Deliberative Layering or Biased Access?

Framing MEPs Interactions with Interest Groups across the Policy Cycle

David Coen, University College London

and

Alexander Katsaitis, Oslo University.

Abstract

Drawing from work on deliberation and information-access, this paper conceptually frames why and when different types of interests mobilize across the parliamentary policy cycle. We posit that each policy stage holds its own deliberative purpose and logic, leading to a variation in the type and volume of information demanded. The legitimacy of the expertise interest groups provide is affected by their organizational characteristics. To ensure the smooth flow of the policy process, members of parliament encourage groups that legitimately hold relevant information to mobilize at each policy stage, while lobbyists choose to mobilize when their expertise allows them to better influence policy-makers' debates. We test our argument in the context of the European Parliament, following a unique survey of the 8th legislature (2014-2019). The responses lend support to our model. In a policy process that contains various stages of deliberation, different organizations hold an information-expertise key that gives them access at different stages. Significantly, less studied groups, such as think tanks and consultancies, mobilize well ahead of others in the cycle's initial phases; while lobbyists representing public constituencies dominate in the final stages. The paper contributes to broader theoretical discussions on pluralism, bias, and deliberation in policy-making.

Key Words:

European Parliament, Lobbying, Policy-Cycle, Deliberation, Business

1| INTRODUCTION

To protect its democratic credentials against accusations of business bias, the European Parliament encourages the mobilization of a diverse interest population to inform its policy-making. As a result, over the past 15 years, the lobbyists working with the institution have shifted from primarily corporate to more general societal interests (Lehmann 2009; Coen & Katsaitis 2019a). In this paper, we aim to explain when and why different interest groups mobilize across the EP's policy cycle.

Drawing from deliberative theory and information exchange models, we argue that each policy stage has its own deliberative purpose and logic, influenced by the number of policy-makers it involves and by its degree of openness towards different constituencies (Eriksen & Fossum 2000). These factors lead to a concomitant variation in the type and volume of information demanded. On the supply side, the legitimacy of the information interest groups provide is affected by their organizational characteristics, notably the number of their principals and their lobbying objectives (Zürn et al. 2012). MEPs encourage groups that offer legitimate and relevant information to engage at each policy stage, while lobbyists mainly choose to mobilize when they expect that their expertise will allow them better to influence policy-makers' debates.

We assess our model through a survey conducted with MEPs during the 8th legislature, asking how often different groups contact their office at different policy stages. The results reveal variation across the cycle in the mobilization of different interest group categories. This paper contributes to discussions of political pluralism and interest group mobilization in parliaments (Brack & Costa 2018; Chaqués-Bonafont & Muñoz Márquez 2016; Coen & Katsaitis 2019b).

Theoretically, it develops a conceptual frame for analysing interest group mobilization across a variety of lobbying actors and during the whole policy cycle of the EP. It raises questions about unequal access, highlights hitherto under-researched third party groups that may have an impact on policy outcomes, and reaffirms the need to track lobbying footprints at the cycle's earlier stages. Empirically, the results provide an assessment of the lobbying activities faced by MEPs across the policy cycle. Finally, the paper has normative implications regarding the role of deliberative processes in policy making by representative institutions (Fishkin & Mansbridge 2017).

2| THE POLICY CYCLE & DELIBERATION

The EP faces a diverse population of groups providing information (inputs) to policy-makers that demand it, in exchange for inside information, influence over the final output, and insider status (see Coen & Katsaitis 2015, 2019a on population diversity). Assuming that the EP wishes to maintain its democratic legitimacy, MEPs can be expected to demand information from interest groups to engage in debates that produce legitimate legislative outputs, a form of deliberation where policy-makers receive and process information to make policy choices.

Because the EU's policy-making circuit is complex, institutional involvement and interest representatives' participation changes as the process evolves. Each policy stage has its own feedback loops, but ultimately it must produce a useful component of the package and then move the legislative proposal towards the final output. It is rather unlikely that the entire population of lobbyists mobilize homogenously and that policy-makers' information demands remain stable across the cycle's steps.

With limited resources, both policy-makers and interest groups aim to maximize their utility by meeting when their demand and supply preferences correspond (Hall & Dearforff 2006). At each policy stage, MEPs will primarily interact with the groups that legitimately supply relevant information, interest groups will prefer to mobilize when their information is in greater demand, and they expect to exert more influence. More generally, groups that are given better access at each policy stage will on average mobilize more than others.

2.1.1 Supply & Organizational Structure

The legitimacy of interest groups' information is impacted by their organizational structure, operationalised by two criteria: the group's incentives and the number of its principals. The group's organizational incentives are a qualitative criterion that can be located on a continuum between two extreme profiles (Zürn et al. 2012). At one end, a group may only seek private benefits such as financial profit or increased market share. On the other, a group may only have public-spirited objectives, such as improving general welfare or advocating moral arguments. For example, banks are likelier to be invited to provide information on banking regulation, whereas civil society groups are more likely to be asked to provide information on human rights.

Secondly, the type of information a group can provide is affected by the number of principals it has. On one extreme, a group can represent a single private principal such as a single physical or legal entity (e.g., a natural person or an individual company). On the other extreme, a group can represent

numerous principals such as a global constituency. Groups that have fewer principals represent interests set out by their clients (e.g. consultancies, law firms), their board (companies), or a finite number of members (associations, trade unions). Such groups have limited direct contact with the public domain, and are less dependent on public approval to reach their objectives. This predisposes them to operate within elite circles, and makes it less likely that their information will change over time due to socio-political factors. Groups with fewer principals may also be capable to function as a crystallising core within advocacy coalitions, connecting different groups under broader messages while maintaining versatility.

Interest groups that have as their main objective to benefit broader categories of principals, such as a local electorate in a region or municipality, or members of NGOs or religious groups serving complex public goals operate more closely with the public domain and need a stable or growing membership and/or public approval to retain their relevance (Warleigh 2001; Katsaitis 2015). The information they provide is reflecting public opinion and its fluctuations. The two variables are of course correlated: organizations with fewer principals are more often linked to private objectives, multiple principals are more often associated with organizations defending public-spirited objectives.

2.1.2 Demand & Deliberation

Demand for information at each policy stage is linked to the deliberative logic in place (Eriksen & Fosum 2000). Considering the extensive literature discussing various criteria (see for example, Curato et al. 2017) we select inclusiveness and openness as the main variables that can help us distinguish the types of deliberation prevalent at different policy stages. To operationalise these two variables, we propose two measures that help us to describe the deliberation logic of each policy-making stage.

(1) Policy-maker Inclusiveness, refers to the extent each policy step draws policy-makers from the EP to discuss and process information before moving on to the next step (the number of MEPs involved at each stage). As more MEPs participate in the legislative process, the overall demand for information increases, leading to more mobilization of interest groups. Except for trilogues, policy-maker inclusiveness increases during the procedure, with more MEPs included at each step. Trilogues are informal meetings with representatives from the EP, the Council and the Commission that have been gradually institutionalised since wider use is made of the co-decision procedure[1].

[1] The co-decision procedure or, as it is better known following the Lisbon Treaty, the ordinary legislative procedure, is a legislative procedure where the EP and the Council act as co-legislators on legislative proposals made by the

(2) Constituency Openness, refers to the degree each policy step engages with different constituencies. It is a relative measure that describes to what extent different types of constituencies are comparatively more or less welcome to provide information, again on a continuum between two extreme situations. On one end of the scale, a policy stage may be very open to private interests but exclusive towards public interests. On the other, a policy stage may be very open to public interests but exclusive towards private interests. This also affects the type of constituencies invited by MEPs to participate in the deliberations.

2.2. Deliberative Layering: How Demand Meets Supply at Different Stages

The EU's policy-making process has numerous phases, feedback loops, and actors involved. Even at times where the EP's direct involvement is limited, Parliament remains relevant to the overall process. For example, while the EP awaits the Commission's legislative proposal it already engages in informal discussions. From the EP's perspective we distinguish six major steps of the policy cycle: i.) the drafting of the Commission's proposal; ii.) the transmission and analysis of the Commission's formal proposal; iii.) amendments and votes in the committee; iv.) trilogues; v.) plenary debates and amendments; vi.) final plenary vote. At each stage the nature of deliberation changes, affecting overall demand for information and the interest group categories (representing certain constituencies) that can legitimately supply it. We now provide expectations as to how demand and supply will vary at each stage and which groups we expect to mobilize more.

i) The Drafting of the Commission's Proposal: Deliberative Elite

When the Commission is preparing a new proposal, the EP involves only a handful of representatives such as the committee chair and secretariat, and selected political group representatives. Deliberation is informal and limited to elite parliamentary actors that attempt to extract information on the proposal's drafts, engage in blue-sky thinking, and signal their likely responses to important points of the Commission's subsequent formal proposal.

In a parliament that represents different national and political interests this small group of MEPs has an incentive to keep the process limited to a few interest representatives that can provide

Commission. Following the Lisbon Treaty in 2009, legislation in most policy fields is conducted under co-decision. As such, the EP can veto a legislative proposal if it does not come to agreement with the Council, and vice-versa. To ensure a smooth legislative process, EU policy-makers employ trilogues (see p.7)

information linked to normative and general issues, which will frame the discussion's main topics and constrain options for the broader set of actors at later stages. Therefore, the groups that are likelier to be asked to supply information are network architects representing a limited number of principals and committed to their objectives.

ii.) The Commission's Formal Proposal: Pragmatic Deliberation

Once the Commission tables its formal proposal to the EP, the debate opens up to the competent committee in charge of the legislative file. Usually under pressure to produce a timely output, the committee members engage in a pragmatic deliberation (see Habermas 1996). Policy-making now involves the most pertinent constituencies that have the capacity to understand the proposal's technical language and its likely political impact, and to propose effective amendments.

The committee's influential interlocutors, especially the rapporteur and the shadow rapporteurs, seek information from network architects who continue to provide information on central points of contestation or agreement with respect to broader coalitions within the committee. Simultaneously, the committee's MEPs engage in 'cheap-talk' (Farrel & Rabin 1996) demanding input from organizations within their constituencies to discuss potential responses, courses of action and their political costs. Overall, this stage gives a competitive advantage to organizations that act as network builders, professional organizations with the capacity to represent private interests, and organizations representing local or thematically limited public constituencies.

iii.) Committee Amendments & Vote: Inclusive Deliberation

The committee amendment and vote stage is a critical component in the EP's policy-cycle (Marshall 2010). Because parliamentarians face a significant workload, they outsource responsibility over each proposal to their most relevant colleagues in the responsible committee. If a legislative proposal passes this stage it is very likely to pass the plenary, making the committee's proposed draft resolution also the EP's final position. To maintain its legitimacy as a crucial institutional sub-unit, the committee takes time to consider and avoid potential political opposition that could arise against its proposal in the plenary. Put differently, the proposal that reaches the plenary must take into account the balance of political preferences to ensure its viability at the final stage. Simultaneously, to avoid electoral costs, the committee's MEPs act and wish to be perceived as their constituencies' active representatives.

Therefore, the committee must engage in a broader discussion that identifies compromises between specific constituencies' preferences and those of the broader electorate. At this stage, the MEPs are open to multiple interest constituencies. Every interest group category may be able to provide useful information and many groups are invited to engage with the committee.

iv.) Filtering the Debate: Trilogues

Informal contacts and negotiations between the three institutions may occur at any stage of the legislative procedure but proper trilogues usually start after the responsible committee has adopted a negotiating mandate. Their purpose is to facilitate the debate within the EP`s main political groups, to tackle disagreements between the Council and the EP, and to reduce the time it takes to produce the final legislative output (Reh et al. 2013); as such trilogues allow limited access to external actors. This leads recurrently to critical discussions among the political leadership of the Parliament with regard to transparency and democratic legitimacy.

Our expectation is that member state governments have an insider track during this stage and mobilize to use it effectively. The MEPs involved in trilogues are likely to invite member states to provide information to better understand and discuss the dossier's progress before the formal proposal is accepted for the plenary debate. Due to the lack of inclusiveness of trilogue negotiations, aggregate mobilization is weak at this stage.

v.) Plenary Amendments and Plenary Vote: the Public Deliberation

Once the proposal passes the committee vote or, in many cases, the trilogue, it is submitted to the Parliament for the plenary vote, a process that leads to stronger politicization of policy-making (Grant 2005). At this point most MEPs engage in the deliberation, considering how the electorate is likely to react to a vote in favour or against the proposal. This process is steered by political groups' leadership and entails a peak of the aggregate mobilization rate. The plenary serves as a forum where MEPs act as and represent ordinary citizens, striving to understand, assess and decide in accordance with broader political objectives and preferences. As informational input should represent significant electoral constituencies, civil society associations, regional authorities, religious organizations and member state governments have a competitive advantage.

We should note that plenary amendments are sometimes less contested because they are submitted by the rapporteur and the committee as a whole. In such cases, the objective is not to change core

principles of the proposal but to adapt technical details with a view to final compromises. While we expect substantial aggregate mobilization rates in both phases, we expect that lobbying groups with a good technical understanding of the proposal mobilize more strongly during the plenary phase. To summarise, we outline our model in table 1.

Table 1: Deliberative stage and interest groups mobilizing.

Policy Stage	***Deliberation Logic***	***Interest Groups Mobilized Primarily***	***Total Mobilization***
Commission Proposal Preparation	Elite	Consultancy, Law Firm, Think Tank	Limited
Commission Proposal	Pragmatic	Consultancy, Law Firm, Think Tank, Associations, Trade Unions, Company	Substantive
Committee Amendments & Vote	Inclusive	All Groups	Significant
Trilogues	Exclusionary	Member States	Limited
Plenary Amendments	Specialized	Companies, Trade Unions, Associations	Significant
Plenary Vote	Public	Member State, Civil Society, Regional Offices, Religious.	Peak Mobilization

3| SURVEYING MEPS

To assess our framework, we conducted an anonymised survey during the 8th parliamentary term (2014-2019), assessing MEPs' attitudes towards interest groups and estimates of the activity of certain types of them, including the overall lobbying intensity MEPs experienced across the policy cycle.

Specifically, in the survey we asked: "Do some types of interest groups contact you more often during different phases of the policy-making cycle? Please tick the appropriate boxes". Under contact,

we specified that included any form of contact such as email, telephone, personal meeting, fax, and other. While under 'you' we specified it included the MEP as well as any member of her/his accredited staff. Considering the extensive literature on interest group classification, and the need to improve subject responsiveness we chose the interest group categories applied in the EU's Transparency Register (TR). Using the TR's categorization enabled MEPs to identify rapidly different lobbying groups.

In addition to the TR´s nine categories we included the option of 'member state representative'.[2] Despite their de facto role in the EU's policy-making process, in practice and in much of the research literature member state representatives tend to be treated separately from non-state actors and ignored in studies examining lobbying in the EP. For both institutional and resource-based reasons this seems unsatisfactory. On the one hand, the Council's central decision-making role in the EU ensures that member states have an insider track in their relations with the other EU institutions. On the other, member states have greater resources than most non-state actors (with some notable exceptions), reflected not least by their permanent representations in Brussels. By taking member states' central role in the EU's policy-making into account we aim to improve our knowledge of their lobbying activities across the policy-cycle beyond formal institutional interactions.

To assess the varying degrees of overall mobilization towards the MEPs per policy cycle phase, the survey also asked: "When are you contacted most often by interest groups during the policy-making cycle?". The questionnaire then provided six policy phases (see above) and five ordinal intensity categories as responses. The first survey wave was sent out in October 2014. Subsequently, follow-up questionnaires were sent approximately once a month, until June 2015. In total, we received 74 responses from MEPs, a 10% response rate of the entire population of MEPs (751) which is comparable to other recent online surveys of EU policy-makers (e.g., Egeberg et al. 2014). The sample comprises responses from MEPs of all political groups.

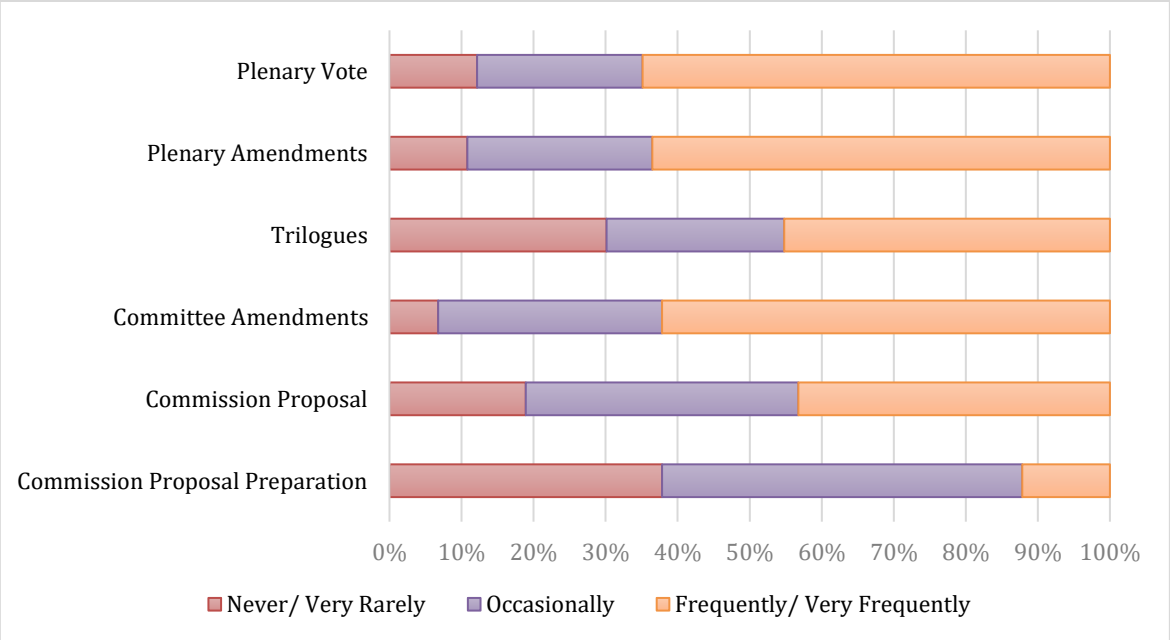
4| RESULTS

4.1 Aggregate Mobilization

[2] The following categories are: (i) Professional Consultancy, (ii) Law Firm, (iii) Trade/Professional Association, (iv) Trade Union, (v) Company, (vi) NGO, (vii) Think Tank, (viii) Religious Group, (ix) Regional/Municipal Organization, (x) Member State. We also gave respondents the option to provide additional comments.

The results reproduced in Figure 1 show that as policy-cycle stages become increasingly inclusive (except for trilogues), interest groups contact MEPs more often. During the plenary vote, for instance, nearly half of the respondents were contacted 'Very Frequently', more than at any other moment. However, at the policy cycle's earlier stages, where deliberation mainly involves elite groups, MEPs are contacted less frequently ('Never' or 'Very Rarely' more often given as a response than in any other phase). Similarly, trilogues are characterised by limited mobilization in comparison to other stages, confirming criticism of their exclusivity and lack of transparency (Heritier & Reh 2012). MEPs receive quite frequent contact requests during the plenary amendments, sometimes 'Very Frequently' responses given more often than during committee work (amendments & vote). MEPs´ responses suggest that plenary amendments are a policy-making step that draws in interest groups to a considerable extent.

Figure 1: Responses to question: "When are you contacted most often by interest groups during the policy-making cycle?"



These results lend support to our overall model and confirm theoretical discussions on deliberative policy-making. MEPs interact among each other through formal and informal discussions where diverse types of information such as different sources of data, technical reports or opinion poll results are exchanged, thus generating demand for expertise to confirm or refute issues raised by fellow

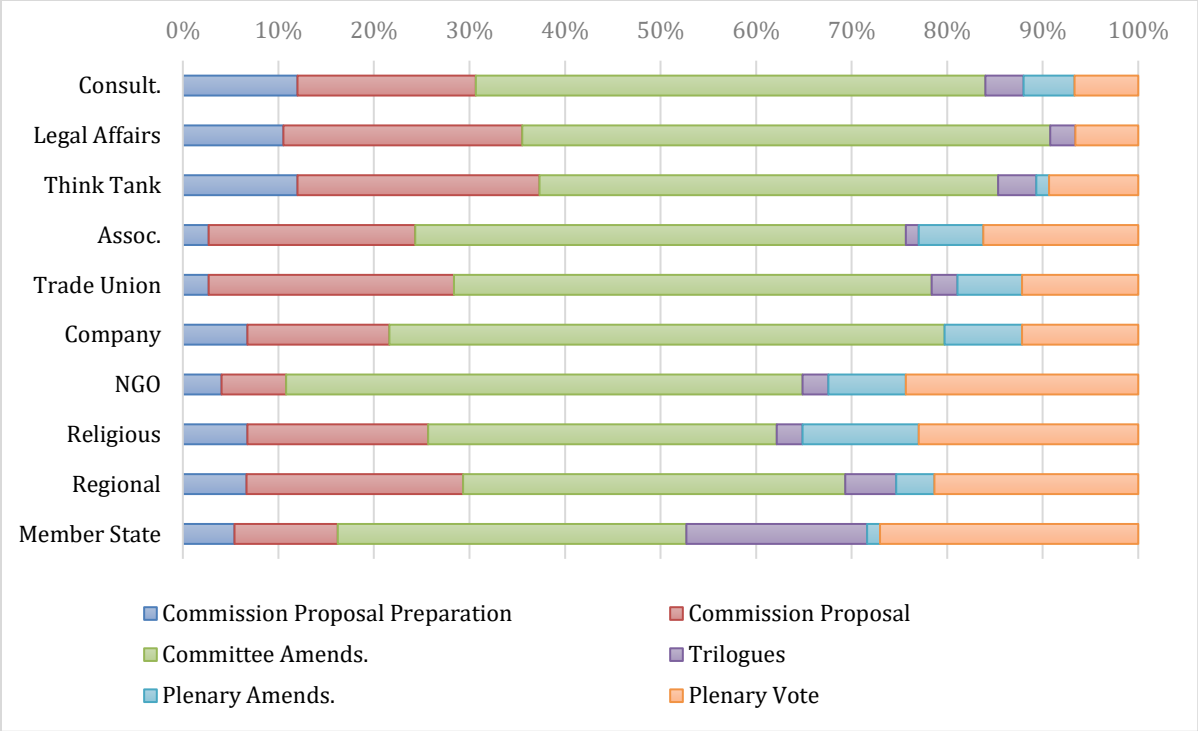
MEPs. Thus, while the party agenda and party whip may discipline individual members, it does not absolve them from the need (and the responsibility) to arrive at informed decisions.

4.2 Variation across the Policy Cycle

To better understand which are the interest groups involved at each stage, we assess below the results given in response to the question "Do some types of interest groups contact you more often during different phases of the policy-making cycle?". The results given in Figure 2 allow two observations: each policy stage is characterised by different types of interest groups mobilizing more intensely, which lends support to our assertion concerning constituency openness and lobbying diversity. The largest interest representative categories, business and civil society, mobilize substantially during committee amendments and votes but show different lobbying patterns across the other policy cycle stages. Furthermore, groups which represent a smaller part of the lobbying population (consultancies, law firms, think tanks) have uneven access at the earliest stages, indicating variation of bias within the private interest domain.

The elite nature of the policy cycle's initial steps makes it harder to observe interest group activity because fewer policy-makers need less information, reducing the arithmetical basis for quantitative analysis. Deliberations involve a small number of actors and groups that are invited to participate have mostly specific private objectives and few principals. But these lobbyists have the opportunity to shape the debate early on, potentially influencing the legislative proposal more than any other group at later stages. We note that during the committee amendments and votes all interest groups, across the board, increase their activities, confirming other studies assessing lobbying at the committee level (Rasmussen 2015). As the committee´s task is to prepare the draft proposal for a resolution to be tabled to the plenary committee members need broad expertise to increase the chance for a strong vote in favour in the plenary.

Figure 2: 'Do some types of interest groups contact you more often during different phases of the policy cycle?



Considering member state governments´ relatively constrained lobbying during committee work one could surmise that their quasi-monopoly during trilogues gives them a strong potential to influence the discussion later on. It remains a question for further research to what extent this could be a purposeful strategy to reduce the need to mobilize more actively at the committee level. Significantly, despite MS's resources and insider advantage, their activity does not dominate across the board. This generates questions regarding the extent to which legislative proposals are influenced by MS and/or the Council, and specifically whether some MS influence the debate more than others. Moreover, this draws attention to potential cross-institutional cleavages between the Council and the EP, similar to the case of the US House of Representatives and the Senate. In a changing European political order, cross-institutional alliances arise within levels of government (Olsen 2015), sustained through formal and informal policy-making interactions.

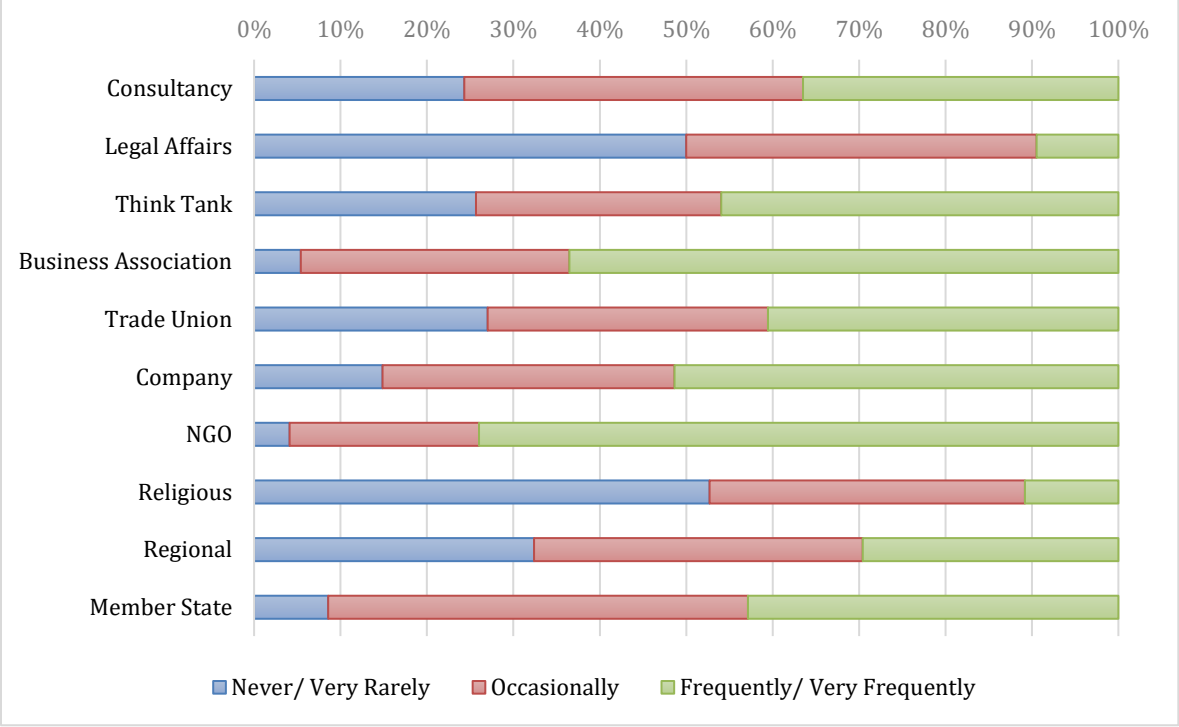
At the plenary stage, the data show that constituency openness generates corresponding demands. At the policy cycle's most public stage, MEPs broadly assess the proposal's implication for a wider electoral constituency, taking into consideration a variety of political alliances and ideological affiliations. Groups with electoral representation capacity are active well above the mean, underscoring key differences between the most notable lobbying groups, business and civil society: both mobilize

significantly but at different stages. However, mobilization does not necessarily mean influence. Moreover, the assumption that different groups mobilize against each other does not fit the policy-making or lobbying logic employed in Brussels. Therefore, to grasp whether mobilizing at different moments entails losses in influence we need a better understanding of the coalitions in place and of access bias at specific stages. Think tanks capacity to mobilize at the policy-cycle's earlier stages suggests that they have a better position to influence the discussion than business or civil society. But without an understanding of think tanks' broader coalition partners, such observations do not have much explanatory or comparative value. However, the results do show that some groups are likelier to be invited at some points of the cycle than others.

4.3 Variation & Influence across Groups

In the following sub- section we proceed with two empirical questions following from the previous chapter: do some groups mobilize more than others? And, which groups are seen as more influential? In other words, regardless of the mobilization intensity during certain policy stages, how do MEPs perceive the overall contribution of specific interest groups to the deliberation on the whole? And how do MEPs assess these groups´ impact on the final outcome?

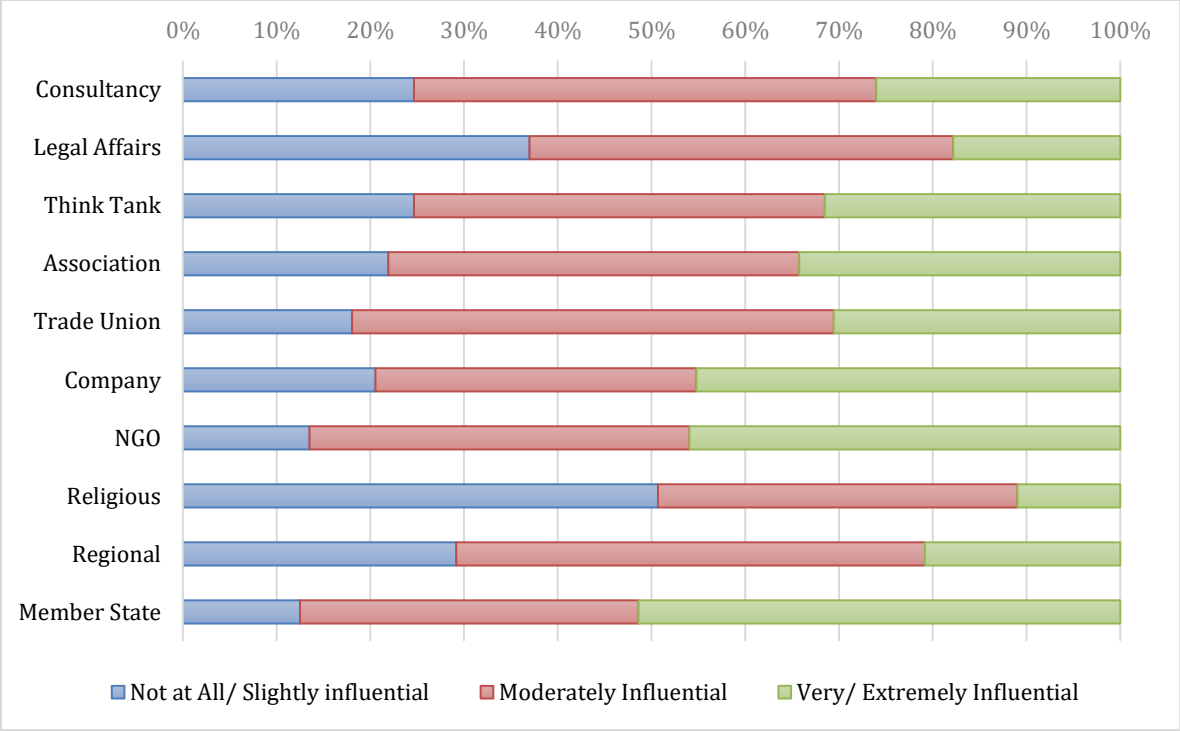
Figure 3: 'How often are you contacted by different groups?'



To answer the first question our survey asked the MEPs 'How often are you contacted by different groups?' The results presented in Figure 3 highlight the disproportionate mobilization of groups representing a smaller percentage of the total lobbying population. On the one hand, this highlights the need for further research on the variety of organizations mobilized within the EP. On the other hand, it suggests that all groups, but some more than others (NGOs, in particular) spend time networking with MEPs beyond the policy cycle. We do not wish to conflate perceptions of mobilization with perceptions of influence. That is to say, simply because these groups mobilize more does not necessarily mean that they are perceived as equally influential. To assess that dimension, we asked MEPs 'How influential do you believe different types of interest groups are in the European Parliament?', providing them with the ten interest group choices and five ordinal options from ´Not at all Influential´ to ´Extremely Influential´.

According to their responses (see Figure 4), MEPs perceive all organizations, including NGOs, as influential to some degree (only religious groups and law firms are an exception). This is in line with the work of scholars arguing that civil society has attained a prominent role in the EU's policy-making. From a methodological perspective, the results highlight issues of inferring influence from interest groups mobilization rather than output-based approaches. It also reflects the subjectivity of MEPs´ impressions, emphasizing the impact of the biggest groups (e.g., business associations). Member states, NGOs, and companies are perceived as the most influential lobbying organisations but we have to remind ourselves that the real influence of private interests or member states is difficult to pin down in the multi-dimensional lobbying game.

Figure 4: 'How influential do you believe different types of interest groups are in the European Parliament?



5| CONCLUSIONS

In this article, we concentrated on the differences in interest group mobilization across the EP's policy-making cycle. Our research question was to assess whether the wide spectrum of lobbyists working with MEPs mobilizes in different ways across the policy-cycle, and if so, why? Building on theories of deliberation and information-exchange, we argued that different types of deliberation are layered on top of each other, until a final legislative output emerges at the end of the legislative production line.

The survey results illustrate a heterogeneous policy-cycle within the EP, where a different deliberative logic is applied at each step, eliciting different lobbyists' mobilization rates and intensities. The total number of policy-makers involved also impacts the overall intensity of lobbying observed across the various steps of the legislative procedure. Where the process remains an elite affair, with few MEPs involved, the aggregate mobilization is limited. It increases progressively as more MEPs join the deliberative circles, leading to peak aggregate mobilization during the plenary vote. On the other hand, each stage is more or less open to a specific category of interests that share similar

organizational characteristics, as the prevailing deliberation logic depends on legitimate sources of different types of information. One potential side-effect is that as aggregate mobilization increases, and especially during stages of peak mobilization, the role of insiders might be strengthened. That is to say, MEPs employ groups within categories they trust more to process this information and avoid overload.

The results also highlight that if we aim to tease out the nuances of the interactions of interest groups with the EU institutions and the policy-making practices within the institutions, the variety of lobbying approaches mobilized in Brussels today should be examined in more detail. Information remains the access card into the EP. However, the institution's deliberative capacity, and the interest groups surrounding it have evolved, adding new doors and keys along the policy-making line. In the EU's pluralist context, diverse groups can legitimately provide different types of information. Furthermore, our results confirm that committee debates are the most open access point to the EP in terms of diversity because there is only limited bias towards specific types of groups during this phase.

In conclusion, we found a layered structure where different types of deliberation are involved in the EP's policy-making. Public interest mobilization in the EP neither serves as an inclusive participatory tool for citizens, nor as a professionalized setting that serves solely a business bias. MEPs rather act as political entrepreneurs, selecting constituencies relevant to their deliberative logic in order to move the legislative proposal further along the policy conveyor belt. From this perspective, the results suggest that less visible groups such as consultancies or law firms are more easily recalled by MEPs because of the targeted activity they conduct at the cycle's less crowded phases.

The paper contributes to the theoretical analysis of pluralism, bias, and deliberation in the EU's policy-cycle. We have seen that we cannot assume that across the policy-making cycle informational demands are homogenous or just divided up between the largest groups, i.e. business and civil society. In a complex policy-making process that is made up of various logics of deliberation, different organizations seek to have appropriate access at different stages. We submit some exploratory hypotheses and data as a contribution to the literature on intra-institutional deliberation and the external factors influencing its outcomes. Our model of a multi-layered policy-cycle analysis is based on data obtained from a survey of MEPs and their reactions to a diverse interest group population's activities. Hence, we provide a map of lobbying strategies as experienced by the MEPs, and show that some understudied interest group categories have substantial access to the EP legislative train at important stations. From a normative angle, this raises some questions regarding the EP's democratic

legitimacy and the involvement of public interests at latter policy stages. At the same time, we wish to highlight that citizens' hold their own distinct procedures into Brussels' policy-making. Future research should aim to combine democratic theory and empirical research on interest group mobilization to advance this important field of public policy.

REFERENCES

Brack N., Costa O. (2018). Democracy in parliament vs. democracy through parliament? Defining the rules of the game in the European Parliament. *Journal of Legislative Studies,* 25 (1): 51-71.

Chaqués-Bonafont L and Muñoz Márquez LM (2016) Explaining interest group access to parliamentary committees. *West European Politics,* 39(6): 1276-1298.

Curato N., Dryzek J.S., Ercan S. A., Hendriks C. M., & Niemeyer S., (2017). Twelve Key Findings in Deliberative Democracy Research. *Daedalus,* 146 (3): 28-38.

Coen D, Katsaitis A. (2019a) Legislative Efficiency and Political Inclusiveness: The Effect of Procedures on Interest Group Mobilization in the European Parliament. *Journal of Legislative Studies* 25 (2): 278-294.

Coen D, Katsaitis A. (2019b). Between cheap talk and epistocracy: The logic of interest group access in the European Parliament's committee hearings. *Public Admininstration*, 97(4): 754–769.

Coen,D., A. Katsaitis. (2015). Institutional and Constitutional Aspects of Special Interest Representation. Study for the *Committee on Constitutional Affairs, European Parliament. Directorate General for Internal Policies, Policy Department C: Citizens' Rights and Constitutional Affairs*.

Egeberg M., Gornitzka Å., Trondal J. & Johannessen M. (2013). Parliament staff: unpacking the behaviour of officials in the European Parliament, Journal of European Public Policy, 20 (4): 495-514

Eriksen, E. O., and Fossum, J. E. (2000). *Democracy in the European Union: Integration Through Deliberation*. Routledge: London

Farrel, J., Rabin, M. (1996). Cheap-Talk. *Journal of Economic Perspectives,* 10(3): 103-118.

Fishkin J.S., Mansbridge J. (2017). The Prospects & Limits of Deliberative Democracy. *Daedalus,* 17 (3): 6-13.

Grant, W. (2005). Pressure politics: A politics of collective consumption? *Parliamentary Affairs*, *58*(2), 366–379.

Habermas, J. (1996). Between facts and norms: Contributions to a discourse theory of law and democracy. Cambridge, MA: MIT Press.

Hall R. L., Deardorff A. V. (2006). Lobbying as a Legislative Study. *American Political Science Review*, 100 (1): 69-84.

Héritier A., Reh C. (2012). Codecision and Its Discontents: Intra-Organisational Politics and Institutional Reform in the European Parliament. *West European Politics* 35 (5), 1134-1157.

Katsaitis A. (2015) EU Democratic Deficit(s) and Legitimacy; System Versus Sub-System Level. In: Demetriou K. (eds) The European Union in Crisis. Springer.

Lehmann, W. (2009). The European Parliament. In Coen, David and Richardson, Jeremy (Eds.). Lobbying the EU. *Oxford University Press: New York*.

Marshall, D. (2010). Who to lobby and when: Institutional determinants of interest group strategies in European Parliament committees. *European Union Politics*.

Olsen J.P. (2015). Democratic Oder, Autonomy, and Accountability. *Governance* 28 (4): 425-440.

Rasmussen M. A. (2015). The Battle for Influence: The Politics of Business Lobbying in the European Parliament, *Journal of Common Market Studies* 53 (2): 365-382.

Reh C., Heritier A., Bressanelli A., Christel K., (2013). The Informal Politics of Legislation: Explaining Secluded Decision-Making in the European Union. *Comparative Political Studies* 46 (9): 1112-1142.

Warleigh, A. (2001). "Europeanizing" Civil Society: NGOs as Agents of Political Socialization. *Journal of Common Market Studies*, *39*(4), 619–639.

Zürn, M., Binder M, Ecker-Erhardt M. (2012). International Authority and its Politicization. *International Theory,* 4 (1). 69-106.