Two Sides of the Same Coin
Preference Communication and Schools of Democracy: Civil Society Interest Groups at the European Union

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Table of Contents

List of tables .................................................................................................................. 3
Introduction ...................................................................................................................... 4
Chapter 1: Developing Theory, Designing Tests ............................................................. 7
  1.1. Literature Review .................................................................................................. 7
  1.2. Theoretical Framework ......................................................................................... 9
  1.3. Variables and Hypothesis ..................................................................................... 11
  1.4. Data and Case Selection ...................................................................................... 12
Chapter 2: Testing the Conduit Model ........................................................................... 15
  2.1. Conduit Model Introduction ................................................................................ 15
  2.2. Highly Specific and Congruent .......................................................................... 19
  2.3. Partially Congruent and Simplified .................................................................... 22
  2.3. Poorly Congruent ............................................................................................... 26
  2.5. Conduit Model Conclusion ................................................................................ 28
Chapter 3: Testing the Schools Model ........................................................................... 31
  3.1. Schools Model Introduction ................................................................................ 31
  3.2. Organisational Structure and Member Participation ............................................ 33
  3.3. Local Groups and Proximity to Members ............................................................. 35
  3.4. Group Communication: Informing and Socialising Members ............................. 37
  3.5. Schools Model Conclusion ................................................................................ 40
Chapter 4: Combining the Models ................................................................................ 45
Conclusion ...................................................................................................................... 49
Bibliography ................................................................................................................... 53
Appendix ........................................................................................................................ 59

List of tables

Table 1: Breadth measure ............................................................................................. 16
Table 2: Depth measure ............................................................................................... 17
Table 3: Conduit test sample ....................................................................................... 18
Introduction

Many of the most pressing challenging facing contemporary society are regional and global in nature; questions of environmental decline, financial regulation and justice require international solutions. Increasingly we place our hope in transnational institutions to work to solve these problems, to embody our collective will to find a solution. However there is much criticism of such organisations for their detachment from citizens and lack of democracy. Questions of how these problems can be solved are of huge significance for the involvement of citizens in the world’s response to many pressing problems. This research will examine some of these questions, with a focus on the European Union as an archetypal home of the democratic deficit.

The directly elected component of the European Union is the European Parliament (EP), whose role in legislation is revision and scrutiny. The executive branch resides in the bureaucracy, the European Commission (EC). This remains unelected, yet is responsible for the development and proposal of legislation. In a region where 70% of legislation enacted domestically is generated at a European level, where does the EC gain its democratic legitimacy, and how can it be said to embody the will of the citizens? This gap between the people of Europe and the EU’s executive branch especially, and the EU more generally, is referred to as the democratic deficit; a lack of democracy in the system. It is into this gap that interest groups and civil society may step in as part of ‘the community method.’ This describes the way in which the EC drafts legislation which moves to the EP and European Council for review; it also includes the consultation process the EC undertakes to ensure its legislation meets the needs of stakeholders and interested parties such as interest groups.

Various explanations have been posited for the contribution of interest groups to democracy. I will look at civil society interest groups: those groups that are constituted by a citizen membership (I will define my research population more explicitly in my theoretical framework). These are the groups most touted as bridging the democratic gap between European citizens and the EC, and as such will be the focus of my research. My central research question is: to what extent do civil society interest groups communicate the preferences of their members to the European Union?

Answering this question requires thinking about the role of civil society interest groups in two ways: first as conduits for transmitting citizen preferences, and second as veritable
schools of democracy. As conduits of citizen preferences, civil society interest groups act as a bridge between citizens and the EC, communicating the preferences of citizens to EU decision-makers. Traditionally, this role was broadly adopted by political parties. However with party membership in decline, legislative power shifting to Europe, and the lack of any meaningful member-based party structure in Brussels, interest groups and civil society have become the primary conduit of citizen views to Brussels. This makes understanding this process extremely important for assessing democracy in the European Union. As schools of democracy, civil society interest groups provide direct associational benefits to citizen’s development as democrats. This has a dual understanding. First that active membership of such associations teaches them to participate more widely, incubating the values of democracy, reciprocity and participation. The second meaning is that the participation helps form and shape people’s views, which change as a result of meaningful engagement with others.

In this thesis I test both models independently, and then advance a theoretical basis for their combination. I focus on the case of the Directorate-General for Climate Action for both tests. Initially I examine the conduit model in Chapter 2, comparing documents provided to the DG by interest groups as part of the open consultation process with the organisations stated positions on their member-facing websites. For the test of the schools model in Chapter 3 I interview key figures within the organisations I sample, as well as review documents to understand their procedures for member involvement and association.

My results suggest that whilst both models capture important features of the role of interest groups, the empirical reality requires more scepticism about what these groups can offer as a way to bridge the democratic deficit. Testing of the conduit model demonstrates that more specific group objectives translate better into consultation responses, but that many groups simplify their material when dealing with members, limiting how much they can be said to endorse the group goals. The schools model has similarly mixed results, with groups fulfilling a valuable role in informing members and the public, but with many members having very limited involvement and some groups offering little opportunity for member input in decisions.

My central argument in this thesis, drawn from the findings and articulated in chapter 4, is that both models are crucial for understanding the extent to which civil society interest groups are capable of communicating citizen preferences to the EU and thus mitigating the EU’s
democratic deficit. In other words, the two models are just different sides of the same coin: as schools of democracy, civil society interest groups create a public space for deliberation to elicit citizen views; as conduits, they these preferences to EU decision-makers, giving European citizens a voice at the EU level. Both models are required for a coherent account of what civil society groups can offer.
Chapter 1: Developing Theory, Designing Tests

1.1. Literature Review

The purpose of this review is first to make clear the literature which gives rise to this enquiry and frames the debate in terms of the democratic deficit in the European Union. It then critically examines the two key theoretical tenets which I will explore, the conduit model of interest groups and the schools of democracy model.

The democratic deficit

The notion of a European democratic deficit has garnered a considerable amount of academic attention. Indeed so much so that “the standard version [of the democratic deficit] is non-attributable” (Weiler, et al., 1995, p. 4).

The core arguments in this literature follow a common thread, well summarised in Follesdal and Hix (2006). First, European integration has led to the surrender of powers by national government to a European executive, which lies outside the democratic oversight of those governments. This would not be such a problem were it not for their second feature of the deficit; “that European Parliament is too weak” (Follesdal & Hix, 2006, p. 535). Elections are fought on domestic issues, often seen as a popularity contest for national governments, and turnout is low (European Parliament, 2009; The Independent, 2009), which means it’s unable to act as a democratic counterweight to the other European institutions (Follesdal & Hix, 2006, p. 535).

Follesdal and Hix also note that “the EU is simply too distant from voters,” which means that the EU is able to enact policies which are not well supported by citizens (Follesdal & Hix, 2006, p. 536-7). Not all scholars agree on the importance of the democratic deficit. Majone argues that there is no deficit, as the EU is not meant to be democratic as it remains an economic and regulatory union rather than a political one (Majone, 1998). However contemporary rhetoric of the ‘ever closer Union’ has dampened such criticism and whilst there is some variance over which features of the deficit are more important there is much agreement over its broad existence and themes (Steffek & Nanz, 2008, p. 1).

Communication of preferences and the conduit model
Along with changes to the Parliament’s powers, the EU’s engagement with civil society organisations, NGOs and other interest groups “is also viewed as crucial for narrowing the EU’s democratic deficit” (Karns & Mingst, 2010, p. 244). Jordan and Maloney point to two main distinct avenues for this contribution. The first they typify is “groups as democratic transmission belts” (2007, p. 7). Interest groups act as a bridge between citizens and institutions¹; forming a conduit to communicate the policy preferences of individuals who otherwise lack a voice. This theory was developed domestically in the context of the decline in political party membership, a traditional vessel for such activity (Mair, 2008; Schmitter, 2008). Compared to the broad church of political parties, interest groups can be specific and better tailored to their member’s preferences, and so better express them in the democratic field (Jordan & Maloney, 2007, pp. 7-8). At the European level this model has been especially important as there is no party involvement in the European Commission², and so interest groups have been taken on as the primary vessel for democratic communication of citizen preferences. Although there are different conceptions of representativeness (Borragán & Smismans, 2012), there is a broad assumption that interest groups will represent the interests of their membership. Whilst this might seem a tautology, I argue this cannot be fully assumed and must be subjected to some empirical investigation. This forms the first part of my thesis.

*Schools of Democracy*

The second aspect interest groups bring to the democratic table is the notion of groups being schools for democracy, so named due to the similarity with de Tocqueville’s concept. The idea is also found throughout social capital theory (Beyers, et al., 2008), with the same idea that association strengthens bonds between citizens, and so strengthens “democratic development” (Jordan & Maloney, 2007, p. 9).

The central theme of the idea is that interest groups offer a space for citizens to meet, discuss and develop their own ideas. This has merit along the classical lines that association is good for citizens in and of itself, as long suggested in political theory. John Stewart Mill even claimed “any participation, even in the smallest public function, is useful” (Quoted in Jordan & Maloney, 2007, p5), and that idea is still very much alive. It also has merit in theory by

¹ Jordan and Maloney talk more generally about political systems, but the work is applicable to the European case
² Except perhaps where parties act as interest groups and consult or lobby along with other organisations.
allowing citizens to develop their thoughts and policy preferences, resulting in a better policy outcome (Jordan & Maloney, 2007; Mansbridge, 1992).

This can extend to the role of interest groups being part of a process of deliberation with the rest of the EU, with interest groups helping information flow from the Commission to members (Saurugger, 2008). This associative work has been growing in prominence in the last decade, including an increased emphasis in European Commission white papers (Huller, 2010).

However much empirical work on this results in scepticism about the role of interest groups as the forums for the associative and deliberative democracy that the theory might like them to be (Maloney, 2009; Jordan & Maloney, 2007; Saurugger, 2008). There is also much debate surrounding slightly different normative theories of democracy and what they would mean in practice for the EC (Kohler-Koch & Finke, 2007). Within this context there is much scope for a critical assessment of the associational reality of these groups, and more importantly what this means for the relationship between citizens and the European Union. More linkage is needed between the issues of association, democratic theory and the reality of communication which will provide further insight into the democratic potential of interest groups in Europe. It is into this space I aim to place my research.

1.2. Theoretical Framework

The terms interest group and civil society organisation (CSO) are both highly contested in the literature. The problem is perhaps not so much that the concept is unduly nebulous but rather that scholars tend to adapt a definition to fit the population of their own enquiry (Beyers, et al., 2008). Thus ‘interest group’ has been used to refer to all organisations that undertake lobbying, but also only those which are really associative groups with the rest (business interests for example) referred to as interest organizations (Jordan & Maloney, 2007).

For my purposes the key is to carve out a description of the groups I intend to test; essentially, what groups allegedly contribute to democracy. For my first investigation into the conduit model I elucidated earlier the operative concept is interest groups as the connector between citizens and the EU. The groups I need to study are thus groups that represent civil society rather than industry groups and professional bodies. Similarly to test the associative
benefits I must focus on groups which have some possible associational aspect; groups which have members. To maintain focus on the European demos they should include European citizens who may be a part of the group’s internal decision-making processes. This follows from Jordan and Maloney’s definition of interest groups, which focuses on organisational makeup rather than functional activity (2007, pp. 26-34). However rather than taking a broader ‘civil society group’ label or attempt to utilise a definition of NGO, both of which may be even harder to define (Scholte, 2004; Martens, 2002), I must retain the interest group term in order to retain the key elements of that definition in the context of influencing policy at the European level. However I will be clear that I am referring to membership and supporter based civil society interest groups (whilst avoiding introducing a new clunky title into a crowded nomenclature).

Throughout the thesis I refer to ‘member or supporter facing’ material. This refers to output of the civil society interest groups which is designed to be read by members and supporters, such as their website, leaflets, and so on. Other materials, such as documents used in lobbying activities, are designed for decision makers, and are not member facing.

There are two central theories I will be testing; the conduit and schools of democracy models. The former sees interest groups as tools for transferring the preferences of citizens to the European Commission. They act, much as political parties act in many domestic systems, as a way for decision makers to glean the views of the population at large. As it is difficult for citizens to engage directly in a complex multi-level structure the interest groups step in, acting as a conduit to transfer the views of citizens as “democratic transition belts” (Jordan & Maloney, 2007, p.7). The second theory has a lengthy history throughout political thought as I described in the literature review. It focuses on the group itself, claiming groups act as places where citizens come together, promoting associational benefits to them and acting as schools of democracy; in particular incubating values of democracy in the citizens, informing them and allowing them to build social capital.

I will draw these two models together to create my theory of interest groups’ democratic contribution, arguing that in the context of the European polity nether can be considered independently. Instead they must be considered as two sides of the same coin, integrating the internal processes of deliberation and participation with the communicative function of representing citizens.
In the next section I move from these two central concepts to the variables required to test them, using the logic of the two theories to form my two hypotheses.

1.3. Variables and Hypothesis

My central question in this thesis is to what extent civil society interest groups communicate the preferences of their members to the European Union. As such, my dependent variable is the expression of interest group preferences in their lobbying activities. Ultimately, this variable acts as the operative determinant of the democratic contribution of interest groups to the EU, and by framing my investigation as such I will have the required scope in my analysis to identify the validity of the theorised contribution of interest groups to militating the democratic deficit. The objective of this study is to follow the original preferences of citizens. However, it would be unfeasible to obtain these citizen preferences directly so a proxy must be used. Here an assumption is made; namely, that individuals will join groups the stated objectives of which they identify with, and not other groups. This is an assumption consistent with the understanding of group membership in the literature where the notion of an ‘exit’ option is regularly applied to members who cease to identify with a group (Jordan & Maloney, 2007, pp. 33-34; Maloney, 2012, p. 93), as well as being intuitively extremely plausible. Thus, an interest group’s stated preferences are understood as mirroring members’ preferences, and so my central independent variable is the stated preferences of an interest group. I will trace these preferences to the EC by examining the information that the Commission obtains directly from interest groups, submissions made to the EU’s online consultation process.

The logical connection between the variables is split in two in accordance with the two veins of interest group theory I will be examining. Firstly, that the function supplied by interest groups is the communication of preferences from citizen to institution. For my first hypothesis I draw on the idea that interest groups contribute to democracy by more specifically representing citizen views (I detail my measure of specificity and its rationale in Chapter 2). To be more explicit, the purpose of the first hypothesis is to examine whether the stated preferences of an interest group (those which an interest group uses to define itself, which I use as a proxy for the citizen preferences), are those which are presented in a groups lobbying activities.
**H1:** The more specific an interest group’s stated preferences, the more likely those preferences are communicated to EU decision-makers.

In the second model I test, the schools model, the communication of preferences is not central; the process by which these are elicited and developed in the form of associative democracy is key. This hypothesis frames my investigation into the associational benefits of interest groups; primarily that they act as schools of democracy by allowing member involvement in groups. This hypothesis is not directly related to my dependant variable, the preferences communicated to the EC, because it focuses on the internal features of the groups. The testing will of course inform my investigation into the dependant variable, but for the statement of the hypothesis I do not refer to it directly.

**H2:** The more interest groups engage their members, the more associational democratic benefits are accrued.

In the next section I outline what information and data I use as indicators for the variables within my case study analysis.

### 1.4. Data and Case Selection

The testing of each hypothesis will be undertaken separately due to the distinct requirement for analysis of each one. Both tests will draw on examples related to the Directorate-General (DG) for Climate Action. This DG in particular was selected for a number of reasons. Firstly, it is a relatively new DG (established in February 2010) and it is therefore possible to select all instances of the civil society interest groups I am studying for investigation (DG Climate Action, 2011). The DG is concerned with both regulatory and distributive issues (in terms of carbon permits for example) and so spans both sides of a category cleavage in the literature (Majone, 1993). It also has clear impact on all primary sectors which typically consult; business and industry, civil society and NGO groups, and national and local governments all feature. The DG deals with both technical questions regarding industry and more normative questions which typically suit civil society organisations better. The legislative items it consults on do not obviously favour one type of group over another, which ensures the consultations will be well responded to by all sectors. As such is it provides a
snapshot of a range of issues which are representative of the type of consultation responses seen from civil society interest groups throughout the EU.

Chapter 2 of this thesis concerns Hypothesis 1, and examines the correlation between an interest group’s stated preferences and those preferences that are communicated to EU decision-makers. As such, my dependent variable will be examined in terms of the output of the interest group in the open consultation system. The system is a tool used by the Commission to solicit the views of interest groups on proposed legislation in the drafting stage. This consultation process is a central part of the legitimising element that interest groups provide the Commission and the submissions are freely accessible, and as such is an ideal subject for testing. The independent variables in this case are the stated interests of the group (as a proxy for the membership interests), obtained by examining a group’s website for information about its activities and policies.

I examine a total of 14 cases, every group fitting my criteria that responded to open consultations at the Climate Action DG. The results are presented in the form of mini-case studies, so as to enable a more detailed analysis of not just whether the various interests of the group are represented, but also in what way they are referred to. This offers a greater level of insight into the presentation of views to the Commission. Rather than a more binary question: ‘The group supports lowering of the quantity of tradable carbon permits, is this reflected in the consultation? Yes/no’, this analysis allows a real test of the theory that interest groups effectively communicate their member’s preferences. Essentially, are they doing them justice? Are some better presented than others?

Hypothesis 2 examines the correlation between the engagement of interest group members and the associational benefits accrued, and is tested in Chapter 3. To obtain the level of detail required to adequately test this hypothesis four cases have been taken, selected according to a least similar systems design (George & Bennett, 2005, p. 83). These cases have been examined in detail through a variety of data gathering methods, including primary documents of the group, ranging from online sources to policy papers produced. Interviews with staff at the interest groups have been conducted and form an integral part of the analysis, testing the theoretical contribution against the reality of group operations.
Limitations of data

Although there is sufficient data for both tests to be undertaken, there limitations to the data obtained. Some information about groups was obtained from the EU Transparency Register (Transparency Register, 2013), however registration is not compulsory so some groups were not registered, reducing the information available. Only consultation responses in English have been tested, limiting the sample. Although there is a risk of bias in this, it is limited because so many groups consult in English and groups from a range of European countries have still been tested.

Information from civil society interest group websites is used extensively in both tests, but not other supporter-facing material such as leaflets or posters. Obtaining such material would have been very difficult, and such extra effort must be weighed against the added value it would bring to the tests. Material is likely to be consistent across different mediums, and attention-grabbing posters are unlikely to have the information required on group policies, being more for promoting awareness of a group. Given that, the lack of this material does not significantly limit the test or results.

The terminology of ‘members’ and ‘supporters’ varies between groups, with some using member and some supporter for similar types of engagement, which can create difficulties when comparing cases. This was overcome by using the groups own terminology and gaining an understanding of what it meant for comparison purposes, rather than relying on the terms themselves; for example Greenpeace defines supporters as financial contributors, which is also how WWF defines members (Greenpeace EU, 2013; WWF UK, 2013).
Chapter 2: Testing the Conduit Model

2.1. Conduit Model Introduction

This chapter empirically tests the conduit model of interest groups’ contribution to democracy. The test involves comparing the output of interest groups lobbying activity in the form of submissions to the open consultation system with the group’s membership facing material as a proxy for member’s interests.

This process tests my first hypothesis, \( H_1 \): The more specific an interest group’s stated preferences, the more likely those preferences are communicated to EU decision-makers.

This analysis places the sampled cases into three categories (explained in detail below), and finds agreement that the more specific the stated preferences, the more likely they are communicated to EU decision-makers. There are several important additional findings. Groups which undertake their own research and have a more technical focus are better at representing their member’s views to the Commission. However such groups have limited appeal generally as their membership is small and typically well informed. The larger, high profile, groups exhibit a tendency to simplify their member-facing material; they focus on simplified goals rather than policy specific material, making it difficult to conclude whether these policies are endorsed by members. Finally, some groups do not present their positions clearly, making it difficult for supporters or members to make informed decisions. These groups also suffer from the use of pre-prepared documents and taking their policies from other groups, which can result in weaker open consultation submissions.

Whilst the intuition connecting the independent and dependant variables would suggest moving from interest group to consultation, the limitations of the open consultation system requires the case selection to move the other way, first selecting examples of consultations and then comparing that with the interest groups stated positions. This may lead to a selection bias, in that only organisations which have consulted can be picked. This is not a problem for my investigation however as the question is not about the range of interests represented, but rather the validity of those that are.

This test focuses on specificity as there is an established trend in the literature that specific interests are better represented than diffuse groups in the general interest group field (Pollack, 1997). There is added value to focussing this in on the civil society interest groups to further
test this notion within the context of the democratic contribution of the conduit model. The specificity of the interests stated will be examined in two forms. Firstly, on breadth of interest. The broader the range of interest the group is engaged in, the less specific its interests are. Secondly, on the depth of the objectives stated. ‘Global Justice’ is a very unspecific objective, whereas ‘a European fund to compensate non-European nations who fall victim to rising sea levels’ is a specific objective.

The rationale for developing these two measures is twofold. The first is drawn from existing conceptions of the specific – diffuse group divide in the interest group literature mentioned above. Specific groups are better able to represent their members because they have a smaller constituency which they are better able to mobilise and and represent (Beyers, 2004, p. 216). This was originally to distinguish between public interests, which aim to represent a mass of people, and producer groups, however this can easily be transposed to the civil society interest group population. The second part of the rationale draws on economic preference analysis. Aggregating a series of individual preferences into a single group preference set is most straightforward when all individuals share the same preferences. However the more individuals incorporated, and the more different the preference structures, the more likely it is mathematically impossible to integrate the individual preferences into one coherent set (Arrow, 1963). In terms of interest groups, the more diverse the interests of the group, the more difficult it is to create a coherent policy platform. This gives rise to my two categories; breadth encompasses the idea that a broader range of interests provides a larger constituency and range of preferences which is harder to represent. Similarly depth represents the idea that the more precise the interests the better they will be represented.

This is systematised by ranking each group in the sample according to the two scales. These are explained below, with a general description applicable to all policy areas another relating to DG Climate Action, which concerns the groups in this study.

*Table 1: Breadth measure*

<table>
<thead>
<tr>
<th>Label</th>
<th>General description</th>
<th>DG Climate Action-specific</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very specific</td>
<td>Focussed activity on a specific policy or small group of related policies</td>
<td>A close focus on a particular branch of environmental work</td>
</tr>
<tr>
<td>Targeted interest</td>
<td>Targeting within a category area of interest.</td>
<td>A wider focus on a branch or two of environmentalism; e.g. energy and climate</td>
</tr>
<tr>
<td>Broad interest</td>
<td>A broad approach to a category area of interest.</td>
<td>A wider reach, from climate change to wildlife, animals and ecosystems</td>
</tr>
</tbody>
</table>
Very broad | Cover a wide range of interests, with several distinct divisions | Encompassing a whole range of issues, including beyond environmental.

**Table 2: Depth measure**

<table>
<thead>
<tr>
<th>Label</th>
<th>General description</th>
<th>DG Climate Action-specific</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very detailed</td>
<td>Includes policy recommendations and extensive information</td>
<td>Analysis of environmental policies preferred, with evidence</td>
</tr>
<tr>
<td>Detailed objectives</td>
<td>Clear eventual goals desired by a group, but without clear policy suggestions</td>
<td>Objectives set out for environmental goals, but little or no policy details for implementation</td>
</tr>
<tr>
<td>Vague objectives</td>
<td>A range of vague and difficult to quantify objectives.</td>
<td>Such as ‘a better world for or children’</td>
</tr>
</tbody>
</table>

The open consultation data was taken directly from the EC “Your voice in Europe” system, which manages the open consultations (European Commission, 2013). Taking DG Climate Action consultations, I selected every civil society interest group that fits my definition (within Chapter 1.2. Theoretical Framework) from the full range of consultation documents. The full list of consultation titles, from 2010 to the time of research, is listed in Appendix 1 along with my own annotations noting whether their inclusion was applicable for completeness.

The data to determine member’s interests is the membership or supporter-facing group materials. This data has been obtained from relevant pages on the groups’ websites, as these are the most available communication between group and members. The sample of 14 cases is drawn from the full list, and is presented in a table below. Where an organisation has consulted on more than one item (such as WWF), the separate consultations will all be included in the analysis of one item in the sample, so I have a sample of 14 but have tested 23 consultation documents.

Some of the groups which have responded to DG Climate Action consultations and appear to be civil society interest groups have been excluded. The most common reason for this is that the group was a network-type organisation, such as Climate Action Network Europe; such groups are not applicable for my research as they are not the groups which connect the EC with citizens, but rather they help connect various green NGOs to enable them to campaign more effectively at an operational level by coordinating actions. As such these types of groups have been excluded from my sample. A full list of excluded organisations including the reasons for exclusion is presented in Appendix 2.
Table 3: Conduit test sample

<table>
<thead>
<tr>
<th>Consultation Title &amp; Closing Date</th>
<th>Civil Society Interest Groups</th>
<th>Sample Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation on structural options to strengthen the EU Emissions Trading System- 28/02/2013</td>
<td>Focus Association for Sustainable Development</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Greenpeace</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Quercus - Associação Nacional de Conservação da Natureza</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Sandbag</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Transparency International</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>WWF (World Wide Fund for Nature)</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>Friends of the Earth Czech Republic (FoE-CZ)</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>Hnutí DHUA (group name in Czech)</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>RE:Common and others</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>The Corner House</td>
<td>10</td>
</tr>
<tr>
<td>Consultation on review of the auction time profile for the EU Emissions Trading System - 16/10/2012</td>
<td>E3G</td>
<td>11</td>
</tr>
<tr>
<td></td>
<td>Sandbag 2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>WWF 2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Friends of the Earth Czech Republic 2</td>
<td></td>
</tr>
<tr>
<td>Reducing CO2 emissions from road vehicles - 09/12/2011</td>
<td>Greenpeace 2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>WWF 3</td>
<td></td>
</tr>
<tr>
<td>Roadmap for a low carbon economy by 2050 - 08/12/2010</td>
<td>Friends of the Earth Europe</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>WWF 4</td>
<td></td>
</tr>
</tbody>
</table>
My analysis groups the sample items into three main categories. Determined primarily by variance of the independent variable (specificity of preferences), they combine similar types of group to enable a more coherent comparison of different factors which explain the relationship between independent and dependant variables. The groups also mirror how well the groups map from member-facing material to Commission documents. The first category is ‘highly specific and congruent,’ and typically contains smaller groups with a specific working area with detailed policy objectives. The second group is ‘partially congruent and simplified,’ which mainly contains the larger trans-national groups. Here goals are specified, but are often much simplified for public consumption resulting in consultation responses which reflect the spirit of the group but not necessarily the technicalities. The third group, ‘poorly congruent,’ tends to be smaller groups again, but with a board remit and vague objectives, often with limited correlation between the website and open consultation submission.

2.2. Highly Specific and Congruent

The four groups in this category all exhibit a technical focus on policy issues, with particular goals clearly stated in the groups own materials.

Sandbag, a London based group, is simultaneously the most focused group with the most specific remit and goals, and the group whose consultation submission most closely mirrors
their online materials and stated position. The organisation deals exclusively with the issue of the European Union’s Emissions Trading Scheme (EU ETS), conducting research and campaigns for reform (Sandbag, 2013). This exhibits an unusual level of targeting of a group’s activities; Sandbag claim this is due to an ethos of “Put your effort where it makes the biggest impact” (Sandbag, 2013). This is actually quite typical of the groups in this category. Noé21, a Swiss group which is also investigated in the schools testing, focuses on particular campaigns rather than covering a large range of issues. In an interview the group coordinator described this as the “low hanging fruit” idea; identifying easy opportunities to reduce emissions, and targeting those (de Rougemont, 2013). This specificity in targets allows for a consultation that more closely mirrors group preferences.

The campaign described as ‘low hanging fruit’ relates to the carbon credit offset scheme. Within the regular operating of the EU ETS, carbon credits are issued to businesses to be ‘spent’ on carbon emissions. Under the Clean Development Mechanism (CDM) businesses can gain extra credits by paying firms in developing countries to reduce their emissions, in theory offsetting the extra emissions within the EU. However this system has been rife with abuse, and Noé21 was just one of a number of organisations to call for significant reform to this scheme. Noé21 focussed on the removal of HFC-23, a particularly potent greenhouse gas which was produced as an industrial by-product, which was being cleaned up by companies in India and China to sell as CDM credits. The profits from doing this meant that firms polluted expressly to enable them to clean up the pollution and sell that cleaning up act to European firms as CDM offset credits. These firms ended up making far more money from selling carbon offsets than they did for their original industrial processes (Wara & Victor, 2008, pp. 10-12; Carbon Market Watch, 2013). By taking such a specific campaign, Noé21 were able to report this activity to its members and supporters in detail, and its lobbying closely regards this campaign. The campaign (with the support of others) was a success; HFC-23 gasses are now excluded from the CDM (Carbon Market Watch, 2013). In its consultation submission on the proposal to exclude the gasses, Noé21 said they “strongly support that this proposal is made into a decision in the shortest time” (Noé21, 2010). This matches with their online policy calling for “the CDM HFC-23 profit be reduced in order to prevent the perverse incentive to produce more of the HFC-23” (Noé21, 2013).

This campaign was also supported by another group in the ‘highly specific and congruent’ category, the Environmental Investigation Agency (EIA), who said in their consultation that “Europe must act now to immediately ban HFC-23 credits from the EU ETS” (EIA, 2010).
This matches with their website, which now celebrates that “following EIA’s exposure of gaming in the carbon system, the European Union eventually agreed to outlaw the use of these kinds of permits” (EIA International, 2013). The only slight difference between EIA’s website and the submission is the more technical language in the submission to the open consultation, although the policy detail is present in both.

Undertaking their own research

EIA’s submission on the HFC-23 issue is rooted in their own investigative work and research, which is typical of groups within this category. Noé21 helped draft the new methodology for assessing the CDM projects regarding the gas (Noé21, 2005). Focus, a Slovenian group, provides a slightly different example; they mostly undertake research directed at the local and national level, such as environmental audits of local government, identifying areas for improvement in the use of renewable energy and encouraging implementation (Focus, 2007).

Sandbag provides a further good example of this research focus. In one of the four consultations it has responded to, ‘Response to public consultation in preparation of an analytical report on the impact of the international climate negotiations on the situation of energy intensive sectors’ (Sandbag, 2010), Sandbag argues extensively against the overuse of the carbon leakage concept, which is consistent with their website (Sandbag, 2013). It advocates a move to monitor the accumulation of surplus carbon credits by particular companies, a project it undertakes itself in some detail and actively promotes the use of on its website. The reports presented are incredibly detailed and use their own calculations, rather than relying on other NGOs work; for example a discussion on increasing the linear reduction factor\(^3\) differentiates between the demands of the power generating and industrial sectors (Sandbag, 2013).

It seems that groups which take a more active role in researching alternative approaches which they then represent to the Commission are more likely to have detailed policy objectives explained on their website, and are more likely to be true to those stated objectives when they consult the DG Climate Action.

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\(^3\) The rate at which the total number of carbon credits issued by the EU is decreased.
Membership profile

The groups share a similar membership profile in that they are all quite small, ranging from 4,000 members of EIA (Transparency Register, 2013) to only 10-12 full members and around 60 supporters at Noé21 (de Rougemont, 2013). This contrasts with the sometimes millions of members or supporters enjoyed by other groups in the sample, such as Greenpeace. This highly congruent type of group attracts a relatively informed member, and so it is possibly easier to disseminate information on the more complex issues, although Focus has a strong educative element and so has a great deal of detail on its website (Focus, 2013), which might in part explain its ability to provide technical detail. This is quite different to the second category of group below, where groups more commonly simplify the debates in Europe for their members. However the technical focus of these groups could be seen as a weakness of this category. Although the groups do a good job of educating their members, their detail may be a barrier to substantially wider membership.

The fact that the most congruent groups are smaller agrees with existing theoretical contributions from Jordan and Maloney (2007, p. 6), which suggest that a smaller group would find it easier to represent its members and develop a coherent policy platform. Although this category seems to support that statement, many of the groups in the poorly congruent category are also small, and do not well represent their members; it’s not clear that size alone is a determining factor in ability of groups to act as a conduit for their members views.

The groups in this category are small and have a focused interest remit and a depth of information; they all score either ‘very specific’ or ‘targeted interest’ on the measure of breadth, and all of them are ‘very detailed policy’ in the depth measure of the goals they seek. Their member facing website materials are highly congruent with the responses they provide to open consultations at the European Commission, due to their original research, small size and educated member-base.

2.3. Partially Congruent and Simplified

The second category of groups in the analysis contains the most widely known and largest groups. They are Greenpeace, WWF, Transparency International and Friends of the Earth. The groups in this category tend to follow the main themes of their member-facing material
in their consultations, but with more technical and policy specific recommendations not featured on their websites. The lessons learned from these groups are particularly important as this type of large group is dominant in the public sphere; Kotzian and Steffek found in a sample of 60 CSOs, three were responsible for 74% of mentions in the media (2013, p. 70).

All four of these groups have specialist offices in Brussels as well as national groups across Europe and the world. They all have a fairly broad range of concerns within the environmental banner, being categorised as ‘broad interest.’ Their assessment according to the ‘depth’ measure varies between the EU and national offices, with EU websites being classed as ‘detailed policy’ and the national offices ‘detailed objectives.’

*The European office and national group divide*

The first important result for the analysis is the difference between the website of the European offices and those of national groups. Due to language limitations I focus on the national branches in the United Kingdom in this testing. Friends of the Earth for example has information on its work and approach to combating climate change on both its UK and EU websites. In the UK, as well as speaking in broad terms about the kind of world they want, “more green energy, lower bills, and cosier homes,” the website has specific long term targets; “we need to cut CO2 emissions to a fifth of current levels by 2050. But we can't wait until 2049 and do it all overnight. By then, too much carbon will have built up in the atmosphere. Worldwide emissions must peak by 2015, then start falling.” The UK site however has no information on how such reduction would be achieved in policy terms (FoE England, Wales and Northern Ireland, 2013). Conversely the EU site has considerable policy detail and updates on current developments; “Friends of the Earth Europe is calling for three ambitious and binding targets for 2030 to cut greenhouse gas emissions, save energy and develop renewable energies” such as “a 100% renewable energy system for Europe for 2050” (FoEE, 2013).

When it comes to the submissions to the open consultations, it is the more specific and detailed information on the EU website which is matched to the document. Online: “Regulation, taxation and subsidies are more effective at delivering the scale and speed of emissions reductions necessary to avoid catastrophic climate change” (FoEE, 2013). And in the document: “...regulation, taxation and subsidies which are able to deliver the scale and speed of emissions reductions necessary to avoid catastrophic climate change” (FoEE, 2010). This is typical of groups in this category.
The national web-pages of these groups are far more aimed at members and supporters, whereas in an interview a senior staff member at FoE Europe indicated that regarding the EU office website “we identify that the target audience as much more EU decision makers” (Heller, 2013). The WWF European policy office website has no links to join, or even donate, compared to the WWF UK site which is filled with prominent requests for both (WWF EU, 2013; WWF UK, 2013).

This distinction between the EU and national offices is a probable manifestation of the theorised idea that interest groups employ outside lobbying tactics to attract members, whilst inside tactics tend to be less widely publicised (Binderkrantz, 2005), as well as the importance of outside lobbying tactics more generally (Chalmers, 2013, p. 52). All organisations mentioned feature larger actions more prominently promoted, or actions easily taken by individuals. WWF even has a prominent link on its homepage; “Our Beautiful Earth. See it. Protect it. All on your mobile” (WWF UK, 2013).

_Simplified goals for member-facing sites_

The material found on national web pages, designed for consumption by the general public and particularly members and supporters, is much more target driven; it lacks much of the information on policies such as the ETS which are central to many of the consultation documents tested.

In the case of Greenpeace this approach, where national groups have the broader long term goals and the EU office is more responsible for the detail and policy implications, can be seen in the text of one of its consultation responses. In response to the open consultation regarding the ETS auction profile, Greenpeace employs a telling structure in the presentation of its views. It highlights three criteria which inform its subsequent technical recommendations, such as “[holding] warming below two degrees Celsius” and “a cost-efficient reduction pathway towards 80-95% [emission] reductions by 2050” (Greenpeace, 2012). This is then followed by technical policy options. In an interview for this research the author confirmed that this was the format for preparation, with policy objectives agreed by various Greenpeace offices forming the basis for technical recommendations from the office (den Blanken, 2013).

The larger groups which make up this category have prioritised the more general goals of their work in the member-facing material, and use their more expert knowledge centred in
Brussels in their responses to open consultations. Kotzian and Steffek provide a useful framing of this, distinguishing between strategic level and tactical level inclusion (2013, p. 59). At the strategic level members may be involved, determining key priorities, but left out at the tactical level of policy recommendations. In this the groups embody the spirit of their members, but it is difficult to claim they are representing their member’s preferences on policy recommendations. To make a full assessment on the democratic contribution of these groups we need more information than congruence alone.

The fourth group in this category, Transparency International (TI), is a little different as it is not an environmental group. Focussing on reducing corruption, its submission to DG Climate Action is about the risks of corruption within the EU ETS. This group still exhibits the difference between EU and national websites, as the UK site makes little mention of TI’s work at the EU (Transparency International UK, 2013). The group falls within this category because of its broad concerns (broad interest) and lack of policy specificity (broad objectives).

The consultation document remains true to the group’s interests. TI-EU have consulted on the ‘structural options to strengthen the EU Emissions Trading System,’ but re-title their response “Promoting Integrity in the EU Emissions Trading Scheme” (Transparency International Liaison Office to the European Union, 2013), which exemplifies their refocusing of the consultation to deal with corruption. Every policy option is tied into the subject of corruption in some way. However unlike the other groups the vagueness present online is carried into the consultation submission. A typical point is “Transparency International recommends that the Commission is wary of options that may be susceptible to conflicts of interest and regulatory weakness” (Transparency International Liaison Office to the European Union, 2013). The web pages and consolation document match to the extent that both suggest there may be risks of corruption and they need to be mitigated against, but with such a broad scope that is unsurprising. In one sense they possibly over-reach the information from their EU website, when they both endorse the use of the ETS (not an uncontroversial assertion amongst civil society groups), and support a low cap on emissions. This is recommended to “ensure the stability of the market, as a stable market carries lower corruption risk” (Transparency International Liaison Office to the European Union, 2013), however no such policy is mentioned online, so it may well not be endorsed by Transparency International members.
Overall, the groups in this category highlight two key issues. The first is the distinction between national level and the European offices; the former is more directed at members, whereas the latter is more for EU decision makers and those within the Brussels community. The second key issue flows from this distinction. Groups tend to use more simplified information on their member facing pages, preferring to state broader goals rather than policy positions. This leaves a question mark over how well they represent member preferences with regard to the policies endorsed in consultations. The groups in this category also fit with the hypothesis tested, in that as these groups have broader interests and less detailed specific goals their consultations do not map as clearly to the member facing documents.

2.3. Poorly Congruent

This category is the most diverse, and is primarily made up of smaller organisations, with varying interests. All are categorised as ‘very broad,’ meaning they have a range of interests which expand beyond environmental concerns, but they vary according to the depth measure.

Availability of policy positions

A key difference in the depth measure between the groups in this category arises from the difference in detail between the core pages of a group and its stated position found after much searching. Re:Common is an Italian group which grew out of a previous campaign to reform the World Bank. Now it “will work to produce structural change both in finance and natural common management” (Re:Common, 2013b). This means its interests are incredibly broad, referring to widespread reform of global financial governance, management of natural resources, promotion of citizen management of policies and the “the creation of new mechanisms for the public funding of public goods” (Re:Common, 2013b). Their submission to the EC, on the open consultation, “Consultation on structural options to strengthen the EU Emissions Trading System,” calls for the ETS to be scrapped, and is based on a pre-prepared letter also signed by other groups (Re:Common, 2013a). However, online their stance on EU environmental policy is very difficult to determine. There is no mention of it in the groups manifesto, or core web pages. It is only after searching explicitly for

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4 Original Italian: “Politiche che devono facilitare la nascita di nuovi meccanismi per il finanziamento pubblico dei beni comuni a livello nazionale e globale.”
‘ETS’ that you can find a news update which refers to their opposition to the ETS (Re:Common, 2013b). The consultation document they supply is congruent in its opposition to the ETS, but is filled with detail not present on the groups own site.

E3G, a British group, has a remarkably vague remit. The core introductory pages speak in extremely broad terms; “We build coalitions to achieve carefully defined outcomes, chosen for their capacity to leverage change,” and “E3G makes things happen. We work to deliver outcomes with strategic significance for the transition to sustainable development” (E3G, 2013). However it is difficult to determine what exactly this involves. Much like Re:Common, further detail can be obtained by searching opinion articles which appear in news type posts. However it is not coherently presented, and it is not very clear what the groups polices are on the issue they have twice consulted on, the EU ETS. In one consultation response, E3G strongly opposes “the flawed concept of ‘carbon leakage’” (E3G, 2010). However searching online it only mentions carbon leakage twice in the entire site, once in passing, and in one article from 2009 where it criticises the EU for not providing “detailed measures to address carbon leakage and competitiveness impacts,” suggesting it supports the use of the concept (E3G, 2013). For both E3G and Re:Common, although there is some congruence it is erratic, and significantly it is difficult for supporters to see clearly what the view of the group is. In my research design I assume that members can be said to support policies of groups if the policy is available on member facing websites. However this does not follow where material is buried in news articles nor mentioned in passing across a number of web pages; members need to be able to find a group’s policies to endorse them.

*The copy-paste consultation*

The second phenomenon highlighted by this ‘poorly congruent’ category is that of the tendency of groups to match policies, signing up to a pre-prepared letter. This is the case for Re:Common which, as I have already described, lead it to represent views to the Commission which seem distinct from its primary group objectives for financial reform. It can be seen even more clearly in the submissions of the other two groups in this category, The Corner House and the Transnational Institute. These two groups have independently submitted almost identical submissions, with key paragraphs and demands reproduced exactly. In the case of these groups there is a good level of congruence between their online stance and that of the consultation, due to their posting online of a report authored by a number of small
groups in conjunction which explains the opposition to the ETS (The Transnational Institute, 2013b; The Corner House, 2013b).

However the copy-paste type consultation document reduces the quality of the representation made to the Commission. In its consultation The Transnational Institute has as the last character in its title a “1,” a number originally designed to designate a footnote, but with no corresponding reference (The Transnational Institute, 2013a). On The Corner House submission the reference remains (The Corner House, 2013a). Although only a typographical and referencing error, it represents limited care taken in the submission and could cause the groups views to be taken less seriously.

The groups in this category highlight two phenomenon. The first is that some groups are not clear about their positions, and sometimes have policy information buried within their website. This reduces the ability of supporters to make informed decisions about their support for groups’ activities. The second is that the broad interests can cause a group to be reliant on generically created policy positions, which can result in weaker representations to the Commission.

2.5. Conduit Model Conclusion

The three categories used in the analysis have each drawn out some key features about the empirical applicability of the conduit model. The ‘very detailed and congruent’ category showed the strength of targeted, specialist groups in conducting research and representing their members to the Commission through the open consultation system. The ‘partially congruent and simplified’ category, home to the largest and most known environmental interest groups, demonstrated the divergence of the technically focussed European offices in contrast to the simplified, member focussed national branches. The final group, ‘poorly congruent,’ highlighted how interrelated such groups can be, and how some groups do not make their positions clear or easily accessible, which calls into question how well members are informed of them.

There are two groups of the sample of 14 not yet mentioned, which are typified as outliers. The first, Quercus, was excluded because its website is currently undergoing maintenance (and has been for the duration of the testing). This means it is difficult to determine the
group’s policies or make a fair assessment of its member-facing material. As such it has not been included in the test.

The second group is Friends of the Earth Czech Republic, which did not fit into any of the three categories. This group consulted on the subject of the EU ETS in two separate documents. The group advocates detailed policies, such as the “retirement of 2.2 billion allowances” from the scheme (FoE Czech Republic, 2013). However, the Emissions Trading Scheme is not mentioned anywhere in the organisation’s website, nor is there any indication of any lobbying undertaken at the EU level (Hnutí DUHA - FoE CZ, 2013)\(^5\). The recommendations the group makes are similar to other civil society interest groups who have consulted such as Greenpeace and Sandbag, with the key figures of retiring 2.2bn credits, increasing the linear reduction factor to 2.6% and “increasing the EU reduction target to 30% in 2020” (FoE Czech Republic, 2013). However none of this appears anywhere on its website, so we cannot say they are representing their members.

This case, along with examples throughout this analysis, highlights a problem with the conduit model. It is difficult to know to what extent the open consultation submissions are truly representative. In the ‘partially congruent and simplified’ category containing the major environmental NGOs, the group submissions were in the spirit of their objectives, and the key headline targets where congruent between member-facing materials and the consultation document. We can reasonably conclude that the members endorse these aims following the logic that they would exit the group otherwise (Maloney, 2009, pp. 283-4). We cannot similarly assume members endorse the specific policy objectives which do not feature in the member-facing national group pages. However it would be overstretching to say they are the sort of things which members would disagree with. On the basis of the evidence gathered, it is not clear whether members would or would not support the policies. We cannot use the justification of the exit option, the idea that members tacitly support a group’s position because if not they would leave, because the detail of many of the policies is not made readily available to them.

Another conclusion which can be drawn from the analysis is the tendency for groups to coalesce around particular policies, and cite each other in their analysis. Across the three categories the incidence of this increases, suggesting that groups with broader interests are more reliant on information provided by others within the interest group community. Such

\(^5\) Hnutí DUHA is the Czech name of the group, and the name under which its website is listed
cross-citing does occur at all levels however. For example Friends the Earth Europe cites Sandbag research (FoEE, 2010) and WWF cites work by Climate Action Network Europe (WWF European Policy Office, 2013). Smaller groups with a broad set of interests, those in the ‘poorly congruent’ category, appear more likely to sign up to generally available policy positions rather than develop their own. The prime example from this research is the near-identical submissions from The Corner House and the Transnational Institute (The Corner House, 2013a; The Transnational Institute, 2013a). This homogeneity could be framed in terms of the professionalization of the European interest groups population as policy positions are agreed between group professionals.
Chapter 3: Testing the Schools Model

3.1. Schools Model Introduction

This chapter focuses on the testing of the schools model. This is part two of my research design, considering the associative benefits provided by civil society interest groups with a smaller sub-sample investigated in more depth. Here I am testing my second hypothesis. 

\[ H2: \] The more interest groups engage their members, the more associational democratic benefits are accrued.

This chapter considers both what opportunities there are for members to be involved in the group, and what is actually observed in practice. The analysis is organised according to three core ideas within the schools of democracy theory. After explaining the sample and introducing the four groups, in Section 3.2 I look first at the group structures and internal democracy, also addressing the important question of the role of limited financial participation. Then in Section 3.3 I focus on the relevance of abstraction from members and the role of local groups for building associative benefits. Section 3.4 deals with communicative issues; I stress the importance of informing members and supporters, and examine the role of groups in socialising citizens to European affairs. In the conclusion to this chapter I move to connect the empirical test to theoretical issues, including the importance of creating a public forum for deliberative democracy and cross border linkages. I end by noting the lack of supporter demand for more engagement.

I find that the groups tested only conform to the schools model in a limited sense, with some informing of members and socialisation, and some positive examples of local engagement and face-to-face associative activity. However these positives are very patchy across groups, and large numbers of members have very limited involvement. The smaller two groups fare better, with more involvement in decisions and greater associative benefits. Larger groups reach a larger audience and influence the public discourse far more, but offer less engagement for members and suffer from an abstraction from their supporters.

As per my research design I have chosen a sample of four based on a least similar selection to vary my coverage of the types of group. I have chosen two large international groups, Friends of the Earth Europe and Greenpeace, and two small national groups, Noé21 in Switzerland and Focus: Association for Sustainable development (Focus) in Slovenia. These
groups all fall within my definition of supporter-member based civil society interest groups, and as such are all candidates for the associative benefits central to the schools of democracy theory I am investigating. I have conducted interviews with all groups as well as using the groups’ websites and published documents in conjunction with existing empirical work and literature which examines groups like these and the contexts surrounding them.

Introducing the sample

The first two groups in the sample are large, high profile international groups; Friends of the Earth Europe and Greenpeace. Friends of the Earth Europe is the Brussels branch of the Friends of the Earth global network, and acts as an umbrella group sitting on top of the national FoE offices in European countries (FoEE, 2013). Individual citizens are members of national groups, and membership involves a regular payment. Organisationally, Greenpeace has a significantly different structure to FoEE; rather than the European Unit sitting as an umbrella for the national European groups, it rests separately. In terms of staff this is manifested in the lack of anyone responsible for coordinating work across the national offices (Greenpeace EU, 2013). Greenpeace does not have ‘members’ but rather ‘supporters’ which are defined in the same way as FoEE, as regular financial contributors (den Blanken, 2013), which number some 2.8 million worldwide (Greenpeace EU, 2013).

The other two groups in the sample are small national groups, which still lobby at the European level. Noé21 is based in Geneva and Focus in Ljubljana, Slovenia. They both employ a similar structure with a small number of formal members and a larger number of supporters with less ties to the groups. The Noé21 interviewee put the membership number at 12, whilst he claimed about 60 active supporters (although some group activity sees more involvement) (de Rougemont, 2013). Focus has a formal membership of 86 (Transparency Register, 2013), although it routinely includes non-members in its activities and its wider supporter base is around 300 (Kvac, 2013). Noé21 has a technical focus, and the majority of staff members are professionals such as engineers or geologists, with the group also engaging in energy efficiency consultancy (Noé21, 2013; de Rougemont, 2013). As well as lobbying, Focus engages in local conservation work and has a strong educative activity programme (Kvac, 2013; Focus, 2013).

Next I examine these groups and the schools of democracy model in three sections organised around the core ideas of the schools thesis identified in the introduction.
3.2. Organisational Structure and Member Participation

The organisational issues which impact on the associational benefits are manifold. First is the internal democracy of the organisation, through representative bodies and committees, or direct member involvement. Second I address the important question of financial and individualised participation.

Member involvement in decision making

The two larger groups in the sample, with Brussels based offices, employ a similar structure with a key democratic distinction. They both have a longer term strategy, decided in conjunction with the national groups in their respective organisations. According to the interviewees this is a genuinely collaborative process. A senior Network Officer at FoEE: “It’s not that the office drafts it and we just send it for consultation to the member groups, it’s really developed from the wishes and desires and plans of the network of member groups” (Heller, 2013). Similarly Greenpeace follows a yearly programme for its European office, designed in conjunction with representatives of national offices (den Blanken, 2013). However it is not clear that this acts as a member-based direction of the organisations, because in the hierarchically organised Greenpeace the national offices are represented by national staff. FoEE comes closer to internal democracy, because its structure of local groups allows for national groups to have some representative function. In FoE in the UK for example the board is partly comprised of elected members (FoE England, Wales and Northern Ireland, 2013); this suggests the longer term plan is more likely to embody the voice of members rather than just professional-level staff. However as I discuss in Section 3.3 below, determining how many members are engaged in local activity (in this case group elections) can be difficult. Although its structure is similar at the European level, the lack of representation in national groups and the hierarchical structure mean Greenpeace lacks internal democracy (Grant, 2002, p. 5). However both of these groups have a very limited role for members at the operational and technical level. This is a feature of the organisational structure which has the EU operations undertaken in an office which does not link directly to members, but relies on national groups to mediate that link. In Greenpeace, “professionally speaking there is not much interaction” with supporters who are not staff (den Blanken, 2013).

The smaller groups both exhibit a more inclusive decision-making structure, enabling more regular contact between staff and members. The interviewee from Noé21 remarked that this
was simply a part of the group’s culture, where “decisions are taken quite horizontally” (de Rougemont, 2013). This factor can be difficult to generalise about across groups, with the Noé21 website and interviewee pointing to the Swiss culture as an influencing factor in the groups consensus decision making tradition (Noé21, 2013; de Rougemont, 2013). Within Focus there are significant associational benefits, with group social events and far more regular mixing of staff and members than the larger groups, as well as regular member involvement in decision making meetings (Kvac, 2013). In both Focus and Noé21 members and supporters meet regularly, even weekly in the case of Noé21. This included the face-to-face contact much touted as an important part of the schools model (Jordan & Maloney, 2007, p. 147).

Financial supporters and limited involvement

A challenge with this test is the categorisation of distinct forms of participation, most specifically financial contribution. As Jordan frames it, “are financial contributors meaningful participants?” (2012, p. 97). The approach of the groups in this area varies considerably, and is dependent on the role which members play as financial supporters. For Noé21, which have been historically reliant on a single wealthy benefactor, financial contribution has not been a goal and the senior interviewee was positive about the implications of this; “[it] means we have a very relaxed and direct, easier relationship with our base because there is no money involved” (de Rougemont, 2013). Greenpeace conversely accepts no money from governments or the EU and is reliant of member contributions and donations for almost all its funding (den Blanken, 2013). Their definition of ‘supporter’ is someone who contributes financially, and so these contributors are an important participant, in contrast with to Noé21 where member involvement is not necessarily financial. In the context of the schools model, the associational benefits are viewed as dependant on the interaction which is not simply financial. Although FoEE highlighted that local groups sometimes choose to engage in a contact with a donor, perhaps with “an annual phone call” (Heller, 2013), this level of participation is very limited, and doesn’t constitute associational group activity.

However Jordan and Maloney point out that the view of large groups having supporters which are only financial supporters can be overstated. “For various reasons, the group strategy is likely to welcome some kind of member involvement... but the idea that many groups operate a bottom up democratic agenda is unlikely” (Jordan & Maloney, 2007, p. 159,
origional emphasis). This is consistent with the evidence from Greenpeace, which highlighted how between the very involved activists and the purely chequebook participants there are many who are involved in “communicative actions, petitions, targeting politicians” and so on (den Blanken, 2013). However this has limited associational benefit, as it does not involve mixing with other members, nor constitute a feedback mechanism for group activity.

Although the member involvement is a part of the smaller groups organisational structures, they will also find it naturally easier to include members due to their substantially smaller size. To this extent, small is beautiful. However it does contrast with the European Commission’s tendency to favour groups with a transnational appeal; The EC has historically focussed more on what Borragán & Smismans class as “system representativeness” rather than “organizational representativeness” (2012, p. 404). This means a priority for organisations encompassing a larger number of EU member states and population so that the consultations cover a wider range of people, as opposed to organisational representativeness which relates to how a group represents the members it has. This has lead to a preference from the EC for larger, transnational groups (Kohler-Koch & Finke, 2007, p. 208; Greenwood, 2007, p. 193). For many members and supporters these groups lack the internal democracy and interaction that the schools model requires.

3.3. Local Groups and Proximity to Members

In the previous section the smaller groups tended to do better at engaging members in decision making in the group. In this section I go further to look at the importance of proximity to members and local activities undertaken by groups more generally.

Although the European level office has very limited involvement with members, FoEE is only part of a network of national and local groups. These local groups are generally assumed to be more conducive to participation, but previous empirical evidence considering other groups has been patchy (Lowe, et al., 2001, p. 93). The coverage of these local groups within the FoE network is variable, and dependant on the historical growth of the group. In Germany and the UK, groups are an important part of FoE’s identity and are widespread. In Austria conversely, there are no local groups despite a large membership (Heller, 2013). However it can be difficult to make an accurate estimation of the size and importance of these local groups. Terminology is one problem, especially when comparing groups; how active
do you need to be an active member (Halpin & Jordan, 2012, pp. 1-2)? Making an assessment of local activity for groups is challenging, and requires substantial long term research activity to be effective (van Deth & Maloney, 2012, pp. 241-2). For the purposes of this thesis, Roots estimates FoE local groups in the UK’s “membership is in aggregate only about 10 per cent that of the national FoE organisation” (Rootes, 2012, p. 52). Greenpeace reaches even less people locally, and “makes no pretence of being a grassroots membership organisation” (Rootes, 2012, p. 49).

There was more evidence found of wider associational benefits from the work smaller groups in the sample undertook. Sometimes this was more informal, such as Noé21’s “Café Politique or Café Scientifique,” public events where a staff member or informed supporter gives a short talk in a bar or restaurant about an environmental topic of interest, followed by extended discussion and debate (de Rougemont, 2013). This is a perfect example of the type of associational activity that generates benefits under the schools model; it educates supporters, helps them develop and form opinions, and involves interactions which connect them to others. Focus took part in Project Achieve, which offered free energy saving consultations for homeowners in the local area (Focus, 2013). This included educative benefits as well as face-to-face contact.

Care must be taken with this analysis to avoid a bias towards small groups. Due to the data being drawn from the senior level, there is a tendency to take the examples provided in smaller groups and the lack of examples from larger groups and conclude that the larger groups are weaker under the model. However this is not necessarily the case. Whilst an interviewee from Focus can outline how members regularly come to social events held in the office, the staff member from Friends of the Earth Europe cannot give definitive examples of what local groups are undertaking which might constitute associative benefits; this does not mean that FoE local groups do not have those activities and benefits. What we can say however is that considerable numbers of members of FoE are not active in local groups, and so are not receiving benefits from them (Rootes, 2012, p. 52).

This also highlights an additional issue faced by larger international groups that smaller groups do not suffer from; the considerable level of abstraction between staff at the European level and members or supporters. This has been a challenge for this research, as European office staff struggle to definitively answer questions relating to the activities of the membership. Members to not get the opportunity to mix with the European professional
level of the groups, but are reliant on national offices to represent them to that level. This is something which the smaller groups do not have. Focus, for example, has volunteer members working on an ad hoc basis in their office (Kvac, 2013). These members are exposed to the political work of Focus, without needed to become a professional political operative. This would suggest that small groups work more effectively as schools of political operation at least.

3.4. Group Communication: Informing and Socialising Members

Whilst the local activities may be limited, I now consider the communicative factors which contribute to the schools model, including the issue of European socialisation. First I look at the way groups inform their members about developments and news from the European Level, and then consider the socialising influence of groups.

Communication with members

Communication between a group and its members and supporters is essential for the associative benefits generated according to the schools model, and indeed for consensual democracy (Kohler-Koch & Finke, 2007, p. 213). Within Europe the role of interest groups in informing members and supporters about the goings-on and engaging them on key issues are especially important in light of the reality that existing media offers limited coverage to issues relating to the European Union, and in particular tends not to articulate the role of the Commission in the policy making process (Bijsmans & Altides, 2007, pp. 337-8). Interest groups could, in theory, help provide this function; indeed the EC wants them to fulfil that role. The two large organisations in the sample cast a significantly wider net in terms of communication and have far more influence on the public debate; it is common for larger groups to dominate news coverage in the field civil society organisations (Kotzian & Steffek, 2013, p. 70). Both interviewees from the larger groups identified the importance of informing members about the ongoing activities in Brussels, but identified that they are normally reliant on national groups to disseminate that message (den Blanken, 2013; Heller, 2013). A senior Greenpeace Policy Officer identifies the newsletters sent out by national groups, saying these “regularly cover political developments... but of course from my point of view that could be more” (den Blanken, 2013).
This reliance on the national offices for informing members can result in patchy coverage. My testing of the conduit model in Chapter 2 identified the examples of Friends of the Earth in the UK and the Czech Republic; the UK national website had a number of news items about European developments (FoE England, Wales and Northern Ireland, 2013), but the Czech national group was very locally focused, with no mention of anything at the EU level at all (Hnutí DUHA - FoE CZ, 2013).

Smaller groups by contrast do not get anywhere near the same levels of media coverage, although Focus actually identifies its column inches as a operational target in its annual report, and has an “operational communication plan” for reaching more people (Focus, 2013), demonstrating that even smaller groups still view making a public impact as an important feature of their operations. Informing members about climate change broadly was a particular goal of the group earlier on in the group’s life: “climate change back then, nobody knew what it was, so this was also the reason we did a lot of this training and education seminars” (Kvac, 2013). Now there is a wider awareness of the subject this is less important.

In this we can see how informing members is more about the group’s interests rather than the EU policy making process at large, although the interviewee also identified that there is a greater understanding of “the EU and what it brings” amongst the youth (Kvac, 2013). Noé21 also have a programme for education, but it is targeted at schools and teachers and is primarily about climate and energy issues such as “phasing out nuclear power in Switzerland” rather than on European affairs (de Rougemont, 2013).

The proximity to members makes it easier for smaller groups to communicate directly, with Focus identifying that larger organisations will be more detached from the local issues (Kvac, 2013). The FoEE interviewee introduced the concept of the national language; “You might phrase it in terms of the democratic deficit, but it’s also a kind of distance and language, not just national language but the kind of discourse you use is very different” (Heller, 2013). FoEE uses national groups to convey their messages as they are more in tune with the local discourse, but abstraction can result in mixed results, as we saw comparing FoE UK and Czech Republic. It seems the smaller groups do gain from the proximity of professional staff and members, because it allows for a shorter distance for news to travel. However larger groups still reach more people, and better reach the wider public, although coverage is patchy.
The Friends of the Earth Europe interviewee raises an important point from the group’s perspective. Referring to transmitting information about EU affairs to members, he notes “there is a limit to that both in what is possible but also in what is desirable, because there is so much other stuff going on around Europe... We can’t achieve change only by changing the EU institutions” (Heller, 2013). They recognise that informing members about the EU is important, but that it is only a part of the wider goal of these groups.

This plays into the way all groups discuss informing their members about European level news and activities. All identified the importance both of keeping members and supporters informed about the group’s activities in Europe and wider developments, but it was identified in a primarily functional way. Focus referred to making members understand that “our environment policies are not any more in the sole domain of our government and our decision makers” to ensure their efforts are effectively targeted at the EU (Kvac, 2013). Similarly at Greenpeace the interviewee explained the importance of the Council of Europe, and that influence was best exerted there through national governments, so “we need our national offices and supporters to really have pressure on the government on this for example, so it’s crucial we inform them about developments in Brussels” (den Blanken, 2013).

European socialisation

As might be expected based on the findings so far, the impact of these groups on the socialisation aspect of the schools model is similarly variable. Socialisation focuses on the role groups play in making citizens feel closer to Europe and be more active in European level issues. It benefits European democracy by increasing legitimacy through citizen “engagement... and mutual solidarity” (Warleigh, 2001, p. 620). This element of the model has particular resonance when considering the wider issue of the deliberative democratic contribution of interest groups to the European Union, as a common feature of the democratic deficit idea is the lack of a European public discourse. There is also a notion that socialisation through groups “develops trust and identification with EU and European institutions (Saurugger, 2012, p. 71). The lack of information on individual members in this data makes determining whether or not that is the case a difficult question to answer; I focus on the groups’ view of this, as well as drawing on existing empirical evidence.

None of the groups identified a particular desire to generate trust, and some took pains to make clear they were often critical of the European institutions. Focus highlighted the importance of “pointing out where the EU is not ambitious enough, making wrong
decisions,” (Kvac, 2013). Greenpeace identified the fact that it does “not accept [subsidy] from the European Commission... and as such we are free to say what we want about the EU and European Commission” (den Blanken, 2013). This chimes with Caiani and Ferrer-Fons (2010), who found that group membership did not necessarily create pro-Europeans, but also Eurosceptics, although it did result in more engagement in general.

The view shared by all groups that it was important to educate members about the EU, even if for primarily practical reasons of better mobilising support, is in contrast to Warleigh’s (2001, p. 623) study, which found groups made “little or no effort to educate supporters about the need for engagement with EU decision makers.” This different result could mean that over the last decade NGOs are taking on more of the role of communicating the importance of the EU. Alternatively, Warleigh focuses on development NGOs as opposed to the environmental ones in this thesis. Environmental policy is increasingly the preserve of European institutions; Focus identified that national politicians are progressively more conscious of that the EU is doing in the field (Kvac, 2013). The finding that groups do aim to educate supporters seems to be a response to this, which may explain the variation with Warleigh’s result. A Policy Officer at Greenpeace noted that “strategically we want to be a player in the European policy making, that’s why we have an office here” (den Blanken, 2013). Groups are active in Europe because that is where the action is; whilst that is the case some socialisation will occur, but it will be based on awareness and not necessarily support.

3.5. Schools Model Conclusion

In this conclusion I extend the discussion of the schools of democracy model to the discussion of deliberative democracy, noting the importance of these ideas for a deliberative model of interest groups. I then identify the inability of these groups to create international citizen linkages and the limits placed on group associational activity by a lack of supporter demand.

A European public space

Within the European context, the talk of socialisation is a feature of the existing theoretical idea that democracy requires a demos, a collective identity that binds a citizenry to the decisions taken (Dahl, 1999, pp. 22-3). This gives it significant importance for the schools
model, and any theory to improve European democracy. By this account, the European Union would require a sense of being a European citizen in order to truly militate against the democratic deficit: “The democratization of international governance will ultimately depend on the development of an appropriate transnational public sphere” (Steffek & Nanz, 2008, p. 6).

This links with the tradition of deliberative democratic theory, where many authors highlight the need for a public space in which deliberation can occur, particularly Jürgen Habermas (Bohman & Rehg, 2011; Sudbery, 2003, pp. 80-2). This deliberation improves policy outcomes, and is also a way of helping citizens form their own preferences with greater information and discussion. Deliberative interest group theory suggests that process could take place within associational groups, which opens the possibility for new preference structures and therefore new ways to resolve conflict and reach consensus (Mansbridge, 1992). This need not entail a move from a national to international demos; Weiler argues one does not negate the other, and it is possible for an additional demos to be created at the European level which citizens feel part of in tandem with their national affiliations (Weiler, 1991, p. 433). However the groups interviewed showed no sign of intentionally causing that, with the interviewee from Friends of the Earth saying “I don’t think there is such a thing an EU citizenry if that’s the right word, partly because of the incredibly different political, linguistic, cultural diversity within the region” (Heller, 2013).

International linkages

The Commission favours building “transnational networks” (Kohler-Koch & Finke, 2007, p. 208), but it is not clear that interests groups do create these international linkages, partly because it is not within their remit, but also due to organisational factors. Within this thesis, Noé21 and Focus are both national groups which do not give their members much opportunity to mix with other nationalities. Even the international groups, Greenpeace and FoEE, do not do this for anyone other than the professional level. The groups are organised along national lines, and members and supporters deal with the national offices, with no mediation with the European level group, which is the preserve of national staff and a small number of very committed activists. Given all this there is little evidence that civil society interest groups are creating international linkages between citizens. The best that can be said is that they make their members more aware of the European Union and its importance by helping to redirect public debate towards these issues.
Member and supporter demand-side interest

Based on this chapter so far, it seems group offer relatively limited associative benefits under the schools model. However this is not simply a feature of groups; Maloney identifies the importance of demand-side factors in assessing associational activity. Do members really want to be involved? “It is important to stress that participation rights are not being denied to frustrated members” (Maloney, 2009, pp. 279-80). Survey work in the 1990’s (including of FoE members in the UK) suggests members are happy to remain passive (Maloney, 2012, p. 88), and interviews with staff at a large British environmental group confirmed they were cautious about asking too much of their members: “the whole task (of recruiting people) has to be geared around saying ’oh don’t worry, we’re not expecting you to come to meetings and things, we just want your support’” (Jordan & Maloney, 2007, p. 159). Grant points to the example of a British farming group: “for those with the time and inclination, there are many committee slots to fill...” (2002, p. 6), demonstrating that perhaps the lack of associational activity in some groups is partly due to the lack of interest amongst members.

Within my sample this was partly addressed by the interviewee from Focus, a group which has significant student support which can tail off after graduation. “…after a while when they move on with their lives they kind of don’t find the time or motivation to do this actively anymore,” indicating that whilst students have the time to form an active part, older members typically want to take a more back seat role, and can give up their voting rights in general meetings (Kvac, 2013). Greenpeace identified the targeting of supporters with information provided, focussing on aspects of the organisation which an individual had been active in before.

“...some people are more interested in ocean protection, some more interested in energy issues, so you don’t want to bother them with information they are not interested in, because it would only decrease the chances of them being actively involved or giving donations to Greenpeace” (den Blanken, 2013).

Groups are often perfectly aware of the limits of member interest, and cater their activity accordingly. The reality of member demand for involvement must be considered before being too critical of the professionalised interest group community.

Limitations of method
In testing the schools model using this research design, I demonstrate what civil society interest groups offer in potential associational benefits. The data I have collected is not evidence for a change in individuals, such as the building of social capital, civil mindedness, or democratic values. To obtain such information would require a much more lengthy study which communicated directly to citizens over a period of time, to see if such benefits were really gained through their membership of a group (although such a design would not be without limitations). The data in this study, which is primarily concerned with the processes by which citizens may engage as part of the group membership and support, as well as elite perspectives from within the organisation, can only tell us the possibility of association, its likelihood, and allow us to make an educated assessment of the probability of civic values being incubated.

This chapter has examined the schools of democracy model of interest group activity using a sample of four groups. Examining group organisation and internal democracy, I determined that the two larger groups have limited supporter involvement in decision making, whilst the smaller groups involved much freer mixing of professional staff and members, resulting in much more supporter say in group activities. Turning to local groups, I found although there is a good theoretical basis for their merit under the model, their coverage is patchy and limited in the case of FoE, and almost non-existent in the case of Greenpeace. The smaller groups engage the members they have extensively, and accrue associational benefits as a result, but still reach far fewer people than the larger groups. Its not clear how well the smaller groups model could be scaled up into larger groups.

Communicative issues are critical for the schools of democracy model, with information being key for developing members. Again, larger groups reach more individuals, but the organisational distance between members and European office staff result in mixed outcomes, whereas smaller groups do not suffer from this. Incorporating existing studies with my own analysis, I found socialisation in groups does not occur to the extent that theory would suggest, but that members are still made more aware of European affairs. Linking this to theoretical matters in political theory, I highlighted the importance of the creation of a public space for deliberation, and demonstrated how international linkages between citizens have not been forged. Finally I note the limits of supporter demand for associational activity.
This test finds European interest groups go some way in providing associational benefits to interested citizens along the lines of the schools model; however they stop short of what is desired or theoretically posited. Smaller groups measure up better than larger groups, but only reach a very limited number of citizens. This test also demonstrates some of the limitations of the schools model for accounting for the contribution of interest groups to democracy. Whilst the subject of member involvement in group direction is incorporated, there is no addressing of group output or representation to decision makers external to the groups. Although in my analysis I have extended the issue of communication and socialisation to the debate about public spaces in deliberative democracy, this model does not incorporate the role of the European Commission as an institutional interlocutor for group lobbying activity, which is an essential part of their work, as well as a likely reason for many members joining. For these reasons this model is deficient without a counterpoint to address these issues. I continue this discussion in the final chapter of this thesis.
Chapter 4: Combining the Models

Having completed two distinct tests on the two primary theories of the contribution of civil society interest groups to democracy, I now examine the implications of the analysis for the underpinning of both theories. I argue that each theory fails in its contribution to explaining the democratic contribution of these groups. They each have something to offer, but we must cease to perceive them as separate theories in the European Union context, and indeed in the wider context of international organisations. Nether theory adequately accounts for the contribution, and both have empirical failings as an explanatory force. This chapter aims to strengthen the theoretical basis for interest groups and democracy by combining both models into a more coherent explanation of what we believe interest groups do, which in turn allows for a more comprehensive and intelligent empirical examination of such groups.

The conduit model was subject to testing in Chapter 2 of this thesis. Overall support was found for the hypothesis that the more specific a groups stated preferences, the more likely those preferences are communicated to EU decision-makers. Organising the sample into three categories illustrated this trend, with some variance. However the analysis highlighted two essential problems with the model. The first is the challenge of understanding how much groups really represent their members in the absence of adequate information about group policies. The examples of the larger groups, where member-facing national group material was simplified and focussed on the basic objectives of lowering greenhouse gas emissions, rather than policy discussions, means that we cannot say whether members endorse these policies. Without further looking at internal democracy, and better understanding how groups respond to member concerns internally, the model cannot tell us how well citizen preferences are communicated to the European Commission.

The second key finding is the trend of professionalization in the field. The trend is well noted in the literature, but so far its full effect is not understood (Saurugger, 2012; Maloney, 2012). The tendency of groups to homogenise their responses, the coordination between groups, and the reliance on each other’s research shows many of the groups outputs are being formed at a high level, away from ordinary members. This does not necessarily mean that these views do not represent members, but the model leaves open the possibility that much interest group activity is the preserve of professionals and elite activists who dominate the agenda.
The test of the schools of democracy model in Chapter 3 found that the associational benefit of membership of a group can be limited, with some substantial benefits to be had but a very patchy coverage, and many members having relatively little involvement in a group. The analysis highlighted three important findings from the testing of the model.

First, whilst internal democracy and member involvement in decision making is addressed, the model falls short of examining what this means for the groups’ activities. For the groups tested lobbying is an integral part of their identity, but the schools model makes limited comment on the groups relationship with its decision making interlocutor. The importance of communication and socialisation was also emphasised by the work on the schools model, both in empirical and theoretical terms. Groups saw communication and informing members as important, but primarily as a functional activity in obtaining better results for their respective causes. Theoretical accounts highlighted the importance of the European public space for deliberation, and socialising citizens toward an understanding of European issues. This links back to the origins of the democratic deficit. Weiler claims “the legitimacy crisis does not derive principally from the accountability issue at the European level but from the very redefinition of the European polity” (1991, p. 421). By this account the requirement for a European demos is vital for the democratic functioning of the EU (Sudbery, 2003, pp. 81-2). As such any account of the democratic functioning of interest groups must feature the communicative role of groups in introducing and socialising members and supporters to Europe.

Finally the schools testing drew out the need to consider member demand for associational activity. It was highlighted how most members of larger groups are fairly inactive or are involved in only individual communicative actions such as petition signing, and that many local groups are small and have plenty of opportunity for members to get involved. That members of larger groups routinely choose such limited involvement is important, and an account of civil society interest groups must consider this.

It is clear that neither one model offers enough to explain the role of civil society interest groups in connecting European institutions and citizens. Considering both models, but individually, will also not suffice. It is not simply the case that groups deal both with associational benefits as schools of democracy and transmitting citizen views to the EU as independent acts. I argue that the two activities are inexorably linked, and connected
thinking is required to coherently assess the role of these groups in militating against the democratic deficit.

This leaves us with a two-sided model of civil society interest groups; one side facing the European institutions, the other facing members. This allows for an assessment of how groups engage with both simultaneously. It will also enable us to better address two final observations which have arisen from the empirical testing.

The first relates to the question of group legitimacy. When responding to open consultations, what feature of a group means what that group says is important? The number of people they represent? The diversity of those people? The strength of the argument they make? It is not entirely clear. To some extent this depends on the notion of democracy addressed; output ideas suggest the importance of a group is its role in producing a superior outcome, perhaps through expert knowledge. Input notions of democracy imply speaking for members is the essential component of a group’s legitimacy (van Schendelen, 2010, ch. 8). Kotzian and Steffek note the widespread view that “members matter” (2013, p. 56). Members confer a degree of legitimacy on a group, as well as helping it function as a connector between citizens and institutions. However they find that member CSOs do not differ “in their political behaviour” from non-member CSOs (2013, p. 55).

The groups interviewed for the schools model testing in chapter 3 of this thesis differ in their own view of this. Greenpeace responded with a variety of reasons, claiming the strength of their lobbying came from a “combination of expertise, visibility, such as media, support base, and the moral arguments” (den Blanken, 2013). Focus was more explicit: “arguments” (Kvac, 2013). For the groups themselves, their legitimacy seems to stem more from the strength of their arguments then being the voice of the members.

The second of the final observations is the disjunction between what we hope and officially say civil society interest groups contribute to representing members and supporters, and how much we admit they do so in reality. The Commission communication on consultation standards states that:

“Openness and accountability are thus important principles for the conduct of organisations when they are seeking to contribute to EU policy development. It must be apparent:
• which interests they represent
• how inclusive that representation is” (European Commission, 2002, p. 17)

As requested in the communication, groups have to identify who they represent, which leads groups to include a statement of such in their responses to open consultations. Greenpeace does this in a recent contribution: “Greenpeace speaks for more than two million supporters worldwide” (Greenpeace, 2012, p. 1). However in an interview a Greenpeace Policy Director said: “I don’t think that we speak on behalf of those supporters, but the fact that so many people are supporting Greenpeace shows that we have a lot of support and shows that we are a key player in the debate” (den Blanken, 2013). The official guidance and that written contribution suggest that groups speak for their members or supporters. In actuality we need to be more realistic about the limitations of groups ability to represent their supporters.

A two-sided model incorporating the key features of both conduit and schools models will better address questions of how far civil society interest groups can bridge the gap between citizens and institutions and reduce the democratic deficit.
Conclusion

Empirical results and analysis

This thesis has outlined and tested the two main models explaining the contribution of interest groups to democracy in the European Union, finding both to have significant limits and advantages. In a concluding chapter, I argued that the two models should be combined.

After setting out the research design, I first examined the conduit model in Chapter 2. With a sample of 14 cases, I assessed the congruence between the member-facing group websites and their responses to European Commission open consultations to determine how member and supporter preferences were communicated to the EU. Organising the sample into three categories, I found support for the hypothesis that the more specific a group’s stated preferences, the more likely they would be communicated to the Commission. The most congruent groups were smaller, technical groups, which represented their positions well. Larger groups, including the most well known, were true to their group’s objectives, but tended to simplify information for members, omitting policy information. The least congruent groups highlighted the problem of opaque group policy information, which left members ill informed and unable to make educated decisions about group support.

The schools of democracy model test in Chapter 3 took a wider view, with elite interviews at 4 sampled groups being central to the analysis. Assessing different features of the model, I found smaller groups fared better in involving members in decision making and associational activities, but still reached less members than the larger groups. Noting the limits of local activity in the larger groups, I considered the challenge of categorising primarily financial contributors with limited involvement, arguing such activity does not constitute associational benefits. The importance of communication and socialisation proved central to the model, with all group viewing informing members as important, but for functions reasons to improve their lobbying activities. Similarly although socialisation does occur, it only engenders awareness, not necessarily positive feelings.

Although the testing was undertaken on groups which had consulted the DG Climate Action, the results are applicable across the European civil society interest group community. Some specific findings are not generalisable; the research demonstrated that a group’s historic development can be a factor in explaining its structure, such as the differing presence of local
FoE groups in different countries or Noé21’s consensus culture. These cannot be transposed across all groups. However the main findings, such as the limits of internal democracy, the importance of group socialisation and the more specific group preferences being better communicated are supported by the evidence of a number of groups and are unlikely to be unique to the Climate Action arena.

Theoretical argument

Drawing out the main failings and merits of each model, I argued for them to be integrated to encapsulate the dual-facing nature of civil society interest groups, facing both the institutions and citizens, for a fuller assessment of their function. The conduit model expresses a central function of groups, that of communicating preferences to the EU and engaging in lobbying, but lacked important information about internal functions which left questions over how much members endorsed group recommendations. The schools model introduced the essential internal communication element, as well as linking to the theoretical literature on the creation of a European public space. With this I demonstrated that both models were necessary, but neither sufficient, to understand the theoretical contribution of civil society interest groups to bridging the European democratic deficit. These findings draw together empirical and theoretical work, making a small but important contribution to developing an understanding of the role these groups play in Europe.

Policy implications

As well as their significance for political science, the empirical findings raise important policy implications. The EC spends considerable sums on supporting these citizen interest groups, estimated at “around €1 billion” in 2000 (Greenwood, 2007, p. 117), primarily to improve legitimacy and democracy at the European level. My empirical results, as well as a growing body of sceptical literature, suggest that these groups have serious limitations for fulfilling the desired function of legitimising the EC. This needs to be considered when spending that much on keeping civil society groups.

Currently the EC favours multi-national groups in consultations (Kohler-Koch & Finke, 2007), however my research finds they do not create the international linkages hoped for due to their national branch structure, suggesting less preference should be given towards these organisations. Similarly, smaller groups often came up as better representatives of member views and more routinely included members and supporters in their activities. Although this
entails interaction with more groups, smaller organisations should not be neglected as they seem to better connect to their local communities than more abstracted large groups.

Research limitations

Data limitations were addressed in Section 1.4, but there are also additional broader issues which were identified during the testing of the models. First, this thesis has only considered representations made to the open consultation, rather than other types of lobbying activity. Other activities, particularly meetings, can be harder to assess without detailed records, and this was the primary factor for focussing on the open consultation system. However it does limit the results because we cannot be sure what sort of representations groups make outside the consultation system, and how much they represent member’s preferences.

This thesis has focussed on the groups themselves, which gives rise to two deficiencies. First, I say nothing about the representativeness of the system of interest groups as a whole, where economic and producer interests outnumber citizen interests. The second is that I do not consider how the Commission views the representations of these groups, and what importance is attached to their views. These are important questions when considering democracy at the EU; however they are not central to my investigation, which concerns the contribution of the groups which exist and their role in transmitting citizen views. Similarly, questions are raised about how much influence civil society groups have even when they do have access (Dür & De Bièvre, 2007); this is a critical issue in the participatory role of civil society, but would require a very different focus to this study.

Opportunities for future research

These limitations do suggest several opportunities for further work. Firstly, increased understanding of the Commission view on questions of group representation would be valuable enquiry. The Commission values expert knowledge and the legitimacy the groups provide, and is concerned about the representativeness of the system of interest groups as a whole, but an empirical understanding of how these factors interplay would be valuable research. Does the fact that WWF has more paid supporters worldwide than Greenpeace matter to the EC? Further research with a similar motivation to this thesis, but into the other representations made by groups to the EC, might widen the results to be more applicable to the broader activities of lobbying rather than primarily the consultation process.
To enrich the research in this thesis specifically, a more detailed investigation into the role of the exit option to members would be valuable. Currently the only feedback mechanism for many members is exiting the group, but this has limits as it is often hard to know why someone leaves (Grant, 2002, p. 7). Research into how effective the exit option is as a democratic control, would be useful to better understand an important concept in this literature.

This reliance on the exit option brings out a closing observation about the current state of civil society interest groups in reducing the democratic deficit and transmitting citizen preferences. The often limited internal democracy and asymmetrical information between group and members means that these groups currently function more like the classical shopping basket conception of political parties. Each party (or group) has a basket of views and policies. Those who vote (or join) pick their favourite selection, but have little way of influencing what is in that basket. They can leave the group if they want, but the opportunity for ordinary members to be involved is limited, especially in larger groups.

Given their representativeness has such limit, in its current form the system of civil society interest groups can be better typified as a system of public intellectuals. They contribute to informing citizens and influence the public debate as well as providing valuable knowledge to the Commission. Although supporting them may provide expressive benefits to members, the groups do not represent individuals in the way we might like, despite the other advantages.
Bibliography


Re:Common, 2013a. *Civil society organisations demand that the EU scrap its emissions trading scheme*, Brussels: European Commission.


The Corner House, 2013a. *Input to the consultation on structural options to strengthen the EU Emission Trading Scheme (ETS)*, Brussles: European Commission.


The Transnational Institute, 2013b. *Input to the consultation on structural options to strengthen the EU Emission Trading Scheme (ETS)*, Brussels: European Commission.

Available at: http://www.transparency.org.uk/
[Accessed 26 May 2013].

Available at: http://europa.eu/transparency-register/index_en.htm
[Accessed 25 May 2013].


Available at: http://www.wwf.eu/
[Accessed 26 May 2013].


Available at: http://www.wwf.org.uk/
[Accessed 26 May 2013].
Appendix

Appendix 1: DG Climate Action consultations 2010-Present

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<tr>
<td>02-Jul</td>
<td>Consultation on the Green Paper on a 2030 framework for climate and energy policies</td>
<td>×</td>
<td>These consultations are still open for responses.</td>
</tr>
<tr>
<td>26-Jun</td>
<td>Consultation on the 2015 International Climate Change Agreement: Shaping international climate policy beyond 2020 - Still open, disregard</td>
<td>×</td>
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<tr>
<td>28-Mar</td>
<td>Consultation on registry arrangements to facilitate linking with the EU Emissions Trading System</td>
<td>×</td>
<td>Only very recently closed, responses not yet published</td>
</tr>
<tr>
<td>28-Feb</td>
<td>Consultation on structural options to strengthen the EU Emissions Trading System</td>
<td>✓</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Date</th>
<th>Consultation</th>
<th>Relevant for Testing?</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td></td>
<td></td>
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<tr>
<td>16-Oct</td>
<td>Consultation on review of the auction time profile for the EU Emissions Trading System</td>
<td>✓</td>
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<tr>
<td>20-Aug</td>
<td>Consultation on the Preparation of the EU Adaptation Strategy - Survey</td>
<td>×</td>
<td>Survey based</td>
</tr>
<tr>
<td>12-Apr</td>
<td>Including maritime transport emissions in the EU’s greenhouse gas reduction commitment.</td>
<td>×</td>
<td>Results of this contribution have not been published</td>
</tr>
<tr>
<td>Date</td>
<td>Consultation</td>
<td>Relevant for Testing?</td>
<td>Notes</td>
</tr>
<tr>
<td>--------</td>
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<tr>
<td>2011</td>
<td></td>
<td></td>
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<tr>
<td>19-Dec</td>
<td>Consultation on reducing fluorinated greenhouse gas emissions - Further action at EU level</td>
<td>×</td>
<td>Survey with only aggregate data published</td>
</tr>
<tr>
<td>09-Dec</td>
<td>Reducing CO2 emissions from road vehicles</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>10-Jun</td>
<td>Consultation on the EU ETS Monitoring &amp; Reporting Regulation and EU ETS Accreditation &amp; Verification Regulation</td>
<td>×</td>
<td>Survey based</td>
</tr>
<tr>
<td>29-Apr</td>
<td>Public consultation on the Revision of Decision 280/2004/EC (Monitoring Mechanism Decision)</td>
<td>×</td>
<td>Survey based</td>
</tr>
<tr>
<td>07-Feb</td>
<td>Consultation on Auctioning third phase EU Allowances prior to 2013 ('early auctions')</td>
<td>✓</td>
<td>One group (WWF)</td>
</tr>
<tr>
<td>02-Feb</td>
<td>DG MARKT consultation on the review of the Markets in Financial Instruments Directive (MiFID)</td>
<td>×</td>
<td>Consultation undertaken by another DG</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>2010</td>
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<td></td>
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<tr>
<td>08-Dec</td>
<td>Roadmap for a low carbon economy by 2050</td>
<td>✓</td>
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<tr>
<td>25-Nov</td>
<td>Public consultation on a measure to introduce further quality restrictions on the use of credits from industrial gas projects</td>
<td>✓</td>
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<tr>
<td>14-Nov</td>
<td>Public consultation on the role of EU agriculture and forestry in achieving the EU’s climate change commitments</td>
<td>×</td>
<td>Results not published</td>
</tr>
<tr>
<td>12-Apr</td>
<td>Public consultation in preparation of an analytical report on the impact of the international climate negotiations on the situation of energy intensive sectors</td>
<td>✓</td>
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</tbody>
</table>
Appendix 2: Groups excluded from sample of Open Consultation submissions.

<table>
<thead>
<tr>
<th>Consultation Title &amp; Closing Date</th>
<th>Excluded Groups</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation on structural options to strengthen the EU Emissions Trading System- 28/02/2013</td>
<td>Climate Action Network Europe</td>
<td>Network/Platform</td>
</tr>
<tr>
<td></td>
<td>Green Circle</td>
<td>Platform of Czech NGOs</td>
</tr>
<tr>
<td></td>
<td>Green Budget Europe</td>
<td>Network of other NGO staff &amp; advisors working collaboratively on fiscal issues.</td>
</tr>
<tr>
<td></td>
<td>Friends of the Earth Latin America</td>
<td>Removed from sample as expressly for non-European citizens</td>
</tr>
<tr>
<td>Consultation on review of the auction time profile for the EU Emissions Trading System - 16/10/2012</td>
<td>European Environmental Bureau</td>
<td>Network/Platform</td>
</tr>
<tr>
<td></td>
<td>Green Budget Europe 2</td>
<td>See above</td>
</tr>
<tr>
<td></td>
<td>Green Circle 2</td>
<td>See above</td>
</tr>
<tr>
<td></td>
<td>Polish Climate Coalition</td>
<td>Platform of Polish NGOs</td>
</tr>
<tr>
<td>Reducing CO2 emissions from road vehicles - 09/12/2011</td>
<td>Transport and Environment</td>
<td>Network/Platform</td>
</tr>
<tr>
<td>Roadmap for a low carbon economy by 2050 - 08/12/2010</td>
<td>INFORSE</td>
<td>Network/Platform</td>
</tr>
<tr>
<td></td>
<td>Green Budget Europe 3</td>
<td>See above</td>
</tr>
<tr>
<td></td>
<td>ActionAid</td>
<td>French Language Submission</td>
</tr>
<tr>
<td></td>
<td>Climate Alliance of European cities with indigenous rainforest peoples</td>
<td>Association of local authorities</td>
</tr>
<tr>
<td></td>
<td>European Climate Foundation</td>
<td>No members, acts as a funding channel for research, sourcing cash from charitable funds and disseminating it as grants.</td>
</tr>
<tr>
<td>Public consultation on a measure to introduce further quality restrictions on the use of credits from industrial gas projects - 25/11/2010</td>
<td>CDM Watch</td>
<td>Research group set up by NGOs &amp; Academics to follow global carbon markets</td>
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<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Public consultation in preparation of an analytical report on the impact of the international climate negotiations on the situation of energy intensive sectors - 12/04/2010</td>
<td>Climate Action Network Europe</td>
<td>See above</td>
</tr>
</tbody>
</table>