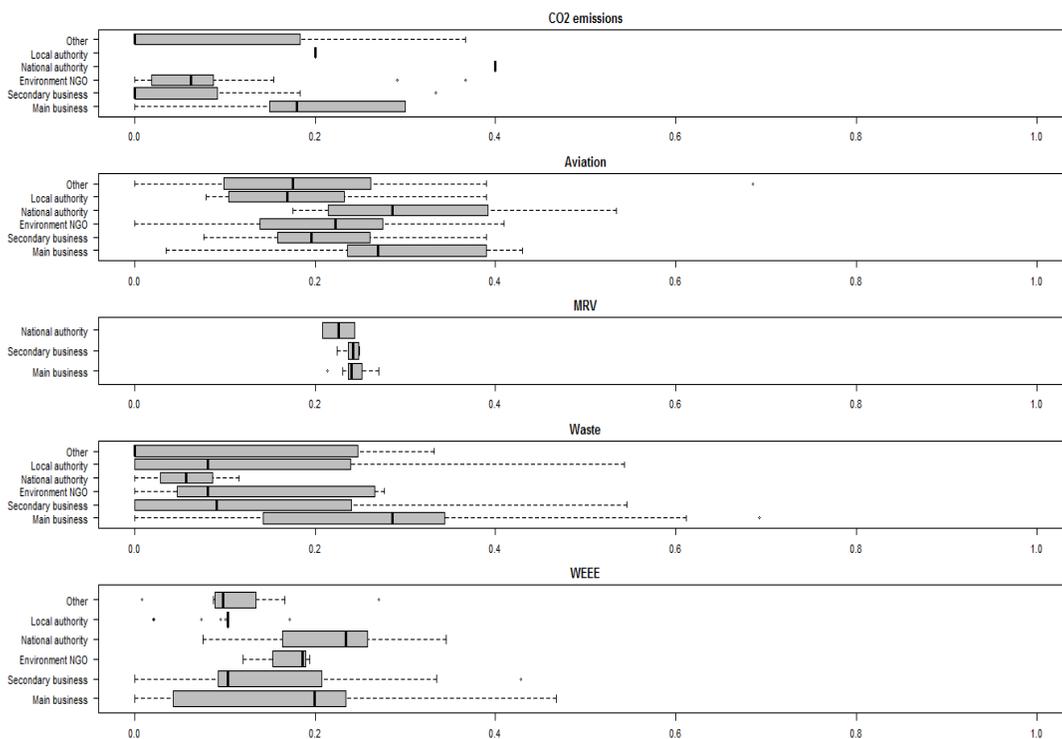
However, the observed levels of diversity of preferences within same interest type might also be a consequence of the fact that the environmental policy area is predominantly characterized by regulatory measures that “generally entail concentrated benefits for one and concentrated costs for another group” (Dür 2008a: 1217). In line with Wilson’s theory of regulatory politics and interest group behaviour (1980), regulatory regimes with narrow concentrations of costs and benefits in different sectors of society are associated with high levels of interest group mobilization and the creation of well-defined and articulated lobbying sides (Wilson 1980: 368-369).

Instead of being the mark of a corporatist system, the observed homogeneity of policy preferences within interest group type could instead be interpreted an indication of a well institutionalized interest groups system in which organizations pursue clear lobbying agendas and act strategically in response to the specificities of the policy environment, in an attempt to maximize their payoffs during the policymaking process. This view is consistent with what Wilson (1980) identified as a system characterized by *interest groups politics* which, according to his theory, is expected to produce inclusive decision-making outcomes, reflecting the interests

and policy propositions of large and different parts of the stakeholders' community. I address this issue in the next subsection and I take the analysis one step further by examining the levels of policy preferences achieved by different interest organizations across the analyzed consultations.

### 4.3 Interest groups and preference attainment

The last index proposed is that of interest groups *preference attainment*, a weighted measure of the preferences each organization translated into policy outcomes. The index estimates interest groups' policy influence and allows us to examine patterns of potential bias. Figure 5 presents the aggregate values of weighted preference attainment scores for interest organizations by type of interest represented.



**Figure 5: Weighted preference attainment scores per consultation and advocate type**

The results indicate that, on average, main business interest groups tend to achieve higher levels of preference attainment than other advocate types. This varies however across cases.

Table 3 shows that their levels of preference attainment are in most cases significantly higher than that of groups representing other interests. The table gives the values of the t-statistics and of the corresponding Bonferoni adjusted p-values for a series of paired comparisons.

**Table 3: T-test values and Bonferoni adjusted p-value for paired comparisons of preference attainment scores by advocate type**

	CO <sub>2</sub> emissions	Aviation	MRV	Waste	WEEE
Main business vs. Environmental NGOs	2.8***	3.41**	n/a	2.14	0.12
Secondary business vs. Environmental NGOs	-0.23	0.23	n/a	0.20	-0.64
Main vs. Secondary business	2.12*	2.86*	0.61	3.18**	0.89
Main business vs. National authorities	n/a	-0.61	n/a	5.28*	-1.43
Secondary business vs. National authorities	n/a	-2.35	n/a	1.99	-2.25
Main business vs. Local authorities	n/a	3.31**	n/a	3.34**	3.76***
Secondary business vs. Local authorities	n/a	0.80	n/a	0.41	3.19**

\*The difference between groups is statistically significant at  $p < 0.1$ .

\*\*The difference between groups is statistically significant at  $p < 0.05$ .

\*\*\*The difference between groups is statistically significant at  $p < 0.01$ .

The results indicate that main business interest groups display significantly higher preference attainment scores relative to other advocate types participating in the events. In two of the four consultations for which observations were available on the preference attainment scores for environmental NGOs, business preferences were more likely to be translated into policy outcomes than preferences expressed by environmentalists. Similarly, in three of the five consultations, organizations representing main business were more successful in achieving their preferences than organizations representing secondary business. Relative to national authorities participating in the consultations, main business interests were more successful only in the consultation for the formulation of a waste framework directive. Main business organizations were of more consequence for policy outcomes than organizations representing local authorities in all three cases where local authorities participated as stakeholders.

By comparison, organizations representing secondary business do not show on average significantly higher preference attainment scores relative to environmental NGOs and national authorities. Only in the consultation on the revision of the WEEE directive, were secondary

business organizations significantly more successful than local authorities in translating preferences into outcomes.

Within cases, we can observe that in three out of five consultations, main business interests were in a clearly better position to affect policy outcomes than other interest groups. These findings are in line with those contributions to the literature claiming that EU policymaking is disproportionately influenced by business interest groups to the detriment of other societal or sectoral interests (Chari and Kritzinger 2006; Beyers 2004; Greenwood 2007b; Kohler-Koch 1997; Pollack 1997). Most of these contributions drew their conclusions on case studies and process tracing, focusing their analysis usually on a relatively narrow number of interest groups. The number of policy issues based on which lobby success was analyzed was also usually low. Business interest groups were, most of the time, assumed to be homogenous, thus not making a clear and necessary distinction between groups having direct and primary interests in a decision-making event and organizations having only secondary policy stakes. As shown by the consultation on the reduction of CO<sub>2</sub> emissions, this distinction is important as within the same decision-making event some business groups achieve their preferences while others do not. These findings support the existing literature but they do so in a more systematic, empirically grounded manner and use more fine-grained measures of interest groups' preferences than is currently available in the literature.

## **CONCLUSIONS**

This study addressed an important theoretical debate in the literature on EU interest groups on what is the most appropriate label for describing the EU interest intermediation system. In answering this question, it suggested an alternative, new approach to evaluating plurality in the community of stakeholders participating in EU environmental consultations. This approach consisted of two key elements: first, an evaluation of the system of interest representation by examining issue and preference data; and second, the formulation and application of a set of indexes capturing the plurality of policy alternatives advocated on each issue, the plurality of preferences within the community of organizations representing the same interests and finally a measure of success of different interests in achieving their preferences. In addition, a concise evaluation of the interest group communities articulated around the considered consultations was conducted by describing the aggregate distribution of interests

across and within consultations, as well as the aggregate distribution of organizational characteristics.

The findings provide support for the *constrained pluralist* view, showing a moderate diversity of preferences articulated on policy issues, low to moderate heterogeneity of demands articulated by groups representing the same type of interest, and a clear pattern of higher levels of preference attainment on behalf of main business organizations. The examination of the aggregate distribution of interests represented in the consultations provided further empirical support for the constrained pluralist description of the EU interest intermediation system in that it indicated higher levels of organizational mobilization and participation in the consultations on behalf of main business.

Several implications follow from these findings. First, despite the overall moderate levels of diversity of preferences expressed across policy issues, the research found a rather high within case variation of diversity of preferences articulated per policy issue. In doing this, the research provides empirical support to those scholars who previously emphasized the importance of issue level characteristics, including the level of contentiousness of policy alternatives (Dür 2008a; Mahoney 2008; Lowery and Gray 2004). This study makes a contribution to the existing literature by suggesting the policy issue diversity index as an elegant and reliable measure of levels of policy issue contentiousness. However, this proposed index for measuring plurality leaves one important aspect to be addressed by further research and debate: what values of the index are appropriate thresholds for distinguishing low, moderate and high levels of pluralism within the system? In addition, what factors encourage interest organizations to articulate policy preferences on different policy issues, thereby increasing the diversity of voices heard on one particular issue? Despite its high theoretical relevance, this question has not been currently addressed in the literature in a systematic manner (Warntjen and Wonka 2004: 16).

Also, future research should aim to rank the identified policy preferences on a policy scale. A metric ordinal scale should be used instead of a nominal one, in order to estimate interest groups' policy preferences. This step would provide an even more refined measure of diversity characterizing policy issues at EU level, as well as an alternative estimation of preference attainment by using the policy distance between outcome and policy preference as a more precise indicator. Expert interviews and discussions with European Commission desk officers, in-charge of the considered *dossiers*, would be particularly helpful in an attempt to

understand the technical EU policy issues and decision-making processes, and rate preferences on a policy continuum.

Some interests displayed a pattern of disciplined lobbying, such as the car manufacturing industry and the aviation industry. One argument made in this study was that the presence of a concentrated lobby on behalf of certain sectors could be interpreted as an indicator of a mature and institutionalized interest intermediation system, where private actors representing similar interests coordinate well and cooperate with each other to achieve common policy goals. However, this pattern could also be the indicator of underlying corporatist features of the system that prevent cross-sectoral policy alignments from occurring, thus increasing the chances for a monopoly on decision making to emerge on behalf of those interests that are better able to coordinate their policy preferences and lobbying efforts. With the help of the proposed index, but focusing on a larger and more diverse sample of decision-making points and events from different policy areas, future research should investigate whether this pattern holds across policymaking stages and policy arenas, observing whether some interests display a systematic pattern of disciplined lobbying within the EU policymaking system, irrespective of policymaking circumstances. Extending the analysis to other policy areas where decisions are being made also on distributive and redistributive policy issues, future research would be able to identify whether the observed concentration of policy preferences, which inevitably speaks of a limited plurality of the system, is something specific to the regulatory nature of the EU environmental policy.

Finally, this study proposed a measure of interest groups' preference attainment and used this as an instrument to identify the levels of potential bias in the interest group system. The findings describe an interest group system and policymaking process favouring business interests over all others. Their preferences were found to be consistently more likely to be translated into outcomes. A research question to be addressed by future research is thus the following: what factors explain this variation in levels of preference attainment across different advocate types?

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