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No place like home? Explaining venue selection of regional offices in Brussels

Jan Beyers, Tom Donas and Bert Fraussen

ABSTRACT While subnational authorities strongly mobilize in Brussels, they do not lobby all EU-level venues to the same extent. This article explains the varying intensity with which regional offices interact with various EU-level policy-making venues when seeking to influence EU policies. Theoretically, we complement an exchange-based perspective with political-institutional and contextual factors, such as regional political autonomy and the degree of preference alignment with key policy-making venues. To test our hypotheses, we rely on evidence collected through 33 face-to-face interviews with regional representations concerning their lobbying activities in four salient policy processes. Our results highlight that while most offices regularly interact with both national and supranational venues, the central government representation in Brussels is always, irrespective of what is at stake, the most important contact point. Furthermore, we also find that policy alignments shape venue selection, indicating some evidence of strategic manoeuvring.

KEY WORDS European Union; regional offices; territorial lobbying; venue shopping.

INTRODUCTION

The activities of subnational authorities (SNAs) in Brussels have been studied extensively since the mid-1980s, when the first regional offices opened (Greenwood 2011; Marks *et al.* 2002; Rowe 2011; Tatham 2008). Departing from a federalism or regionalism perspective, many authors have studied the interaction between sub-state and national governments and focused primarily on the vertical dimension of territorial politics (Borras 1993; Jeffrey 2000; Marks *et al.* 1996; Marks *et al.* 2002; Moore 2008; Tatham 2008, 2010). Other scholars have analysed the lobbying activities of SNAs at the EU level and showed that regional representations make strategic use of multiple institutional channels when seeking to influence policy outcomes (Bomberg and Peterson 1998; Hooghe 1995; Hooghe and Marks 1996; Rowe 2011). In this article, we analyse why SNAs prioritize different channels in their lobbying activities by considering organizational and contextual factors. Why do these actors focus their attention on the Permanent Representation (PR) of their home country, or prefer to interact with the European Commission (EC) or

key actors in the European Parliament (EP)? This topic is of great relevance, as the venue shopping behaviour of organized interests offers insight into the nature of EU policy-making. It provides an indication of where actors believe power is located and enables us to assess the importance of national and supranational routes in seeking policy influence (Coen and Richardson 2009; Greenwood 2003; Mazey and Richardson 1993: i).

The study of regional offices, more specifically their involvement in EU affairs, played a pivotal role in the debate on whether the EU-level mobilization of regions can be understood as a multilevel power play between the central-state level, the sub-state level and the European level (Hooghe 1995; Hooghe and Marks 1996; Marks *et al.* 1996). Following neo-functional perspectives, one would expect that supranational venues, such as the EC and EP, are prioritized by subnational authorities. As such, regional mobilization could diminish the pivotal position of the member states in the European political order. Intergovernmental accounts, on the other hand, would emphasize the continuing centrality of the nation-state and therefore predict that subnational actors first and foremost interact with central governments. If, however, both national and supranational routes are frequently taken, the observations would be most in line with a multilevel governance perspective (Eising 2004).

Considering that SNAs engage in activities that are similar to the practices of organized interests, we believe that insights from the interest group literature might be useful for an analysis of the strategic behaviour of regional actors (Donas *et al.* 2014). Our objective is to develop a systematic account of the lobbying strategies regional offices employ in Brussels by focusing on specific conditions that explain venue selection. To clarify venue selection, interest group scholars frequently apply resource exchange theory in which policy-makers are expected to grant access to groups in return for information and legitimacy. In response to this, organized interests are presumed to strategically target venues whose needs match with their resources. Notwithstanding its potential for clarifying lobbying patterns and the access interest groups enjoy, we argue that this exchange perspective needs to be complemented with political-institutional factors, *in casu* the extent to which regions enjoy political autonomy, and the broader context within which these actors are embedded, such as their network embeddedness and their preference alignment with key policy-making institutions.

This article first introduces the relevant institutional venues and presents the overall policy context to which our analyses apply. Then we clarify how key organizational features and contextual factors are expected to explain variation in venue selection. Our empirical analyses indicate that the lobbying activities of regional representations are strongly focused on both national and supranational venues. In addition, almost all regional offices develop extensive contacts with the PR, irrespective of the policy issue at stake. We also find that venue selection cannot solely be explained by mechanisms of information exchange, as the extent of preference alignment also is a relevant explanatory factor.

MULTI-INSTITUTIONAL VENUE SHOPPING BY REGIONAL REPRESENTATIONS

EU policy-making can be conceived as a multi-institutional process, in which organized interests face various access points when seeking to influence policy outcomes (Coen and Richardson 2009; Greenwood 2003). Moreover, all these arenas should be monitored closely, as policy changes can be initiated in many venues, and events taking place in one venue might shape later developments. Still, constraints in terms of time and resources will urge stakeholders to prioritize certain institutions, which may lead to considerable differences in venue-shopping behaviour. Previous research has demonstrated that only a limited number of organized interests are true multilevel players who make frequent use of national *and* supranational access points (Beyers and Kerremans 2012; Eising 2004).

In this article, we distinguish between four key venues that regional interests are likely to frequent when seeking to influence EU policies: the Commissioners; the Directorate General in charge of a specific case (DG); the EP Rapporteur; and the PR.¹ We concentrate our explanatory analyses on contact-making with these venues, as we presume they are critical decision-making points. A focus on the EC is obvious given its important legislative and executive role, the latter referring to the supervision of policy implementation as well as the management of EU finances (Bouwen 2009: 20). Taking into account the internal fragmentation of the EC, we distinguish between contacts at the highest level with the Commissioner (including his/her cabinet) and interactions with DG officials. While the former has more discretionary power, the latter are in charge of most preparatory policy work (Bouwen 2009: 25). As a result of its growing legislative powers during the past two decades, the EP has become an increasingly important access point. Here, most lobbying activities are channelled through the Committees, where the EP Rapporteur represents one of the main gatekeepers (Lehman 2009: 52; Rasmussen 2014: 6). Yet, also national governments and their representation in the EU remain important access points, providing a low-cost lobbying option (Beyers and Kerremans 2012; Coen 1997).

While most EU policy-making is of a regulatory nature, we believe that there are good reasons to focus on distributive issues when studying how regional representations select venues. Regional offices monitor a large array of policy domains, but generally prioritize a limited number of distributive issues in their lobbying activities (Donas *et al.* 2014). These policy domains – such as agricultural and cohesion policy – represent the bulk of the EU's budgetary expenditures, and their intergovernmental nature will stimulate venue shopping (Broscheid and Coen 2007). This article focuses on four re-distributive cases that generated the highest level of political attention from regional representations between the end of 2011 and early 2012: the Reform of the Common Agricultural Policy Reform (CAP); Regional Policy Reform; Trans-European Transport Networks (TEN-T); and Horizon 2020. The high density of regional

lobbyists active on these cases makes the process of venue prioritization even more critical, as seeking and gaining access to all relevant policy-making venues will be costly or often not possible due to time and resource constraints.

In each of these cases, the Commission submitted legislation to revise existing policies. As these policies involve the allocation of financial resources, the main conflictual issues were mostly of a distributive nature. The Regional Policy Reform concerns the overall revision of the criteria for allocating regional and structural funding. Salient matters here involve the size of budget, the threshold criteria in order to be eligible to structural funding, and the creation of a transition category. The CAP Reform aims to modernize the CAP and render it both more market-oriented and sustainable. Key topics of concern for regions were the greening of the CAP, the earmarked funding and rural development. Third, TEN-T deals with the allocation of funds aimed to improve infrastructural transport links. Here, lobbying focused mostly on specific projects, such as the Bothnian Corridor in Scandinavia and the Brenner Bass Tunnel from Austria to Italy. Finally, Horizon 2020 revises the EU Framework Programme for Research and Innovation; its goal is to strengthen the position of science in the European economy, for instance by bridging the gap between research communities and industry. One of the main issues here was whether funding should be focused on a narrow set of regionally concentrated top universities, or more geographically balanced across Europe.

THE DETERMINANTS OF MULTI-INSTITUTIONAL VENUE SHOPPING

Interest group scholars often apply exchange theory and focus on functional needs to explain the interaction between organized interests and policy-makers (Berkhout 2013; Beyers and Kerremans 2007; Bouwen 2002; Braun 2012, Eising 2007). In short, the argument goes that policy-makers possess limited resources and therefore require informational input from external actors. Simultaneously, societal interests seek to interact with policy-makers and supply policy-relevant resources, such as expertise and legitimacy, in exchange for access and attention. This perspective emphasizes the capability to supply information as main explanatory factor for interest group access, which is mostly conceptualized as a function of resource endowment (often measured in terms of staff size), as effective policy monitoring and gathering expertise on various issues exhausts organizational resources (Klüver 2012). In this view, more resources help to supply high-quality policy goods and therefore enhance the likelihood of access. However, some have argued that especially the EC is in constant need of expert information (Bouwen 2002). Therefore, the impact of resources should be more outspoken with respect to the Commission. More generally, the threshold for lobbying supranational venues is considered higher compared to building contacts with national venues such as the PR (Beyers 2002; Beyers and Kerremans 2012; Coen 1997). Therefore, we propose the following hypothesis:

Hypothesis 1: Regional representations with more resources are more likely to seek information exchanges with supranational venues such as the EP Rapporteur or the EC.

In addition to resources, we also consider political-institutional factors. In this regard, we should take into account the redistributive nature of the four policy processes. Whereas in regulatory politics European policy-makers need a high level of technical input, the intelligence required on redistributive issues is of a more positional nature (Broscheid and Coen 2007: 354). Moreover, intergovernmental bargaining between the member state governments plays a central role on redistributive issues. Consequently, we expect that regional representations will closely co-operate with the national PR. On redistributive issues, regions will need and seek the support from the central government, as the latter is directly involved in the decision-making processes in the Council. This is particularly likely if regions have budgetary and policy competencies in multiple policy domains, which make that policy outcomes directly affect the budget of regional governments. Moreover, regions with much self-rule generally have established extensive relations with central governments, which further strengthens the use of national channels (Callanan and Tatham 2014: 194). In short, we anticipate that SNAs with much self-rule will mostly seek contact with the national PR, and these contacts will prioritize the higher political and diplomatic level of officials that are involved in the *Comité des Représentants Permanents* (COREPER), as these are most closely monitoring EU-level intergovernmental bargaining:

Hypothesis 2: Regional representations that represent an SNA with much self-rule are more likely to seek information exchanges with their national PR at the COREPER level.

The activities of regional offices are not restricted to exchanges with domestic and supranational institutional venues though. They also liaise with other actors in order to collect information on EU policy-making. For instance, SNAs develop regular contacts with each other through trans-regional associations, the latter referring to associations of SNAs from different member states, *yet also* through informal networking with other regions (Beyers and Donas 2014; Borras 1993; Donas and Beyers 2013; Hooghe 1995; Tatham 2008). Being tied to such networks may make them a valuable source of information for policy-makers at both the national and EU level, as it shapes the type of information regional offices can supply. In general, regional offices with more formal affiliations with transregional associations are expected to show a higher propensity to target multiple institutional venues at both the domestic and supranational level. Yet, not only the formal embeddedness in EU-level networks matters, but also the overall inclination to connect with regional authorities located in other member states. For instance, by maintaining informal ties with regional representations from other member states, an office gains considerable expertise on the positions and interests of other EU regional

authorities. Being well-informed on these matters may lead to a higher likelihood of developing contacts with supranational institutions. In contrast, networks that are mostly focused on regions from their own member state demonstrate a more national orientation, and thus a stronger inclination to prioritize exchanges with the PR. Therefore:

Hypothesis 3a: Regional representations with many formal affiliations with transregional associations are more likely to seek information exchanges with the Rapporteur of the EP, the PR and the EC.

Hypothesis 3b: Regional representations that develop mostly informal networks with regions from their own member state are less likely to seek information exchanges with the Rapporteur of the EP or the EC, and focus mostly on the PR.

Next to considering political-institutional factors, regional representations will to a certain degree make tactical choices regarding the venues they target. A first element relates to the alignment between regional policy positions and the venues addressed. In line with earlier research on interest groups, we expect that also regional representations will mostly interact with like-minded policy-makers (Hall and Deardorf 2006; Hojnacki 1997). Rather than make large investments in venues that offer a limited chance of lobbying success, regional representations will focus their attention on those venues that are somewhat receptive to their policy demands. By testing this hypothesis for three institutions we can assess the strategic nature of multi-institutional venue-shopping. Furthermore, the pivotal importance of the EC may imply that a lack of alignment with its position not only decreases the propensity to target the Commission, but also increases the propensity to interact with the member state PR. More generally, we expect that non-alignments with the position of one venue will decrease the propensity to seek exchanges with this venue, but that it could stimulate actors to seek access to alternative venues. This leads to two hypotheses:

Hypothesis 4a: The higher the alignment between the position of the regional office and an institutional venue, the higher the chance that the office seeks information exchanges with this venue.

Hypothesis 4b: The lower the alignment between the position of the regional office and an institutional venue, the higher the chance that other venues will be addressed.

Finally, the policies on which lobbying takes place are also expected to shape venue selection. One interesting aspect of the four distributive policy processes we analyse is that they epitomize different types of issues, with unique constellations of conflicts and alignments. Therefore, each policy process could be expected to attract a distinct set of stakeholders. Some of these processes, such as the Regional Policy Reform, attract a high number of regional representations and can be viewed as their natural habitat. Other topics are less

exclusively concerned with territorial matters and will attract a more diverse crowd of organized interests, including business actors and civil society (for instance, Horizon 2020). As the latter two have industry-specific knowhow at their disposal or can mobilize important constituencies, their input and support can be of great value for policy-makers. Regions potentially face strong competition from stakeholders in cases with a considerable mobilization of functionally organized interests, particularly if the regional policy views diverge from a prevailing policy consensus. Anticipating such high levels of competition, regional offices may opt for a more modest role (see also Coen [1997: 105]). This leads to our final hypothesis:

Hypothesis 5: In issue areas with many other competing stakeholders than regional offices, the regional representations are less likely to seek information exchanges with key policy-makers.

RESEARCH DESIGN

To collect data on venue selection we conducted face-to-face interviews focusing on four distinct policy processes with the directors of 33 regional offices. The identification of these policy processes relies on data collected through a telephone survey with 127 regional representations (conducted in the autumn of 2011 and winter of 2012; see Donas *et al.* [2014]). These interviews pointed at four cases that were most salient to regional representations late 2011–early 2012: the Regional Policy Reform; the CAP Reform; TEN-T; and Horizon 2020. At least 30 per cent of the responding offices demonstrated lobbying activities in these four cases. During the spring of 2012 we conducted in-depth expert interviews with regional offices that lobbied actively on one or more of these cases; these interviews focused on the strategies offices deployed in Brussels. In order to attain both a sufficient participation rate and a representative overview, we used different criteria to select these experts. We tried to increase comparability between the cases by selecting regional representations that during the telephone interview mentioned to be active on at least two and preferably three of the studied policy processes. In this way, one expert interview provided us evidence on more than one single case.² The interview question related to the dependent variables – the targeted venues – was formulated as follows:

With respect to [NAME SPECIFIC POLICY PROCESS] did you exchange information regularly with [NAME TARGETTED VENUE]?

We aimed to interview a diverse set of offices in terms of staff size, policy position and self-rule. In total, 47 offices were invited for an interview and in the end a diverse set of 33 large and small regional offices participated (a response rate of 70 per cent). Although we interviewed somewhat more active offices, our set of interviewees represent SNAs with low and high levels of self-rule, as well as

SNAs that adopted different policy positions and that originate from a diverse set of member states (see online Appendix [supplemental material]). More specifically, of the 33 representations that were interviewed, 14 worked on CAP, 20 on Horizon 2020, 32 on the Regional Policy Reform and 21 on TEN-T. As we are primarily interested in the political activities related to these specific processes, the units of analysis are the 87 lobbying campaigns. For the independent variables, we rely on data from secondary sources, the 33 expert interviews and information collected through the telephone interviews with 127 regional representations.

The data on the offices' staff size were collected during this larger survey. To measure self-rule – autonomous authority exercised by the SNA executive over the constituency living in the region – we use the index developed by Hooghe *et al.* (2010), which involves a combination of four four-point items measuring institutional depth, policy scope, fiscal autonomy and representation.

The evidence on the policy alignments was collected through the 33 face-to-face interviews during which respondents were asked detailed questions concerning their own policy position and the positions of other actors. In order to measure the distance of a regional representation's position to the EP, the EC and the central government, the respondents were first asked to describe (through an open question) how they perceived the (various) lines of conflict related to each case; next they had to identify which of these conflicts were most important to their regional representation and the central government. The next questions focused on this particular conflict line and respondents were asked to position all the stakeholders involved on an 11-point scale ranging from -5 to $+5$. Subsequently, the respondents had to indicate the position of their region, the central government, the EC and the EP on the same continuum. Alignments are measured on the basis of the absolute difference or the distance between the position of the region and the position of the EP, the EC or the central government. This distance scale index ranges from 0 (perfect alignment) to 7.5 (maximum de-alignment) with a median distance of 2. Yet, in 20 per cent of the cases respondents reported difficulties or were reluctant in positioning themselves *vis-à-vis* some institution, especially if the institution had not taken a clear position, for instance because it was less directly involved in a specific issue. This was particularly the case with regard to the EP's (lack of a) position *vis-à-vis* the implementation of some TENT-T projects. In such instances, expert-based interviews limit the use of fine-grained scales and a forced use of a fine-grained scale may lower overall data-quality. Hence, our evidence allows us to differentiate cases with considerable alignment (low distance) from cases with non- (no clear position) or de-alignment (a large distance). We classified cases with a distance lower or equal to the median distance as being aligned; other cases were coded as dis-aligned.

In the telephone survey, we also asked to name other Brussels offices with which they informally exchanged information during the past six month; the total number of ties a regional office initiates with other offices measures its informal network. To assess the extent to which an office prioritizes exchanges

with offices from its own member state (or rather with regions from other member states), we use Krackhardt and Stern's E-I index (1988: 127–8; see Beyers and Donas 2014) which indicates the propensity of regions to establish exchanges outside the group – in this case their member state – to which they belong. The index ranges from -1 (all exchanges within member state) to $+1$ (all exchanges with offices from other member states). For the data on the formal networks, the websites of the trans-regional associations were coded in order to obtain information on their members (Donas and Beyers 2013). For each regional representation, we mapped the number of memberships in a trans-regional association, as a proxy for the amount of formal affiliations. We add the (logged) count of ties a regional office initiated with other offices as a control variable; one can expect that more active offices are keener to address various institutional venues.

DATA ANALYSES

Before presenting our multivariate analyses, we describe the venue selection for the four lobby campaigns and the clustered structure of our data. Figure 1 visualizes the percentage of offices that reported contacts with each distinct venue on the four policy processes (only venues that are of a key concern in this paper are included). In about 90 per cent of the campaigns, the regional representatives had contact with someone within the EP, the national PR and the EC, which indicates that all these institutions represent pertinent lobbying venues. Contact with a Commissioner appears relatively less common, but still more than 50 per cent of the regional representations established contacts at this level. However, these institutions should not be considered monoliths; they consist of different components (Hooghe and Marks 1996; see also Tatham 2008). If we look more closely at some critical decision-making venues, such as the EP Rapporteur or the competent DG, we observe that there is considerable variation in the extent to which regional representations interact with these actors.

It is clear that regarding the EC attention is targeted at the DGs, and that Commissioners, who are politically appointed and supervise the civil servants of the DGs, are less frequently approached. Besides targeting the Commissioner in charge, a regional representative can also approach another Commissioner in order to indirectly influence a specific issue. Yet, regional representations develop very little contacts with the Commissioners from their own member state (15 per cent with their national Commissioner compared to 63 per cent with the competent Commissioners). Likewise, concerning DG officials regional offices can focus on the lead DG in charge, or other DGs that might have a small stake in a specific case. Contacts with DGs situated in other policy fields, however, are fairly rare, as only 15 per cent of our respondents reported such contacts. While nationality does not play a key role for the Commissioners and the DGs, it plays some role for the EP. Here, regions establish considerable contacts with MEPS from their member state (84 per cent). In

Table 1 Research hypothesis, indicators and descriptive statistics

	<i>Hypotheses</i>	<i>Average</i>	<i>Standard deviation</i>	<i>Minimum–maximum</i>	<i>Data source</i>
Political capabilities					
Staff (logged)	(H1)	1.48	0.92	0–3.43	Telephone survey
Self-rule	(H2)	9.59	2.48	4–13	Hooghe <i>et al.</i> (2010)
Network embeddedness					
Membership affiliations (logged)	(H3a)	1.85	0.81	0–3.37	Online website coding
Krackhardt and Stern's E-I index	(H3b)	-.18	.45	–1–1	Telephone survey
	control	13.40	7.87	1–36	
Total informal ties (logged)					Telephone survey
Policy position	(H4)				Expert interviews
Alignment with the EC		0.43	0.50	0–1	
Alignment with the EP		0.31	0.47	0–1	
Alignment with the central government		0.31	0.47	0–1	
Involved in	(H5)				Expert interviews
Regional Policy Reform	(H5)	0.37	0.49	0–1	
Horizon 2020		0.23	0.42	0–1	
TEN-T	(H5)	0.24	0.43	0–1	
CAP Reform	(H5)	0.16	0.37	0–1	

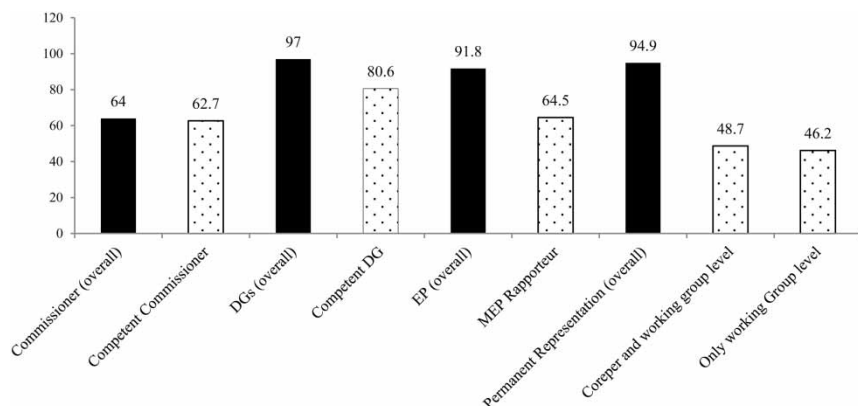


Figure 1 Venues regional representations approach in four lobby campaigns (percentage of contact-making, $n=87$)

contrast, contacts with the EP Rapporteur and Members of the European Parliament (MEPs) from other countries are also less frequent (56 per cent versus 64 per cent), an observation that confirms the national orientation of regional offices (see below). Given the key role the EP Rapporteur plays in the legislative process and the importance of their position for lobbyists, the analysis below focuses on the EP Rapporteur (Rasmussen 2012: 243).

Finally, when we look at the PR, almost all regional representations (95 per cent) had contact with their national PR; only four offices did not report contacts with the PR in specific lobbying campaigns. Yet, there are considerable differences regarding the level that is approached. One can roughly distinguish two levels in the PR. The lower level involves the national officials who meet in Council working groups and assist and prepare the meetings of COREPER. The former are usually policy experts seconded from the national and, for some countries, the regional bureaucracy, while the latter are high-level diplomats who are responsible for preparing ministerial level Council meetings, negotiate in COREPER and consequently play a key role in the policy-making process. We can clearly identify two equally sized sets of regional offices. On the one hand, we have offices that focus their energy on the working group level only (46 per cent), while there is another group that in addition to contacts with working groups also addresses higher-level COREPER officials (49 per cent). The analyses below concentrate on explaining why some offices address these higher levels in the PR.

Before we turn to a multivariate analysis, we point at the clustered nature of the data. In particular the nesting of our interviewees – heads of regional offices – in member states is something to be careful about, especially because much of the above cited research demonstrated that member state embeddedness considerably affects a region's lobbying practices (Callanan and Tatham 2014; Donas and Beyers 2013). To begin with, we tried to minimize dependency

problems through the way we arranged the interviews. A risk with interviews is that respondents are tempted to repeat their responses when confronted with similar questions for different cases, which causes dependencies due to an interview effect. During the interviews we deliberately focused the interviewees to differentiate and compare the different processes in which their office was involved. Of course, this does not entirely rule out dependent observations, but we believe it minimized dependencies due to interview effects and made that observed clustering will mostly have substantive reasons. Therefore, we assessed how the extent of clustering differs for the various dependent variables. To check this – e.g., whether homogeneity within sets of regions, country or cases reduces the overall variability in our sample and results in a lower effective sample – we calculated the intra-class correlation (ICC), the design effect (DE) and the effective sample size (ESS) for the four dependent variables (DG, EP, EC and PR) and three levels (region, country and policy process).

The pattern of clustering shown in Table 2 provides us with some relevant insights. First, the clustering of campaigns in 33 interviews (regional offices) shows little relation with the dependent variables, except for the PR where we observe a strong effect of clustering. For the PR, the ICC is 0.47, which means that almost half of the total variation is accounted for variation between the 33 interviews only. It is interesting to see that clustering occurs primarily with regard to a variable that is strongly member-state related, i.e.,

Table 2 Assessing the extent of clustering and independence (intra-class correlations ICC, effect design ED and effective sample size ESS)

	EP	European Commissioner	EC DG	PR
Interviews 33 (k)/ Campaign 87 m=average units in a cluster=2.64 m*k=87	ICC = 0.03 DE = 1.05 ESS = 83	ICC = 0.00 DE = 1 ESS = 87	ICC = 0.09 DE = 1.15 ESS = 76	ICC = 0.47 DE = 1.77 ESS = 49
Country 14 (k)/ Campaign 87 m=average units in a cluster=6.21 m*k=87	ICC = 0.18 DE = 1.94 ESS = 45	ICC = 0.05 DE = 1.26 ESS = 68	ICC = 0.00 DE = 1 ESS = 87	ICC = 0.47 DE = 3.45 ESS = 25
Policy process 4 (k)/ Campaign 87 m=average units in a cluster=21.75 m*k=87	ICC = 0.13 DE = 3.70 ESS = 24	ICC = 0.19 DE = 4.94 ESS = 18	ICC = 0.02 DE = 1.42 ESS = 61	ICC = 0.00 DE = 1 ESS = 87

Notes: $DE = 1 + ICC(m-1)$; $ESS = m*k/DE$; numbers are in bold where ESS drops below 70.

seeking contact with the PR. Second, with the exception of targeting EC DGs, the clustering in the 14 member states has a considerable effect on the ESS. Again, the effect is most outspoken for the PR, although it is also considerable for the EP. Note that the descriptive analysis above also demonstrated that while nationality plays an important role for the EP, this is not the case for the EC. Finally, as expected, there is, considerable clustering for the policy issues, in particular for the EP and the Commissioners.

Our multivariate models are estimated with generalized estimating equations (GEE) and the quasi-likelihood information criterion (QIC) for evaluating model fit (Pan 2001). For the PR we estimated a model comparing those who approach high-level COPEPER officials with those who establish their contacts mostly at the level of the working groups. We control for the issue clustering with three dummies; as reference category we take the Regional Policy Reform, because this process involves most regional mobilization and can be seen as the main focus of much regional lobbying. As our sense is that that the clustering of 33 interviews is largely equivalent to the member state clustering, we use a logistic regression with corrected standard errors whereby we cluster by member state. Table 3 presents the results from our analyses.

Most lobbying activity of regional representations focused on the Regional Policy Reform. Yet, although the parameters are always negative, it is only in the cases of Horizon 2020 and TEN-T (but only for contacting the Commissioner) that these coefficients are significant. It is worthwhile noting that Horizon 2020 differs considerably from the other three cases in terms of alignment and the overall competition surrounding this case (Hypothesis 5). First of all, this process is characterized by the highest policy distance between regions and all three venues.³ Second, the overall distance between the member state central governments and the EC is very low compared to other policy processes.⁴ It appears that a relatively close alignment of the positions of central governments and the EC, in combination with a considerable distance between regions and the EC, depresses attempts to interact with all supranational venues (the EC, DGs and the EP Rapporteur), possibly because the gains that can be made are rather limited. In other words, when the policy dis-alignment of a region with their central government and the EC is large, regional representations might decide not to invest too many political resources.

For the PR it is only with regard to Horizon 2020 that we observe a significant association between the level at which contacts are established (COREPER level *vis-à-vis* only working group level) and specific policy processes. In the case of Horizon 2020 most contacts take place at a lower level within the PR. Importantly, the frequency of contact with the PR (albeit sometimes at a lower level) is always high. This is a relevant observation, as it shows that the PR always is a central partner for regional offices, regardless of what is at stake, or the particular policy positions of the regional government.

As hypothesized, the self-rule of a region, a proxy for its ability and its need to supply regional/national encompassing political information has a considerable impact on the level of contact within the PR. Regions with considerable self-rule

Table 3 Modelling the likelihood of EU-level venue shopping by regional offices (logistic regression results)

	<i>EC DG in charge</i>	<i>European Commissioner</i>	<i>MEP Rapporteur</i>	<i>Permanent Representation</i>
Constant	1.99 (1.06)	-0.69 (1.10)	-1.82 (1.98)	-8.13*** (2.38)
Staff size (logged) (H1)	-0.17 (0.32)	0.50 (0.42)	0.78 (0.53)	-0.07 (0.47)
Self-rule (H2)	0.11 (0.12)	0.20 (0.74)	-0.42 (0.29)	0.51** (0.15)
Affiliations (logged) (H3a)	-0.48 (0.32)	-0.42 (0.49)	1.32** (0.51)	-0.06 (0.39)
E-I index (H3b)	1.22† (0.72)	1.95** (0.74)	-1.63 (1.49)	1.85 (1.23)
Total ties (logged) (control variable)	0.31 (0.41)	0.41 (0.41)	2.22*** (0.50)	1.40† (0.79)
Alignment with the EC (H4)	1.13* (0.53)	2.27** (0.76)	1.77† (1.05)	-0.14 (0.77)
Alignment with the EP (H4)	0.46 (0.93)	-2.24* (1.03)	-0.81 (0.86)	-0.61 (0.64)
Alignment with the central government (H4)	-1.09† (0.59)	-1.09 (0.72)	0.67 (0.90)	-0.59 (0.65)
Regional Policy Reform (ref) (H5)	-	-	-	-
CAP Reform (H5)	-0.23 (0.83)	-0.71 (1.35)	-1.55 (0.99)	-0.31 (0.93)
Horizon 2020 (H5)	-1.82** (0.63)	-3.61*** (0.93)	-3.47*** (0.99)	-1.10† (0.59)
TEN-T (H5)	-0.48 (0.74)	-3.14*** (0.79)	-1.53 (0.99)	-0.65 (0.52)
N cases (member states)	87(14)	84(14)	84 (14)	74 (14)
QIC null model	112.02	101.31	113.21	109.86
QIC model	108.42	87.73	85.57	99.81
QICu	114.17	92.09	88.41	94.50

Notes: Corrected standard errors clustered by member state, † = <0.1, * = <0.05, ** = <0.01, *** = <0.001.

are much more likely to establish contacts at the COREPER level, while those without much self-rule stick to the working group level. This is also exemplified when we compare two federal countries (Germany, Austria) and two regionalized countries (Spain and the UK) with the other countries. For offices representing regions located in these four countries, 84 per cent of their contacts are situated at the COREPER level, while this is only 26 per cent for the other countries. On the other hand, regions with much self-rule are not significantly

more likely to approach supranational venues. This shows that, although regions with much self-rule are eager to establish their own regional office (Donas and Beyers 2013), such regions are not necessarily better tied to EU-level policy-making venues. However, their strong Brussels-based presence clearly corresponds with a considerable propensity to develop connections at the diplomatic levels within the PR. This shows that in concrete lobby campaigns on salient cases, offices representing highly autonomous regions function as relevant Brussels-based liaisons between the regional government and the central state government.

Interestingly, political capabilities, measured as overall staff size, have no significant effect. Generally, once mobilized in Brussels (by establishing a regional office), other factors than resources appear more important in explaining venue shopping behaviour. We have significant bivariate correlations in the case of the EP Rapporteur and the PR ($r = 0.21$ and 0.35 respectively), but these bivariate relations evaporate when we control for other variables such as networks, alignment or self-rule. Regional offices with more affiliations with transregional associations and those who initiate more informal ties are more likely to establish contacts with the EP Rapporteur, but in contrast to our expectation this variable generates no significant effect for the Commission.⁵ It is also relevant to briefly note the results for the PR. We have significant bivariate correlations for some network variables and the chance that an office established ties with the COREPER level ($r = -0.35$ for affiliations, $r = 0.42$ for total ties, and a non-significant correlation of $r = 0.14$ for the E-I index). However, these correlations diminish considerably in value when we control for self-rule (see above), and only the total amount of established ties with other regional offices has a positive impact on seeking contact with the higher political-administrative levels in the PR. As we show elsewhere (Beyers and Donas 2014), most of these ties are with offices representing a region from the same member state. Therefore, these results confirm the dominant inward-looking propensity of most regional offices. Furthermore, the inclination to establish exchange relations with regions from other member states (measured with the E-I index) makes regional offices significantly more eager to network with the EC – both the Commissioner and the DG in charge – and confirms the relevance of an extensive embeddedness in outward-looking EU-level informal networks for interactions with the Commission.

Finally, the results show that policy alignments clearly affect regional lobbying strategies. Generally, we have considerable support for hypothesis H4a. A proximity with the ECs policy position stimulates contact making with supranational venues, in particular the DG ($\text{Exp}(\beta) = 3.09$) and the Commissioner ($\text{Exp}(\beta) = 9.68$). The fact that we do not observe any impact for the PR again confirms that alignment with the central government has no impact on who is contacted within the PR; basically, regional offices will always talk with the PR.⁶ We have some support for H4b. If there is a considerable dis-alignment with the EP, the regional lobbyist will increase its efforts to approach the Commissioner ($\text{Exp}(-\beta) = 9.39$). The more a region's policy position is aligned with the

central government, the less likely it is to interact with the DG in charge; or, a dis-alignment with the central government increases the likelihood to target the DG ($\text{Exp}(-\beta) = 2.97$), which fits into the image of the Commission as a potential ally for regional actors. Although these effects remain rather modest, they are indicative of the tactical nature of regional lobbying.

CONCLUSION

Regional offices are increasingly mobilized at the EU level, and understanding how they operate provides insight into the nature of the European political order, namely the extent to which EU policy-making reflects a governmental arena in which member states still occupy a dominant position, or rather is consistent with functionalist or multilevel governance accounts (Marks *et al.* 1996; Moravcsik 1998). Theoretically, we argued that multi-institutional venue shopping cannot solely be explained by dynamics of resource exchange, but also needs to account for political-institutional and contextual factors, such as political alignments, specific characteristics of the policy issues concerned and the networks in which regional offices are involved.

The results indicate that regional offices frequently approach civil servants of the Commission, the EP Rapporteur and the PR, while contacts with the Commissioner and her/his cabinet are relatively more scarce. Importantly, there are substantial differences between these venues in terms of whom they attract. First, we observe an impact of the nature of the policy case on the targeting of the EP Rapporteur, the Commissioner and the DG, as contact with these venues was most intensive on the Regional Policy Reform, but significantly less frequent for Horizon 2020 (where central government positions were closely aligned with the EC, while the EC position diverged substantially from the regions). Second, an alignment with the EC increases the chance to lobby the EC Commissioner and DG in charge, while a dis-alignment *vis-à-vis* the EP and the central government makes regional offices more likely to seek interaction with respectively the DG and the Commissioner. Third, although these findings fit into the traditional image of the Commission as a potential ally of regional interests (Hooghe 1995; Hooghe and Marks 1996), the exchanges with supranational venues do not lower the efforts to address national institutions. We have no evidence that the mobilization of regions implies the bypassing of the central state, even not for regions with a high level of self-rule. On the contrary, irrespective of what is at stake, the national PR is always a relevant interlocutor, and especially more autonomous regions are eager to touch base with the higher levels in the PR. These findings are in line with other research that concludes that the regionalization of European states has not hollowed out member state representation and that sub-state authorities collaborate intensively with central state authorities, rather than bypassing them (Tatham 2008; 2010; 2012; see also Moore 2008).

Finally, one important caveat seems in place. By focusing mainly on key contact points, we were able to demonstrate the strategic nature of multi-

institutional venue shopping in the EU. However, as our analyses only apply to these contact points, care is needed when trying to generalize these results to the entire institution (for instance, the EP), as other access points (such as domestic MEPs, but also shadow-rapporteurs) might also be relevant venues for some regional offices. Moreover, the results could be different for regulatory or less salient cases where lobbying communities are possibly less dense. In addition, for future research it might be interesting to explore in more detail how regional offices seek political allies in the Brussels crowded policy environment. Finally, our analyses preclude us from making strong inferences on the precise policy influence of regional lobbyists. Future studies therefore might want to consider how various tactical decisions, such as venue selection and multi-institutional venue shopping, may generate effective policy influence.

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SUPPLEMENTAL DATA AND RESEARCH MATERIALS

Supplemental data for this article can be accessed on the Taylor & Francis website. (<http://dx.doi.org/10.1080/13501763.2014.977335>).

NOTES

- 1 The Committee of the Regions (CoR) is not taken into account as it has only an advisory function.
- 2 More precisely, one interviewee talked with us on one process, 11 interviewees informed us about two processes, 20 interviewees about three processes and one interviewee about four processes.
- 3 The median distance between regions and the EC, the EP and the national governments is respectively 4, 4 and 3.5. These numbers are considerably lower for CAP (3.5, 1.5 and 0.5), Cohesion (1.5, 1.5 and 3.5) and TEN-T (1, 1 and 3).
- 4 The median distance between central governments and the EC was 0 for Horizon 2020 (close to complete alignment), while the median was 3.5 or higher for CAP, Cohesion and TEN-T.
- 5 We lack a robust explanation for this because our knowledge about the precise role these transregional associations play in the EU is limited. One of the reasons could be that these associations are only loosely involved in the co-ordination of the individual lobby efforts of regional offices.
- 6 One might argue that regions and central governments are always aligned and that this explains their strong ties. However, our evidence shows that this is not the case. For instance, the median distance between regions and their central government is 3, while it is 1.5 for the Commission and 2 for the EP (see also Table 1).

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