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Parliamentary Procedures & Interest Group
Mobilization: Evidence from the European Parliament's
Committees

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Abstract

This paper contributes to discussions surrounding interest group representation in the European Parliament (EP). Different types of procedures effect committees' demands for legitimacy, impacting the balance of private and public interests. We inspect a population of 10,000 accredited lobbyists, and the entire procedural output across the 7th legislature's (2009-2014) committees. The results indicate that committees with a higher ratio of Ordinary Legislative Procedures to Own Initiative Reports see greater numbers of private interests involved. However, in committees where the procedures' ratios are inverse we observe greater numbers of public interests involved. While this may overturn the premise of business dominance across the Institution. It has implications regarding the balanced representation of public and private interests on a procedural level. The paper offers a novel approach for framing the nature of the committee, whilst bridging discussions on interest group representation and the democratic deficit.

Keywords

Legitimacy; democratic deficit; interest groups; European Parliament.

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Introduction

Studies on interest group mobilization offer key insights into policymaking by mirroring institutions' locus of activity, power and bias (see Richardson 2015). To comprehend the nature of the European Parliament's (EP) growing authority and the role of its committees in the policy process, it is important that we examine the diversity of interest mobilization in this black box. Significantly, we need to take account of the delegation of powers since the Lisbon Treaty, and the creeping competencies that go beyond legislative procedures (Héritier & Reh 2012). We argue that the mix of procedures that committees engage in shapes their authority and their corresponding demands for legitimacy, impacting the types of interest groups that mobilize around them. We accept that a group's organizational structure, and its public or private character, determines the legitimacy (input or output) that it carries to the decision-making process.

Under procedures where the EP has (co-) legislating power it takes on a scrutinizing role, amending Commission initiatives often associated with the regulation and integration of the common market. Consequently, the parliament's authority rests on the legitimacy of its output, linked to the effectiveness of the legislation rather than the inclusiveness of the process. This pushes the EP to consult with greater numbers of private interests as it governs 'for the people'.

By contrast, under procedures where it has the political initiative the parliament tries to be responsive to the demands of its constituency by raising popular issues on the EU's agenda. In this case, its authority becomes dependent on its input legitimacy, as the EP aspires to govern 'with the people' – swelling the presence of public interest groups (see Bellamy 2010; Schaprf 1998; Schmidt 2004). Therefore, the mobilization of private and public interests in each committee follows the balance of its legislative and political procedures.

This paper contributes to the literature in three ways. First, it examines the diversity of interest group mobilization across the EP's committees, introducing a unique snapshot of a population of 10,000 accredited lobbyists, altering notions of systemic business dominance. Second, following an analysis of the 7th legislature's procedures, it uncovers a significant body of parliamentary initiatives that expand the EP's role beyond legislating. Finally, it offers an innovative use of conceptualizations of legitimacy for modelling interest group diversity across sub-systems.

Hurdles in Conceptualizing Interest Group Diversity

In an ever-more integrated EU polity, the various decision-making functions cut across interconnected institutional structures, tangling the various actors and resources mobilized. As a result, traditional conceptual vehicles face limitations in explaining interest group diversity within sub-systems (Marks & Hooghe 2009) – thought of as policy fields, committees or Directorate Generals.

On the one hand, a single committee can take on seemingly contrasting traits, such as economic and democratic (Bouwen 2004; Crombez 2002), regulatory and distributive or technical and political (Broscheid & Coen 2007). This dynamic restricts the validity of modelling interest group diversity within sub-systems by assigning specific issue-traits: each of these traits, taken on by a committee, will attract a different community of interest groups. On the other hand, the evolving strategic behaviour of interest groups reduces the validity of attributing information or expertise monopolies to types of groups. The links that tie NGOs to political expertise and business to technical expertise are fading (Coen & Katsaitis 2015 p.65), challenging a standard practice of modelling sub-system interest group diversity based on the information-expertise streams passing through them.

Moreover, work on interest group mobilization within the EP specifically has expanded over the past 10 years, moving down to the committee level; yet it is still focussed on legislative procedures. This oversimplifies the function of the parliament, which utilizes various procedures across its committees which in turn impact its institutional behaviour (Naurin & Rasmussen 2011). Thus, the above mentioned conceptual limitations continue to be implemented on a fraction of the procedures employed by the parliament's decision makers, bounding our understanding of committees' policymaking activity and its reflection on the mobilization of lobbying.

Mechanisms seeking to frame the nature of the sub-system (or committee) and its impact on interest group diversity, could alternatively concentrate on the distinct building blocks that construct it, hitting two birds with one stone. Procedures are legal or constitutional expressions of institutional competences; well-defined tools serving diverse functions that ultimately can be translated into forms of authority. While the impact of authority on interest group diversity has been modelled through conceptualizations of legitimacy at the institutional level; it remains to be applied at the sub-system level. Aiming to sort interest group diversity across the EP's committees, we argue that their procedural output offers an elegant framing device. Moving towards this direction would broaden our understanding of interest group diversity with respect to a richer spectrum of the EP's functions. In the next section, we describe how legitimacy can model variations of authority across procedures, discuss their effect on the nature of committees and explore how this impacts interest group diversity.

Legitimacy, Interest Group Diversity & EP Procedures

Drawing from legitimacy theory, institutional authority can stem from input or output legitimacy, depending on the form of authority delegated. Institutional actors demand and instigate the mobilization of interest groups to access the legitimacy they carry, as a way of retaining their authority (Schmidt 2004). Interest groups carry legitimacy that is input or output oriented, connected to their organizational structure. They aim to represent their members by mobilizing to monitor and influence policy, transferring their legitimacy through different informational channels, such as the formal or informal approval of amendments or the direct supply of expertise or opinions.

Input legitimacy is defined as the acknowledgement of authority in the context of the breadth of the decision-making process and its responsiveness to the beliefs and debates of a community (Zürn et al. 2012); it is rooted in notions of governing *with the people*. Under input dependent systems, “*decisions should originate from the authentic expression of the preferences of the constituency*” (Scharpf 1998 p.2). These systems have strong democratic credentials and work better for decision-making systems with a broad implementation; for example, parliamentary elections.

Output legitimacy is defined as the acknowledgement of the quality of a decision made or output produced in the context of the technical standards of a community (Bellamy 2010); it is rooted in notions of governing *for the people* (see Schmidt 2004). Collectively binding decisions should serve the common interest of the constituency. “*...the powers of government can be employed to deal with those problems that the members of the collectivity cannot solve either individually, or through market interactions, or through voluntary cooperation.*” (Scharpf 1998 p3). Thus, output legitimacy is of higher relevance in decision-making systems entrusted with scrutinising decisions or upholding standards, for example the European Court of Justice.

Public interest groups such as civil society organizations (CSOs) represent grassroots movements and interests that are part of the public domain, incentivized by public support expressed through registered members. Acting as norm entrepreneurs that by default politicize the subject of their lobbying, they are guided by the breadth and participatory character of the decision-making process and therefore the legitimacy they carry is *input* oriented. By contrast, private groups such as businesses or trade associations represent owners and shareholders. They are incentivized by results reflected in maximizing profit, or in increasing market share, and are guided by the standards of the decision rather than the inclusiveness of the process; the legitimacy they carry is *output* oriented¹.

We argue that the EP operates with a different authority setting, under different procedures, that influences the prominence of different types of legitimacy within its committees. This ultimately affects the diversity of the mobilized population². We focus on two distinct procedures that cover approximately 70% of the total output of the 7th legislature.

¹ We note that this dichotomy is not exclusionary. As some NGOs may also be associated with output legitimacy and vice-versa for business interests.

² We reiterate that this paper is looking at diversity of mobilization and not diversity of influence.

OLP, Output Legitimacy & Private Interest Groups

Files under the ordinary legislative procedure (OLP) are the only case where the EP acts on equal terms with the Council of the EU on initiatives of the Commission. Under such legislative initiatives, the Commission is charged with producing proposals independently limiting its need for input legitimacy. The relevance of its authority is linked to the quality of the policy output, rather than the inclusiveness of beliefs and ideas in the decision-making process (Neyer 2010; Majone 2002). Similarly, while the Council consists of national governments' ministers, hence it also produces its resolutions behind closed doors, associating the relevance of its authority with the legitimacy of the legislative product (Heisenberg 2005). For both institutions, the authority they are delegated under OLP is one in which they govern *for the people*.

As the only EU institution held directly accountable via elections, the EP must influence legislative outcomes in ways that represent and respond to the ideas and beliefs of its constituents to prove its relevance to the electorate. However, under OLP the parliament finds itself with an oversight role that limits the value of input legitimacy. To achieve influence, amendments must speak the language of the Commission and the Council to be considered in the decision-making process (Reh et al. 2013; Burns et al. 2013). Amendments that harm the quality of the output, or in any way delay the legislative process, can lead to the Commission and Council side-lining the parliament in future legislative initiatives by utilizing other procedures. Therefore, the EP takes care when framing its amendments and argumentation to focus on their output legitimacy, and this has the effect of instigating the mobilization of private interests rather than expanding the involvement of public interests.

Committee meetings that take place before trilogues exacerbate this effect. MEPs are handed unique powers of representation as they try to modify proposals through amendments, point by point, focusing on the legislative output, rather than inclusiveness, which could stall the process or lead to a legislative gridlock (see Benedetto 2005; Crombez & Hix 2015). In the 7th legislature, 80% of all OLP files were passed at first reading or early second reading, suggesting a high degree of informal agreement between the three institutions before formal discussion of the legislative proposal within the relevant EP committee (Burns et al. 2013).

Therefore, for files under OLP the EP's authority is associated with governing *for the people*, making input legitimacy less valuable in comparison to output legitimacy. As such, output legitimacy oriented private interests are incentivized to mobilize more than input oriented public groups. Under OLP procedures there should be a greater mobilization of business interests than public interests.

INI, Input Legitimacy & Public Interest Groups

Own Initiative Reports (INI) fall under the category of resolutions & initiatives procedures. Files under this procedure permit the EP's committees to produce a resolution that addresses a specific issue and proposes solutions on their own initiative. Similar to a legislative file, the report is written by a *rapporteur*, debated, amended and voted at the committee level, and afterwards sent for confirmation at the plenary. Once adopted an INI is a formal resolution produced solely by the EP, but it does not have a binding character for EU policy. Moreover, INIs can address smaller constituencies than the Commission's, as MEPs aim to show to their electorate that they represent their interests. The value of the initiative rests in the accurate representation and inclusiveness of beliefs, norms and issues addressed. Under INIs the EP operates within a frame of *governing with the people*.

Thus, INIs serve as a tool for MEPs and political groups, through which they can politicize issues that affect their constituencies and attempt to place them on the EU agenda (see Zürn 2016 for a conceptual discussion on politicization). Conversely, MEPs can divert a public backlash and political costs from unpopular areas of EU policy towards other institutions by producing INIs, as counter-resolutions to wash their hands clean in the eyes of (at least sections of) the electorate³. Significantly, INIs do not need to be adopted but can be used to make an argument that benefits MEPs or parties. While vetoing a legislative proposal may be considered an institutional failure, and may entail inter-

³ For example reports on austerity measures conducted under INIs.

institutional retribution, INIs do not carry such harsh punishment for the committee which tabled them.

At the same time, the EP discreetly attempts to override the Commission's monopoly of legislative initiative by capitalizing on publicly salient and highly politicized issues that offer an opportunity for legislative action, by moving them on to the EU level. Inviting already mobilized public interests within the EP's institutional setting adds to the legitimacy of such moves. Through reports in areas such as EU transparency, funding for regional projects or genetically modified foods, the EP can signal to its institutional counterparts (the Commission in particular) potential areas of legislative activity without openly contesting them or risking direct rejection⁴.

INIs give the EP a distinct political function, highlighting its input oriented decision-making nature. MEPs aim to produce resolutions that express as much as possible the original demands of their constituency. Therefore, under INIs the relevance of input legitimacy is higher than output legitimacy, which leads to a greater mobilization of public interests. In the following section, we provide the hypotheses that frame our argumentation, and the methodology for examining them.

Hypotheses, Methodology & Data Collection

Any EP committee can function under a different type of authority depending on the procedure it engages with, resulting in the relevance of different types of legitimacy to different circumstances. Because interest groups' organizational structure affects the legitimacy they carry, the types of group mobilizing across committees are a result of the mix of the committees' procedural output. If a committee engages in more OLP procedures than INI, then there should be a greater mobilization of private over public interests. Conversely, if a committee engages in more INI than OLP procedures, then there should be a greater mobilization of public over private interests.

H1: If a committee utilizes more OLP than INI files we will observe greater mobilization of business interests over public interests. .

H2: If a committee utilizes more INI than OLP files we will observe a greater mobilization of public interests over business interests. .

Our theoretical framework attempts to model overall patterns of behaviour across committees of the EP. We have therefore taken a quantitative approach that aims to test the validity of our argumentation while offering reliable replications. To test our hypotheses we gathered secondary data on procedures and interest group mobilization, across the committees of the EP's 7th legislature. Interest groups that aim to mobilize within the EP on a permanent basis apply for an accreditation that allows them to enter the institution at opening time without having to register at reception. Accreditations are valid for one year and apply to specific individuals per interest group; that is, they are non-transferable. Interest groups are classified under one of six categories: professional consultancies / law firms / self-employed consultants; companies' in-house lobbyists and trade / professional associations; non-governmental organisations; organisations representing churches and religious communities; organisations representing local, regional and municipal authorities, other public or mixed entities, *etc.*; think tanks, research and academic institutions.

We focus on accredited individuals for two reasons. First, through accreditations we can safely infer at least a minimum of mobilization in the EP: accredited individuals are definitely interested in conducting lobbying activity and mobilize *within* the EP by applying for the permit. Second, accredited individuals are required to specify upon registration the committees of interest, they aim to lobby. The data was collected as part of a broader research project on interest groups and covers the entire population of accreditations from mid-2012 to mid-2014, approximately 10,000 lobbyists, and provides information on their committees of interest and the type of interest group they belong to. This variable better operationalizes interest mobilization across committees, as a specific group may place more than one accredited individual per committee. Conversely, the same accredited individuals may operate on more than one committee. As such, the quality and quantity of mobilization per type of organization is well captured. The population of lobbyists provided a total of

⁴ The EP can also use Legislative Initiative (INL) to invite the Commission to submit a proposal, however this is a much rarer case and the Commission is not obliged to fulfil this request.

24,225 indications of committee interest, approximately 2.4 committees per lobbyist. This allows us to observe the extent of lobbying mobilization per type of organisation across the 20 committees of the 7th legislature (2009-2014).

Operationalizing the types of interests, we utilize categories of groups that are easy to classify clearly, either in the private or public area of interests. For private interests (such as companies and trade or economic associations) we utilize data on those categories as ‘in-house lobbyists’; while for public interests we utilize data on NGO groups (or civil society organisations) and regional and local authorities. We are confident of the sample we focus on for our analysis, which represents approximately 78% (18,919) of all data points of committee interest of our population. We excluded from our analysis the remaining categories as their role is harder to classify, and they also represent a considerably smaller percentage of the interest group population. We note that professional consultancies – the 3rd largest group of accredited individuals (18% of all data points) within the EP – are hired professionals that act as mediators for their clients. However, less is known about who precisely they work for on a per file basis. As such we cannot validly assign them to either the private or public area, as their legitimacy is tied to the client they represent per case.⁵

We collected information on the procedural output per committee of the EP using its online archive. Out of a total of 19 different procedures that fall under 5 different categories, we excluded the category of internal organization procedures, which are not relevant to our analysis, as the EP utilizes them for internal communication (they are very few). We created a data set with the entire output per committee across the remaining 16 procedures that fell under 4 categories: legislative, non-legislative, budgetary and discharge, and resolutions & initiatives. We then proceeded to exclude types of procedures that contained no files or very few files, leaving us with 9 types of procedures (12,081 files / data points)⁶. Our analysis focuses on files under INI and OLP that cover nearly 70% (8,348) of the total output of committees.

We do not address other legislative files because OLP is the only procedure that gives the EP the ability to scrutinize legislation, co-legislating along with the Council of the EU with the nuclear option of vetoing policy. Other types of legislative procedures (e.g. Consultation Procedure, CNS) give the EP a consulting role with an ability to somewhat delay procedures. We do not address budgetary and discharge procedures, which between them cover 17% of the total procedures. Two committees engage with the majority of these specific procedures, the Budget Committee and the Budgetary Control Committee, and they receive little interest group mobilization because of their limited power to impact budgets that are created by the Commission and the Court of Auditors. Finally, we recognize that in an ideal case there would be information linking explicitly specific interests mobilized per file-procedure, however such information is unavailable in the EU, and in most interest group data bases around the world (OECD 2014). Nevertheless, as this paper identifies and theoretically frames overall patterns of behaviour based on the procedural mix of the committee, future case-study work can clarify its mechanisms, leading to a better understanding of how different functions of authority per file-procedure impact interest group diversity. We provide a detailed table with all our data in the appendix. In the next section, we present our results and analysis.

Results & Analysis

To examine the relationship between the variables, we utilize a Pearson’s product-moment correlation. This gives us a measure of the strength between the procedures examined (OLP and INI), and the types of interest groups (public and private), allowing us to test the hypotheses. The results lend support to the theoretical argument: OLP files have a much stronger correlation with private than with public groups. Conversely, INI files show a stronger correlation with public rather than with private groups, that is statistically significant. We observe with smaller statistical significance but at reasonable levels, that public interests show a weaker correlation to OLP files while private groups

⁵ We note that future work on EU lobbying and mobilization could benefit considerably by an empirical analysis untangling the role this specific category of lobbyists play in EU policymaking.

⁶ For a detailed descriptive breakdown of files per procedure and interest groups mobilized across committees please refer to Coen & Katsaitis 2015.

also show a correlation with INI files. This is not surprising: files are multi-faceted, which may lead to the mobilization of other types of groups as well but at a much smaller rate. After all, MEPs have private interests, as part of their constituencies, which they need to represent, justifying their mobilization in INIs; older and highly professionalized NGOs that have achieved insider status may be invited to participate in OLP negotiations. Similarly, we also note the correlation between private and public interest groups. This can be explained as a result of issue overlap; public and private interest groups may mobilize under common themes within committees as they offer different forms of legitimacy for a common issue i.e. environmental protection. The overall patterns of behaviour that this paper seeks to identify fit within the theoretical and empirical frame set.

Table 1: Correlations Coefficients

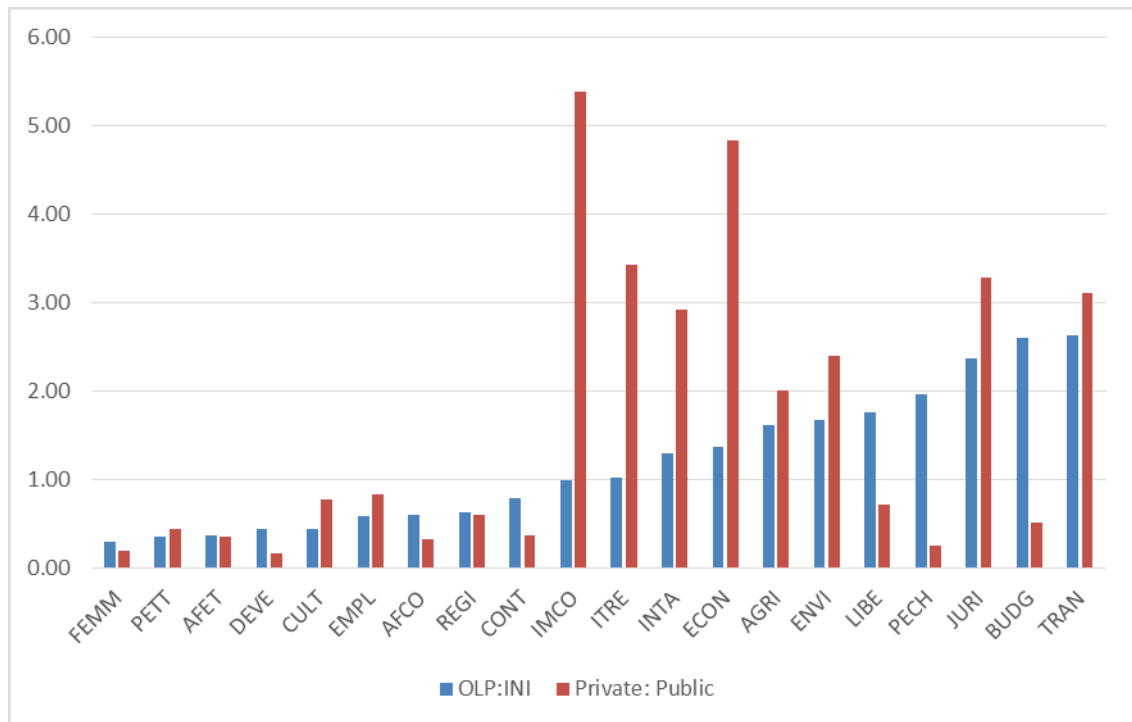
	OLP	INI	PRIVATE	PUBLIC
OLP	1	.292 (.212)	.680 (.001)	.396 (.084)
INI	.292 (.212)	1	.427 (.060)	.704 (.001)
PRIVATE	.680 (.001)	.427 (.060)	1	.590 (.006)
PUBLIC	.396 (.084)	.704 (.001)	.590 (.006)	1

*p values in parentheses N=20

Based on the above and following from the premises of the argument, the diversity of the population across committees is a result their procedural output-mix. Thus, if our conceptualization holds when the number of OLP files in relation to INI files is greater, the number of private interests will be greater than public interests. Conversely, if the number of INI files in relation to OLP files is greater, then the number of public interests will be greater than private interests. Put more simply, we can also think of this relationship in terms of ratios: if the ratio of OLP to INI files is greater, then the ratio of private interests to public interests will be greater, and vice versa. We plotted the results from smallest procedural ratio to largest (Figure 1). It should be noted that the ratios do not mean that committees are necessarily densely populated or that they have greater procedural output; they give a quantification of the relative relationship between the procedural activity and interest group activity.

We observe a division between committees that have greater relative INI procedural output (where $OLP/INI < 1$) public interests are mobilized in greater numbers than private interests. Meanwhile in committees that have greater relative OLP output (where $OLP/INI \geq 1$), we observe a greater mobilization of private interests. As MEPs aim to politicize resolutions or address politicized issues through INIs they demand input legitimacy supplied primarily by public interests. This confirms that a formal role for public interests in the EP exists and that it is also dominant within specific committees (Rasmussen M. 2016). Nevertheless, as the balance of the procedural ratio shifts from INI towards OLP files and output legitimacy becomes more relevant, private interests mobilize and their dominance over public interests is considerably greater. This can be explained by resource-mobilization arguments, as business groups are better equipped to mobilize with more financial and staff resources; when they are incentivized to mobilize they do so in great numbers. This seems only to intensify the effect of the procedural function, and the overall effect observed is that OLP files create an environment that sees public interest mobilization overshadowed by private interests. Substantively, these results raise normative questions surrounding the parliament's limited comparative initiative in these committees and the balance of public interest representation in the policy process within them, which we address in the following section.

Figure 1: Comparison between procedural (OLP: INI) and interest group mobilization (Private: Public Interests), across committees.



The exceptions across the population of 20 committees are LIBE (Civil Liberties Justice & Home Affairs), and PECH (Fisheries) and BUDG (Budgetary). LIBE is the only of the three committees that has a substantial capacity to impact interests across the EU, and is renowned for representing diffuse interests on highly politicized subjects, such as surveillance and online data protection. Thus, LIBE might be experiencing the focus of diffuse interests across the board, which perceive it as an access committee into the policymaking process – surpassing the mobilization of private interests. The Budgetary and Fisheries committees are both particular cases because they offer little in terms of EU wide policy impact. BUDG confirms budgets prepared by the Commission and the Court of Auditors with only a small capacity to impact them, and largely produces a specific type of output under budgetary and discharge procedures, rather than OLP files. Similarly, PECH sets fishing quotas discussed between the Commission and Council but not all member states are directly interested. Their limited impact on policy in terms of implementation and constituency size reduces their need for output legitimacy to remain relevant, artificially increasing the demand for input legitimacy and public interest mobilization. Overall, the results confirm that interest group diversity observed across committees is driven by the mix of external and internal procedural initiatives that vary in terms of the authority. In the next section, we discuss the implications of these results.

Implications

This paper identifies a distinct link between specific types of interest group and procedures, noting a two-fold mobilization bias at play. Private interests dominate in committees that engage in more legislative procedures, and public interests are more active in committees that engage in more political procedures. One central issue that derives from this is that while parliaments often exercise a useful scrutiny function it can only be effective if they can draw on different sources of expertise compared to the executive. That is to say, if both the EP and the Commission are listening to the same people, then how can the parliament exercise control? This highlights that the risk of institutional capture by private interests cannot be contained within the Commission but is likely to spill over to the parliament. Moreover, if we assume that a balanced distribution of private and public groups, input and output legitimacy, is necessary to better weigh the overall quality of policy, private interests are

advantaged over public interests because of the legislative nature of the procedures where their mobilization is greater; the bigger the difference between the ratios of groups the greater the imbalance. This underscores an issue with the legislative supremacy of the Commission and the EP's limitations in impacting policy proposals. The parliament gets to scrutinize and impact the legislative file under a similar authority / legitimacy setting; this leaves public interest mobilization for cases of a red flag in a specific designated committee (LIBE).

This paper quantifies representation-accountability issues identified under OLP (Andlovic & Lehman 2013; see also Mazey & Richardson 2015), in terms of public versus private interest mobilization. Because the EP is a consensual parliament that represents a broad European electorate with multiple small constituencies, its committees attempt to balance their work with input considerations. However, this needs to be done by closing the gap between forms of governing within procedures, primarily in OLP files where governing *for* the people is overemphasized. Attempting to close the gap between private and public interest mobilization artificially through INIs cannot resolve issues of limited public engagement in legislative procedures. The lack of politicization of the legislative process through public interest mobilization remains. Therefore, from a normative perspective, one of the questions that arises is whether the parliament should attempt actively to instigate the mobilization of public interests where it is limited, or comparatively speaking let private interests dominate? As a directly elected institution, charged with bringing citizens closer to the policymaking process, not actively doing so may ultimately place its own legitimacy and relevance in question – and risks the legitimacy of the entire system (see Kochler-Koch 2010; Eriksen & Fossum 2011). A potential additional solution to this issue would be to expand the EP's capacity to conduct independent research through its research service in order to limit its need for information-expertise from interest groups. While the relatively new EPRS has been added to its abilities, along with the policy department and the impact assessment unit, the EP is far from the size of the US Congressional research service.

Procedural initiative has an impact on lobbyists within the EP and it may have an impact on other institutions as well. While we have researched how the Commission's legislative initiatives impact lobbying mobilization in the EP we know little of its potential effect in the opposite direction. As the EP impacts policy under inter-institutional negotiations (Farrell & Héritier 2007; Häge & Kaeding 2007; Häge 2011) one can argue that the EP may also lead to the mobilization of interests in other EU institutions through its own initiatives. Significantly, INIs may offer a channel for input legitimacy for the entire EU system, guiding public interest mobilization across the board and overriding the need for a Council with boosted powers (Scharpf 2009). Nevertheless, we know little about the role of INIs in signalling, or their potential impact on the Commission's agenda and the extent to which other EU institutions welcome this activity (see Naurin & Rasmussen 2011 as an exception). Furthermore, we know even less about their cross-institutional impact on interest group mobilization. As such, we identify INIs as an understudied area which restricts our understanding of interest group mobilization across the EU system and its cross-institutional interactions. Future work in this area can enlighten the multi-faceted relationship between institutional interactions and orbiting interests.

The results confirm the existence of a diffuse population of interests (Lehman 2009). However, proponents of EU pluralism(s) should consider that the mosaic of the population is largely covered by two types of groups; business (companies and associations), and NGOs / CSOs. Significantly, the same committee can engage in different functions of authority, which impact the mobilization of different interest groups within it. Within this environment, conceptual vehicles need to be able to pinpoint drivers of diversity at finer levels of analysis. We find that legitimacy frames, whilst operating within a conceptually macro-sphere, almost counter-intuitively, achieve this goal. Substantively, they enable us to translate legal-procedural functions into forms of authority. By so doing, this paper implements post-modern conceptualizations on a sub-systemic level; we call on future research to test its potential cross-institutional value. On a smaller note, we seem to know surprisingly little about the activity of the 3d largest group of interests in the EU, professional consultancies. While some work has engaged in examining the biggest clients, future research that examines their activity on a per file basis can offer valuable insight into the EU lobbying universe.

While this paper addresses interest group diversity with respect to different procedures of the EP the principle may apply to other congresses and institutions beyond the EU. As such, a substantial body of work has offered significant results in terms of interest group mobilization within institutions with respect to legislative activity (Gray et al. 2005; Baumgartner et al. 2009, 2011). The results suggest that there is space for further exploration within institutions in terms of procedural variation, which could yield interesting results beyond the traditional norms of mobilization-follows-legislation. However, this requires that we examine institutional functions beyond the strictly legislative procedures of policymaking.

Conclusions

In this paper, we aimed to assess the diversity of interest group mobilization within the EP's committees. We have identified a clear link between specific procedures and interest group types. The EP requires output legitimacy for files under OLP as it scrutinises the policy proposals of the Commission whose legislative zeal is tied to producing proposals as an independent actor, limiting demand and incentive for public interest mobilization. Inversely, in the case of Own Initiative Reports the EP strengthens NGO mobilization as it tries to gather input legitimacy, in an attempt to impact the EU agenda and assert its political-representative nature.

This risks creating a cartel of representation across institutions and within specific file types. In policy terms the EP can reduce this issue by encouraging and potentially funding stronger public interest participation in OLPs and committees that impact common market policy where the Commission is particularly active. Moreover, the EP could increase its output legitimacy and overcome part of this bias by strengthening its research capacity to be less dependent on economic interests' inputs. Conversely, economic interests that can bring a wider political perspective should be encouraged to participate in INI procedures, while public interests can be encouraged to participate in OLP files. In so doing the aggregate legitimacy of the EP could be increased.

Framing mobilization diversity across sub-systems requires conceptual tools that can model permanent institutional traits at fine-grained levels of analysis, and we find that legitimacy arguments do so successfully. Ultimately the nature of the interest group and its incentive structure impact the legitimacy it carries; as a mirror image, procedures with different functions (OLP and INI) engage in different authority functions demanding different types of legitimacy.

Drawing from our analysis across procedures we find that interest group mobilization in the EP is a product of both the Commission's legislative initiatives and parliamentary initiatives. However, it is unclear how these initiatives interplay in lobbying strategies and to what extent they impact the mobilization of groups in other EU institutions, specifically in the Commission. Future work could examine the potential impact of the EP's initiatives on interest group activity within it, as well as across institutions, as a way of covering what appears to be a large and distinct part of its puzzle and the politicization of EU interest group mobilization. Finally, the implications of this paper potentially apply beyond the EU; it is possible that interest group diversity is driven by procedural variations in other institutions at the national and international level.

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