Speak to Me Only with Thine Ayes?

The representativeness of professional EU advocacy groups

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Abstract

The European Commission, in an attempt to enhance its democratic decision-making, engages in an institutionalised dialogue with representative EU advocacy groups. However, one important strand of interest group scholars argues that as a result of recognition, groups professionalise and lose their representativeness. They argue that as a result the positions put forward by EU groups no longer represent the interests of their members and supporters, because these have no or little say in the formation of EU positions. It follows that the European Commission’s strategy is doomed.

This thesis challenges the argument that EU advocacy groups necessarily lose their representativeness as they become professional. Such a position relies on overly narrow conceptions of representativeness and professionalisation, ignoring organisational differences. First, representation does not rely only on member participation. Second, the representative claims of advocacy groups also have to be accepted by members and supporters as representing their interests. Third, professionalisation is more than bureaucratisation and has to include the application of new media technology for the dimensions of representativeness.

These insights suggest the claim that groups necessarily lose their representativeness as they become professional has to be qualified. Drawing on the analysis of documents and websites of five EU environmental groups and their member groups, as well as interviews conducted by the author, this thesis demonstrates the limitations of the existing literature. The findings show that the implications of professionalisation for representativeness vary according to organisational structures and strategies. The thesis also exemplifies how the new media can increase representativeness. Finally, it affords new insights into how advocacy groups contribute to democracy in the EU and beyond.
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Friends of the Earth Europe
Greenpeace EU
Climate Action Network Europe

Represented by EU environmental groups: The acceptance dimension

By member groups

Friends of the Earth Europe
Greenpeace EU
Climate Action Network Europe

By member groups' members and individual supporters

Friends of the Earth Europe
Greenpeace EU
Climate Action Network Europe

Professionalisation in gyroscopic and surrogate representation

Bureaucratisation and gyroscopic/surrogate representation

Friends of the Earth Europe
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1 Introduction

The European Commission, in an attempt to enhance the democratic quality of its decision-making, is trying to bridge the gap with civil society – that is bringing the EU closer to the citizens – in new ways. One of its strategies is to undertake an institutionalised dialogue with representative EU advocacy groups active in the general interest.

However, one important strand of interest group scholars argues that the professionalisation of EU advocacy groups negatively affects their representativeness (on a threshold of media performance professionalisation see Frantz 2007; Frantz and Martens 2006; Saurugger 2005). In this literature professionalisation refers to a process whereby groups put in place structures, procedures and practices, such as the employment of full-time expert staff, in order to become more effective organizations. Some interest group scholars point to a lack of member and supporter participation (see Saurugger 2008 for an overview; Sudbery 2003, 87; Warleigh 2001, 2004). Others argue that the institutionalisation of advocacy groups leads to the centralisation and bureaucratisation of organisational structures and the creation of elite leadership remote from members and supporters, in other words grassroots interests (Kohler-Koch 2010, 111; Kohler-Koch 2008; Warleigh 2001). According to these approaches, EU positions put forward by EU groups in Brussels no longer represent the interests of their members and supporters, because they have little or no say in the formation of EU positions (Sudbery 2003, 87; Warleigh 2001). The conclusion of these scholars is that the European Commission’s attempt to enhance the democratic quality of its decision-making through the engagement with EU advocacy groups is doomed.

This thesis challenges the argument that EU advocacy groups necessarily lose their representativeness as they become professional. The
traditional argument fails to take into account organisational differences. First, the traditional assumption of what makes a group representative is based on a narrow and out-dated understanding of representation. Secondly, the traditional argument overlooks an important dimension to representativeness. The ‘representative claims’ (Saward 2006) of advocacy groups rest not only on how positions are formed (acceptability dimension), but also on whether members and supporters accept the advocacy group as representative (acceptance dimension) (based on the definition of government legitimacy drawing on Kielmansegg 1971, 368 in Dingwerth 2007, 14).

Third, the traditional argument is based on an overly narrow conception of professionalisation, which is mostly restricted to bureaucratisation (though social movement literature broadens the term professionalisation to include network structures Kriesi et al. 1995 in Saurugger 2005, 267). This understanding of professionalisation is almost by definition at the cost of member participation. It assumes that institutionalisation, bureaucratisation and co-optation of group structures and strategies are necessary and inherent elements of the process. However, the connections between these processes need at the very least to be argued for or empirically demonstrated, not simply asserted.

Fourth, the new media has altered modes of communication, participation and representation. Professionalisation in the application of new media technology thus carries important implications for both – professional use of new media may not require hierarchialization, bureaucratisation or co-optation, for example -- but particularly for the acceptance dimension of representativeness. The traditional conception of representation is derived from theories of representative democracy and precisely electoral representation, based on member participation in formal decision-making structures. However, political parties function differently to advocacy groups due to their mission, organisational structures and constituencies. The traditional assumption of
representativeness is based on what Mansbridge calls ‘promissory representation’ in context of electoral representation. In a promissory representation a group leadership is elected and supports policy positions as promised in the electoral campaign. The leadership has then to keep these promises made to its members during its term in office. In this case, if a group becomes more professional in the bureaucratisation sense, leading to the creation of expert staff taking decisions disconnected from grassroots membership, the representativeness of the group or position is hampered. However, as Mansbridge argues, there are various types of representation also in electoral representation. Mansbridge’s four types of representation are *promissory representation; anticipatory representation*, where a group leadership supports policy positions anticipating support of members and supporters in hindsight; *gyroscopic representation*, where the policy position is formed based on the groups’ own knowledge and expertise in the field and on the groups’ principles and common sense; and *surrogate representation*, where a group represents interests beyond its member- and supportership and positions are formed based on empathy with the beneficiaries (Mansbridge 2003; qv Halpin 2006 on advocacy groups).

By applying Mansbridge’s typology to case studies of EU environmental advocacy groups, this thesis shows that those advocacy groups that represent a cause tend not to have promissory or anticipatory representation structures, but rather are gyroscopic and surrogate. Environmental groups form their positions based on scientific research and expertise on the ground, not because members and supporters have formed and formally voted on a position. The nature of the environmental cause they represent explains why the acceptability dimension here is gyroscopic. In addition, the acceptability dimension is surrogate, because they stand in for the environment and future generations, which themselves have no voice.
Taking into account the dimensions of representativeness implies that judging the representativeness of a group is predicated on two aspects: firstly, what a group bases its position formation on (organisational strategies and structures), which in turn affects the importance of and the indicators by which the acceptance dimension can be judged. In promissory representation it is the vote by the members which expresses the acceptance of the position(s) and leadership. In anticipatory representation it is the re-election which expresses the acceptance of the position(s) and leadership. In the case of gyroscopic and surrogate representation, the acceptance dimension is a separate act of the acceptability dimension and is all the more crucial for the judgement of representativeness, precisely because the support by members and supporters has not been expressed during the formation and vote of the position. Although regular subscriptions to a group, number of volunteers, donations or ‘Facebook likes’ and tweets indicate the general acceptance of the group’s principles and positions, judging the acceptance dimension of a specific position in environmental groups requires more precise indicators. Acceptance can be judged based on the support expressed by signing offline and online petitions and campaigns, volunteering for specific issues, giving project-specific donations, taking campaign action such as writing to or ringing MPs, liking and sharing Facebook events and campaigns or tweeting about campaigns and positions.

The findings presented in the chapters that follow show that the indicators by which the acceptance dimension can be judged further depends on the organisational type, for example whether the EU group is an umbrella group of a network of independent advocacy groups, such as BirdLife Europe, or whether the EU group is the EU representation of a European or global advocacy group, such as the WWF European Policy Office. In the case of the WWF the acceptance dimension can be assessed by the number of supporters within Europe, since members and supporters have a sense of belonging to a global group with a global mission and
strategy. WWF-UK supporters understand that they belong to a group that is active EU-wide and globally. In the case of Birdlife, supporters of its national member groups such as the RSPB in the UK or the NABU in Germany do not necessarily realise that their groups are members of an EU umbrella representing their interests in Brussels. Here the judgement of the acceptance dimension is more complicated and requires the study of EU and national groups’ communication structures and whether or not supporters are aware of their group’s EU activities and supportive of these. However, the acceptance dimension in Birdlife is partly expressed by their group memberships, who have the choice of being members of the umbrella and agreeing with Birdlife acting in their name.

Analysing the acceptance dimension, especially in a network of independent groups, would therefore require empirical investigation that is beyond the scope of the thesis. This thesis analyses EU groups and their organisational members (national member groups) with the aim of revealing the gaps in the literature and paving the way for further research. Whilst the case studies indicate levels of supporter acceptance, more systematic research needs to be carried out.

The differentiation of representativeness has crucial consequences for the implications of professionalisation. Firstly, the narrow understanding of professionalisation in the traditional sense of ‘bureaucratisation’ carries implications primarily for groups whose acceptability dimension is based on the traditional promissory representation. Here positions of a group are formed by the participation of members in a formal decision-making structure. The absence of the vote of members in formal decision-making structures in the promissory case negatively affects the representativeness of the position, or the representative claim. In the case of gyroscopic and surrogate representation on the other hand, the bureaucratisation or rather the absence of member and supporter participation in the formal position formation does not matter, since the position is formed based on scientific evidence and expertise on the ground (gyroscopic) and empathy
(surrogate) and because the acceptance dimension is a separate act from the acceptability dimension. Still, the informal communication with member groups is important in order to qualify the position formation based on experience on the ground. A crucial factor in gyroscopic and surrogate representativeness is that professionalisation may actually play a positive role in furthering the acceptance dimension: professionalisation in new media technology facilitates the mediation – and indeed the judgement - of support. In the case of promissory and anticipatory representation new media technology provides additional and more fluid and spontaneous channels for formal and informal participation in position formation as well as channels of group responsiveness to member and supporter attitudes (i.e. membership surveys: Maloney 2009, 283f).

The thesis promotes the communication of different academic strands in assessing the representativeness of groups. The traditional argument does not consider research in the representation literature on electoral representation (cf Mansbridge’ representation typology (2003), Sawards’ ‘representative claim’ (2006)) or indeed in the advocacy group field itself (cf Halpin’s group legitimacy typology for representative claims (2006) and Strolovitch’ affirmative advocacy (2007)). The traditional argument moreover ignores research in the cultural, communication and media studies on the impact and potential of new media technology for organisational structures and strategies (cf Castells 2001; Ward and Gibson 2009) and hence the dimensions of representativeness.

The above argument on the dimensions of representativeness and professionalisation suggests that the professionalisation of advocacy groups does not necessarily lead to a loss of representativeness. Indeed in some cases it has the potential to enhance representativeness. The Commission’s strategy to enhance its democratic quality through engaging with advocacy groups active in the general interest thus is not doomed.

The thesis carries implications for the interest group literature as well as the broader theories of democracy. Groups do not necessarily have
internal democratic representation structures, but they can nevertheless enhance the democratic quality of EU decision-making, because they are representative of the voices within civil society which they introduce to the policy debate (cf Maloney 2009, 284). Representation has so far been based on the restricted and uncritical assumption that representation is one-dimensional and only functions through upward electoral mandates. This study engages with progressive literature in the fields of electoral representation, advocacy groups, media and communication which have been largely unconnected and by applying these to environmental advocacy groups shows that representation is in fact multi-dimensional and varies according to organisational forms and strategies. This is not to say that the traditional representation through membership-logic or the bureaucratisation argument do not hold true anymore. They continue to be important insights into our understanding of interest group representation. But traditional conceptions of democracy are too narrow and restricted, ignoring the dynamics of organisational diversity and voice. Democratic theories do not only have to open up to supplementing channels of the peoples’ voices, but also to rethinking traditional forms of representation.

The research questions “do EU groups necessarily lose their representativeness as they professionalise?” and “is the loss of representativeness a result of professionalisation and specific to advocacy groups in the general interest, or is it due to organisational logic?” led the thesis. The originality of the thesis is that it approaches this question by differentiating between types of group representation and by distinguishing the acceptability from the acceptance dimension of representativeness. It connects progressive political party and interest group literature with the existing professionalisation argument. By doing so the thesis specifies and revises general assumptions of the effects of professionalisation on representativeness in the traditional literature. Furthermore, the thesis updates the definition of ‘professionalisation’ by going beyond the limited conception of bureaucratisation and includes the usage of new media.
technology. It thereby revisits and specifies the potential effect of professionalisation on group representativeness under the consideration of the different group and representation types. It is an original contribution to how group representativeness should and may be judged, not only, but in particular in the context of EU group professionalisation.

The thesis first reviews the literature on the representativeness and professionalisation dichotomy in EU groups in chapter one. It then challenges the traditional assumptions of representativeness and professionalisation, suggesting revised conceptions of the latter in chapter two. Chapter three determines the specific research questions that the thesis tries to answer, generates hypotheses and maps out the methods utilised to conduct the research and answer the questions. Chapters four (water policy) and five (emission reductions policy) apply the thesis’ conceptions and methodology to five EU groups in two specific policy cases in order to evaluate their representativeness and test the hypotheses. They analyse the findings of the case studies and their implications for the representativeness of professional EU environmental groups as well as for the assumptions in the traditional literature. Chapter six concludes with specific implications for the representativeness of environmental advocacy groups as well as broader implications for the interest group literature and theories of democracy. It further outlines the significance of the research for (EU) politics and environmental advocacy groups themselves.
2 EU recognition, professionalisation and representativeness

One important approach of the interest group literature argues that as EU groups are recognised as consultation partners in EU politics, they professionalise and as a result lose their representativeness (Kohler-Koch 2010, 111; Kohler-Koch 2008; Saurugger 2005; Sudbery 2003; Warleigh 2001). The following chapter first presents the European Commission’s (hereafter Commission) attempt to develop a genuinely democratic input into its decision-making and the theoretical basis for the strategy, which assumes group representativeness. It then portrays the argument in the literature that recognition leads to professionalisation and thus a loss of representativeness and the underlying theoretical and empirical conceptions and their history. It concludes by suggesting that groups are more diverse than the representativeness literature assumes and that professionalisation is broader than bureaucratisation, but also includes recent developments in new media technology application. Consequently, the thesis asks for a revision of the impact the professionalisation of EU groups is suggested to have on their representativeness.

The traditional argument about a professionalisation-representativeness dichotomy

The following section explains why the EU strategy is based on group representativeness. The interest group literature assumes that this representativeness is based on the participation of members in internal decision-making which is hampered by the professionalisation of internal
organisational structures (Kohler-Koch 2010, 111; Kohler-Koch 2008; Sudbery 2003; Warleigh 2001). EU groups, as they become recognised and professionalise thus lose their representativeness. This has negative implications for the Commission’s strategy to improve its democratic quality of decision-making.

The European Commission’s strategy

In order to improve the inclusiveness of its decision-making, the Commission has embarked on a strategy to bridge the gap with civil society via interest groups, such as groups advocating in the general interest – here defined as advocacy groups (White Paper on Governance 2001). This strategy is predicated on the assumption that advocacy groups are representative organisations where the leadership reflects the interests of the members.

The Commission has always sought stakeholder consultation in order to receive expertise and legitimacy. However, particularly since the general democratic deficit debate surrounding the EU, along with the crisis of the Santer Commission, the Commission, as a bureaucratic actor, has tried to apply new strategies to enhance its democratic legitimacy (Saurugger 2008a, 151).

One aspect of the democratic deficit raised by the literature, and by the Commission itself, is the Commission’s (and indeed the EU’s) distance

1 The principle ‘to integrate the people of Europe’ has guided the European integration since its beginnings that is the foundation as the European Community (European Commission 2001, 32). The Commission explains that even though the EU is neither like a national government nor can it “develop or deliver policy in the same way as a national government” (European Commission 2001, 32), people still expect the EU to do politics similarly to their national political institutions. Quoting the Commission, the EU has to meet citizens’ expectations, though in different ways. “[I]t must build partnerships and rely on a wide variety of actors” (European Commission 2001, 32).
2 Representativeness of civil society organisations is stressed several times in the White Paper on Governance (European Commission 2001) as a core criterion for the consideration of their input. The role of civil society organisations is further elaborated in the Commission’s Communication “Towards a reinforced culture of consultation and dialogue” (European Commission 2002).
3 See in particular the debates on input legitimacy, governance ‘by the people’ and participatory democracy (cf Joerges et al. 2001).
One solution to which high democratising potential has been attributed by Commission officials, as well as academics, is seen as the need to engage with civil society via civil society organisations (European Commission 2001; Greenwood 2007; Kohler-Koch and Finke 2007; Saurugger 2008; Steffek et al. 2008). This strategy is linked to participatory theory, which holds that groups act as democratising agents. Here advocacy groups’ democratising potential, in the form of stimulating political and civic engagement, is conceived as balancing out assumed deficiencies in modern representative democracy structures (Maloney 2006, 99). Interest group pluralism provides enhanced participation opportunities by recognising diverse interests in the form of interest groups, whose opinions can then be taken into account in the decision-making processes, alongside the traditional mechanism of parliamentary or assembly votes (Czempiel and Rosenau 1992; Schulze 1994). Participation is based on the ‘principle of democratic self-governance’ (qv European Commission 2002, 5), which implies that all affected interests must have equal opportunities to represent themselves in the decision-making process of these decisions (Steffek and Nanz 2008, 10).

The implicit assumption is that advocacy groups are representative organisations where the leadership reflects the interests of its members and supporters. Groups channel grassroots interests and opinions across the EU into Commission decision-making and thus bridge the gap between the Commission’s politics and European civil society (for reviews see Armstrong 2001; Greenwood 2007). At the same time, a better understanding and communication of EU issues and the Commission’s work is thought to enhance identification with the EU and ultimately engagement in and support for the Commission’s work – in other words the Commission aims to enhance its democratic legitimacy by making its

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4 It is the Commission’s mandate to consult civil society widely in the process of policy formation (European Communities 1997).
decisions based on a broader set of general interests and through genuinely
democratic group input.\textsuperscript{5} As part of its strategy, the Commission has set up
a lobby register and has published a number of guidelines for civil dialogue

Moreover, the institutional approach of the EU to engage with EU
umbrella groups encouraged a growth in the number of group ‘partners’,
which increasingly demand to be included as central protagonists in EU
governance (Broscheid and Coen 2007). The EU has seen a mushrooming of
EU level public interest associations as well as a booming participation in
consultations and forums since the 1980s and in particular during the
1990s and early 2000s (Kohler-Koch and Buth 2009).\textsuperscript{6} These increasing
numbers have stoked a discussion for a revised strategy of group regulation
amongst practitioners and scholars alike, re-visiting questions of the criteria
for consultation and, crucially, of the representativeness of groups.

The representativeness argument applies to two levels. Most scholars
evaluate the assessment of groups’ democratising qualities through access
and representation in formal participation mechanisms based on equal
chance of access at the population (system) level (Kohler-Koch and Finke
2007, 214).\textsuperscript{7} Representativeness in this approach is mainly couched in
terms of the balanced or imbalanced representativeness of interests at EU
level, often criticising the dominance of economic and large interests to the
disadvantage of general interests (for a review see Saurugger 2008, 1281-
1284). Equally important, however, is the implication of recognition for the

\textsuperscript{5} The European Commission in its White Paper on Governance (European Commission 2001)
expresses its wish for itself and the EU as a whole to be a legitimate, democratic player that is
respected and understood by the citizen. To achieve this, it strongly emphasises the need to improve
effectiveness of all governance processes with, within and amongst EU institutions on multiple
levels.

\textsuperscript{6} From 1986 to 1990 the number of interest groups at EU level was estimated to have increased
from around 600 to around 3000 by Anderson and Eliassen 1993).

\textsuperscript{7} The reform contains efforts to improve effectiveness, relevance and coherence of EU policies.
Criteria for the evaluation of equal chance of access are the accessibility of the political process, the
openness and transparency of consultations, the thresholds of access regarding different kinds of
interest associations and the turnout of all actors involved. As criteria for the analysis of equal
representation of group in (the always issue specific) consultations Kohler-Koch and Finke define the
approximation of the respective ‘policy-relevant cleavage structure’ (Kohler-Koch and Finke 2007,
216).
vertical organisation of group interests, their behaviour and hence their ability to bridge the gap. As yet this field is still under-researched, though a number of scholars have recently started to investigate this gap. Those studies that do look at the internal organisational structures of opinion formation and representation within groups and their networks tend to take on the perspective of parliamentary democracy and hence base representativeness on the existence of formal member participation mechanisms (Kohler-Koch 2010, 111; Sudbery 2003; Warleigh 2001).

The reformist approach bases policy proposals on a bottom-up approach via civil society involvement, including a reform, or rather adaptation, of EU governance aiming at opening up the EU policy-making process in order to get more people and organisations involved in shaping and delivering policy (European Commission 2002, 5).\(^8\) In the reform documents\(^9\) the Commission emphasises its “duty” to consult and consultations are understood to improve the quality of the Commission’s input as well as output (European Commission 2002, 5). Engagement in the Commission is specific to the different policy areas, because implementation of consultation practice is left to the different DGs and because the emergence of topics at EU level varies from issue to issue.\(^10\) However the Commission’s recent reform is aimed at a more coherent approach to consultation across Directorate Generals and potentially with other EU institutions and has made it obligatory for EU advisory bodies to hold consultations with groups (European Commission 2001).

\(^8\) Cooperative principles such as plurality, equality and transparency in the decision-making process and cooperative procedures are set as priorities.

\(^9\) Several steps form part of the EU governance reform aiming to better structure the EU’s relationship with civil society, most importantly the ‘principles of good governance’ (European Commission 2001), ‘general principles and minimum standards for consultation’ (European Commission 2002) and enhanced transparency (European Commission 2008).

\(^10\) The environment for example was first recognized as an area of competition for the EU in the Single European Act (1987). The Aarhus convention, adopted 1998 and taking effect 2001, provides a legal basis not only for the EU but for all UN member states to ensure the provision of access to environmental information, the facilitation of public (including its own organisations) participation in environmental decision-making processes and access to courts regarding environmental issues (access to justice).
The civil dialogue includes a broad-ranging number of actors considered to be civil society organisations, amongst them general interest groups. The Commission bases the definition of group representativeness on “encompassingness (peak federations) and geographical coverage (funnelling [member states’] groups into a single voice)” (Greenwood and Halpin 2007, 200). The interests of groups that are considered representative are considered to be more significant in terms of input to policy formation by the Commission. The issue of representativeness is addressed by the criteria for the identification of relevant groups. Firstly, there are general criteria: groups must be affected, involved in the implementation process or have a direct interest. In the case of consultations with limited access “for practical reasons” (European Commission 2002, 11), such as participation of groups in advisory bodies or at hearings, the Commission refers to more detailed eligibility criteria for the civil dialogue, which have been defined by the Economic and Social Committee. Amongst other criteria, groups have to “provide for accountability to its members; have authority to represent and act at European level” (Sub-Committee European Governance (White Paper) 2002). Thus representativeness is judged by a group being accountable to its members, suggesting a principle-agent relation. This in the literature

11 [O]rganisations [...] include: the labour-market players (i.e. trade unions and employers federations - the "social partners"); organisations representing social and economic players, which are not social partners in the strict sense of the term (for instance, consumer organisations); NGOs (non-governmental organisations), which bring people together in a common cause, such as environmental organisations, human rights organisations, charitable organisations, educational and training organisations, etc.; CBOs (community-based organisations), i.e. organisations set up within society at grassroots level which pursue member-oriented objectives, e.g. youth organisations, family associations and all organisations through which citizens participate in local and municipal life; and religious communities” (European Commission 2002, 6).
12 In practice, however, it is not clear whether representativeness is measured according to the number of members, the geographical inclusiveness or according to the recognition at national level (Saurugger 2008, 1282).
13 “In order to be eligible, a European organisation must: exist permanently at Community level; provide direct access to its members’ expertise and hence rapid and constructive consultation; represent general concerns that tally with the interest of European society; comprise bodies that are recognised at Member State level as representatives of particular interests; have member organisations in most of the EU Member States; provide for accountability to its members; have authority to represent and act at European level; be independent and mandatory, not bound by instructions from outside bodies; be transparent, especially financially and in its decision-making structures” (European Commission 2002).
implies groups’ representativeness is judged by their ability to include membership in formal participation structures.

At the same time the Commission establishes the need to consider the impact of policies on other areas such as environmental interests, any need for ‘specific experience, expertise or technical knowledge’ and demands to maintain a balance between different actors.14

Thus the Commission’s discourse addresses EU advocacy groups, who are assumed to be representative of their members, in order to enhance its democratic qualities. In practice, however, Commission officials seem rarely to be aware of the existence of their own NGO governance guidelines with regards to representativeness. The impression derived from interviews conducted by the author with both Commission officials and groups is that the Commission is guided less by testing representative criteria and more by the reputation of groups (interviews with Commission officials, 2010; interviews with environmental groups, 2010/2011). Similarly, in the European Parliament there is no formalisation of interest representation (see Bouwen 2007; Kohler-Koch 1997). The Council in particular works with groups on an apparently grace-and-favour basis rather than through a structured dialogue with clear conceptions of representativeness (Beger 2004, 4).

14 For obvious reasons of efficiency and effective cooperation it is undesirable for the Commission to consult everyone on everything. However, acknowledging the “challenge to be adequate and equitable” and the risk of biased participation, the Commission expresses the wish to reduce the risk of one-sided involvement of arguments and privileging access for particular groups. For these reasons, the Commission called for “clear criteria” to identify “target groups of relevance” for consultation (European Commission 2002, 5). Concerned with its credibility, in the governance reform documents the Commission not only emphasises its own duties in a closer partnership, but also demands responsibility and accountability from groups (European Commission 2001). The governance reform documents, including the Transparency Initiative, also turned the attention of the debate towards the transparency and accountability of groups in response to co-optation concerns through special treatment and funding. Part of the move towards group responsibility and transparency is the voluntary register for ‘lobby groups’ in an attempt to provide a better overview on who lobbies, where group financing comes from, who their members are, what fields they are active in or how many staff work for them. Moreover, the register serves as online database which the Commission and potentially other EU institutions can refer to when in need of expertise. Even though the register is voluntary, the Commission expects any interest groups carrying out “activities […] with the objective of influencing the policy formulation and decision-making processes of the European institutions” to register. Any registrant is also requested to comply with the code of conduct or any comparable rules. If a group does not register or supply the Commission with transparency through other means, its consultation input is treated as that of an individual.
History of the Commission’s strategy

At EU level, the broader interest group debate was instigated by the introduction of the Single European Act in 1987 and its official mandate to develop and institutionalise a European Social Dialogue, culminating as legal commitment in the Lisbon Treaty (Saurugger 2008, 149). However, this was initially and principally about investigating the role of groups as a driving force of European integration, with emphasis on social and private actors (Kohler-Koch and Finke 2007, 210). The Commission introduced new consultation instruments, including specific funding schemes, depending on the European Commission Directorate Generals and their staff. Public interest associations generally were not consulted by the Commission; however environmental associations and consumer organisations were the exception, because they “were perceived to be directly affected by and important for the efficient design of common market policies” (2007, 209), also excepted were some human rights and women’s groups. The literature at the time observed the relations and processes between European regulatory bodies and interest group leadership and criticism was being directed at too autonomous bureaucracies and leaderships as well as strong national groups.

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15 In the 1980s an “official mandate to develop and institutionalise a European Social Dialogue [...] was included in the Single European Act in 1987 and officially introduced in the Maastricht Treaty in 1992” (Kohler-Koch and Finke 2007, 210).
16 Two aspects have been major drivers for a more open, inclusive and transparent integration of groups: One, bureaucratic forums looking for power and legitimacy and two, the crisis of the Santer Commission, which provided an “institutional window of opportunity” (Saurugger 2008a, 151).
17 In general, during the first decades of European integration, engagement of stakeholders in EU politics was aimed at improving the quality of the Commission’s policy proposals and focussed on actors interested in economic integration: European confederations of trade and industry associations, employers’ associations, professional associations and trade unions (Kohler-Koch and Finke 2007, 209). Important changes were the ‘more persistent social dialogue’ and the introduction of the ‘principle of partnership’ and the term ‘social partners’. This was not only valid for EU level consultations, but also – in accordance with the prominence of cohesion and regional policy at the time - for the dialogue with private and social partners at the national and sub-national level (Hooghe 1996). The development of the relation between the EU and society is summarized by Kohler-Koch and Finke (see also Greenwood 2007, Smismans 2005), who detect a ‘generational’ change from a hierarchic and technocratic approach in the 1970s/80s to ‘partnership by invitation’ in the 1980s/90s and to emphasise on democratic legitimacy and ‘full partnership’ and a more heterarchical conception of societal groups as ‘partners’ since the 2000s (Kohler-Koch and Finke 2007, 209-212).
Greenwood, Grote and Ronit for an overview up to 1992). Whilst attention in the 1990s was on the interest group system as such and its role and design for European integration (Greenwood 1992; Greenwood 1997; Streeck and Schmitter 1996), in the decade of the 2000s a debate evolved looking at the relationship of the EU and society and the democratising agency of groups in the frame of the EU’s and Commission’s democratic legitimacy - ‘bridging the gap with civil society’ (cf Smismans 2005, 77). After the Santer Commission, which was forced to resign after allegations of fraud, the EU entered a time of reconsideration regarding its governance and future. Romano Prodi (president of the European Commission 1999-2004) encouraged the concept of civil society with respect to a wider inclusion of interests on the one side and deeper participation opportunities at all levels of the political process on the other (Kohler-Koch 2010, 102f). In its Governance Paper of 2001, the Commission argues there is increasing distrust and/or a lack of interest towards EU institutions amongst citizens and moreover citizens feel that the EU is remote and too intrusive at the same time. In the 2000 Communication on the European Commission and groups and the White Paper on Governance (European Commission 2001) the Commission made clear that civil society dialogue is an “attempt to legitimate itself and its functions” (Smismans 2005, 74) (Smismans 2003, 481) see also (Smismans 2005, 77). In order to boost citizens’ confidence the Commission proposed to get the EU closer to the people. This opened the way to cooperation with general interest groups and the focus shifted from representative to participatory democracy (Saurugger 2008a, 151). The failure of the Maastricht Referendum in Denmark and its near failure in France in 1992 also led the Commission to deviate from its narrow focus on the improvement of the quality of policy output and to also consider member states’ acceptance of its policies. This is where the strategy ‘bringing the EU closer to the people’ emerged; “propagated at the 1996 Turin Summit [it] became the norm to follow by all EU institutions” (Kohler-Koch and Finke 2007, 210). This meant a renewed interest in the democratising agency of interest groups, in particular those
active in the general interest. The ‘civil dialogue’ was hence introduced, initially in the field of employment and social affairs in 1996, where the Commission facilitated the establishment and funding of the umbrella association for EU general interest associations active in the latter field, the Social Platform.

The attention of EU participatory scholars turned predominantly to the Commission, since its mandate to represent the common interest of the EU means it has to engage with stakeholders. Because the Commission has the right to initiate legislation and the Parliament enters the legislation process at a rather late stage, the Commission has also been the main institutional focus of groups’ activities in their attempt to influence political decision-making. It is thus not surprising that it is the Commission (as bureaucratic actor) that explicitly calls for the enhancement of democratic legitimacy through bridging the gap with civil society (European Commission 2001; for empirical studies (Eriksen and Fossum 2002, 402); Kohler-Koch and Finke 2007, 217). The interest group literature has hence been prioritising the scrutiny of characteristics and impact of access conditions on the democratic credentials of the Commission.

As European integration was originally and primarily about economic integration, the Commission’s intention was to get support to push through its social policies with the help of the social partners and special interests

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18 The EU Economic and Social Committee, as institutionalised advisory body of the EU, also interacts with groups, though historically and primarily with economic and social partners. For the EU Economic and Social Committee it is the fight against its marginalisation in the European polity as well as the definition of its own role that made civil society a useful tool for them (cf Smismans 2005, 77). However, though it institutionalised its engagement with public interest associations, the inclusion remains random (Kohler-Koch and Finke 2007, 209).

19 For an example see DG Environment: groups are considered valuable for EU decision making “since they have a good understanding of public concerns on the environment. Their presence is important to provide a sound balance in relation to the interests of other actors. European NGOs are valuable in co-ordinating and channelling the views of national organisations and citizens as input to the decision making process. For the development and implementation of policy, they also participate in preparatory work and expert groups and conduct research and studies. Another example of an area where NGOs play an important role is awareness raising and environmental education” (DG ENV funding website, accessed 28/12/2009: http://ec.europa.eu/environment/ngos/index_en.htm).

20 See in particular the debates on input legitimacy, governance ‘by the people’ and participatory democracy (cf Joerges et al. 2001).
As a result, though the Commission’s mandate is to consult a broad range of civil society organisations, it - still - attaches particular importance to the role of traditional social partners, trade unions and employers associations, “because of their representativeness” (European Commission 2002, 6, footnote 7).

Recognition leads to professionalisation and a loss of representativeness

However, according to one influential body of literature, the Commission’s strategy is inherently flawed, because it is assumed that recognition and representativeness are incompatible. Recognition co-opts EU advocacy groups who then cease to be representative of their members, or grassroots (Kohler-Koch 2010, 111; Sudbery 2003; Warleigh 2001). In particular, the professionalisation of advocacy groups that results from a formalised relationship may hamper representativeness, thereby undermining their democratic agency and hence the claim of the Commission to democratic legitimacy (Frantz 2007, Maloney 2009, Saurugger 2008, Kohler-Koch 2008).

After initial high hopes concerning advocacy groups’ ability to bring the EU closer to the citizens (Greenwood 1997), theoretical debates on the potential of the Commission’s strategy were followed by empirical studies, revealing practical difficulties with the groups’ abilities to bridge the gap. EU groups themselves are found to professionalise their structures in similar levels of hierarchy to the EU, ranging from the local activist group to the EU umbrella level, and hence criticism is made that groups have the same bureaucratic problems of bridging the gap within their own organisations and networks that the Commission is struggling to overcome. In order to enhance democratic input via the group linkage function, the Commission aims to enhance the aggregation and channelled

representation of mostly issue-based\textsuperscript{22} (sectoral) interests (see Greenwood 2007 for an encompassing study of EU interest groups). The representation of groups in the EU is consequently highly hierarchically organised and streamlined. Groups are highly institutionalised and mostly organised in confederations with multi-level and transnational organisational (EU) membership (Greenwood 2007, 342). Communication with the Commission is only guaranteed within the EU umbrella and the communication with indirect member group levels and networks (national and subnational members) has been emphasised by the EU as the groups’ own responsibility (Opinion on ‘European Governance – a White Paper of 20 March 2002; CES 357/2002). Basically, the Commission is thought to be trying to improve its communication and democratic quality with the help of groups who themselves have problems including grassroots in internal communication and opinion formation (Kohler-Koch 2010, 111; Sudbery 2003; Warleigh 2001). It is often criticised that these elite groups are not internally democratic themselves and thus cannot improve the democratic credentials of the Commission either (Warleigh 2001, 623). At the individual group level, empirical studies criticise the Commission’s strategy as flawed, due to changes in internal organisational structures as a result of recognition demanding professionalisation. Interest groups in general are seen to professionalise as they adapt to the perceived access structures of the EU interest representation system (March and Olsen 1998; Saurugger 2006). Part of these access conditions are factors such as recognition mechanisms, choice and selection of groups the EU engages with and regulating mechanisms, such as funding and privileged access which may have a reverse impact on groups and their ability to represent the diverse voices of civil society (Greenwood 2007; Kohler-Koch and Finke 2007; Saurugger 2008; Maloney 2009).

\textsuperscript{22} A minority of groups have a territorial focus.
Groups thus professionalise, because they are required to be experts in order to have access to the Brussels game, and they have to be professional in response to the Commission’s demands for expertise. Both pressures for expertise are considered to lead to groups’ organisational structures and strategies becoming more professional (Frantz and Martens 2006, 62–77).

Any system that includes certain groups in the design but leaves others out, presents them with the need to decide between being ‘in’ or ‘out’. To be influential, lobbyists have to have a very sophisticated understanding, of and connection to, EU institutions and EU member states, because power is more dispersed in the EU (Hull 1993, 85). At the same time, the EU’s multileveled and segmented institutional context makes it difficult to identify general patterns of interest mediation (Eising 2007, 356). Moreover, the mushrooming of EU groups (Kohler-Koch and Buth 2009) and their increasing demand to be included as central protagonists in EU governance (Broscheid and Coen 2007) has increased the competition for ‘ear-time’ amongst groups and further increased pressures for expertise. This includes the advocacy groups’ very own wish to have political influence in a situation of competition with other big interests groups, such as business groups, over who is heard and who affects the outcomes (Bosso 2003). This in turn requires a focus of group resources on the Brussels game, which is assumed to be at the expense of internal member participation. In practice most groups try to balance lobbying and mass mobilisation strategies. However, group literature fears recognition might tip the balance towards lobbying at the cost of mobilising member participation. Groups adapt their organisational orientation to these political and institutional conditions of influence. Groups intensify their EU lobbying efforts where EU regulation is in place and divide their labour according to the EU policy cycle, including lobbying in the very early stages of the policy cycle (Eising 2007, 356). Greenwood points out that EU regulation is offering many incentives for institutionalised participation.
‘disincentivising’ mass mobilisation; encouraging elite, often confederated groups (Greenwood 2007, 356). Groups are considered to become streamlined and to be moving away from grassroots representation. In other words, groups put the majority of their time and resources into ‘logic of influence’ activities at the cost of ‘logic of membership’ (cf Schmitter and Streeck 1999). Groups at EU level have to be well structured and efficient to fulfil the Commission’s expectations and function as representative promoters of civil society interests as well as ‘schools of democracy’ (Maloney 2009a, 2). This principle however is assumed to be at odds with the requirements of groups to act in a representative and democratically legitimate manner (Maloney 2008; Maloney 2009; Kohler-Koch 2008a; cf Saurugger 2006). According to the professionalisation argument, groups tend, due to lack of financial and human resources, to prioritise effectiveness over member participation. In other words, they seek to improve their responsiveness to decision-making bodies and their ability to deliver an opinion rapidly. They thereby strengthen the EU’s policy output, but do not necessarily increase democratic input (Sudbery 2003, 75).

In this context, a further school of interest group scholars discusses functional representation, as opposed to the representation of (political) values, resulting from the European Commission’s own search for legitimacy (Smismans 2003) and competencies (Bouwen 2007, 278), or the design of the Commission’s consultation regime (Quittkat and Kotzian 2011, 416). These authors engage with the question of how group professionalisation impacts the legitimacy of EU democracy, particularly referring to input and output legitimacy (Bouwen 2006; Greenwood 2007b; see also Scharpf 1999). Since this thesis’s main concern is with representativeness, it relates only tangentially to legitimacy, or indeed to functional representation. The representativeness of groups is an important aspect of their organisational legitimacy, however, the two concepts are distinct and different (Steffek/Hahn 2010, 8). For the concept of legitimacy of non-governmental organisations, see Risse (2006), Schrader and Denskus
(2010, 29-54); for democratic legitimacy as a category for assessing the conduct of non-governmental organisations, see Steffek et al (2010, 100-128); and on procedural legitimacy, see Beisheim and Dingwerth (2010, 74-99).

Other empirical scholars consider that recognition by the Commission neglects group representativeness and in fact does not value representativeness and political representation via groups, but instead values expertise. 23 Hence it promotes expert groups with “useful information and leverage” (Warleigh 2000, 239) over groups representing citizens or shared values (Warleigh 2000, 239). Klüver detects a biased access to EU consultations and influence of Commission decision-making in favour of resourceful and professional groups (2012). Further instigators of professionalisation are the Commission’s demands for rapid responses (Heggli 2010: 247). The Commission’s reform papers express the demand for professional representation: “[i]n order to be eligible, a European organisation must: provide direct access to its members’ expertise and hence rapid and constructive consultation” (Sub-Committee European Governance (White Paper) 2002).

Effective organisation and efficient representation of interests is thus a prerequisite for access and voice at EU level. These professionalisation demands are thought to have an impact on organisational structures and strategies by empirical interest group scholars (Frantz and Martens 2006, 62–77). A professionalisation of groups is detected at the international (cf Keck and Sikkink 1998, on the EU: Lahusen and Jauß 2001; Saurugger 2006) as well as at national levels (Jordan and Maloney 1997; Kristan 2007; Frantz and Martens 2006, 62-77). In addition to their political message, good

23 Saurugger argues EU level participation is still linked to EU forms of interest representation which is strongly influenced by the EU’s institutional need for expertise and legitimacy and less by the idea of creating new forms of political representation at EU level (2008, 1286). Sudbery’s fieldwork revealed a similar response from Commission officials who affirm that the inclusion of civil society is to achieve effective results and the argument to ‘bring in the citizen’ is simply for rhetoric (Sudbery 2003, 92).
performance and marketing as well as political campaign management, in particular lobbying, are said to have moved to the centre of group activities, thereby neglecting grassroots connections and membership communication (Jordan and Maloney 1997; Lahusen and Jauß 2001; Frantz and Martens 2006, 62-77; Frantz 2007). Frantz and Martens describe how, over the last two decades, the internal organisational structures and strategies of non-governmental organisations have changed from voluntary organisers of temporary protest events towards business-style enterprises. Groups employ qualified full-time staff that have a professional rather than grassroots approach to their portfolios. They employ specialist staff with knowledge of very technical and EU agenda issues. Groups are well-organised: they pursue political-strategic planning, consider conditions of political processes, and aim to market their own brand. Ultimately the perceived danger is that groups strive for organisational survival, rather than for the realisation of political content (Frantz and Martens 2006, 75ff). The fear is that this will lead to segmented and hierarchically structured civil society elites detached from their grassroots (Saurugger 2006; Kristan 2007, 63).

Professionalisation is visible in changes of organisational shape, structures and strategies affecting size, relations and composition of groups and their efficiency. One main criterion of professionalisation is size, both in financial, as discussed above, and human resource terms. Professionalisation is not only defined in groups managing large funds, but in particular managing discretionary funds (Saurugger 2006), over which the membership has little or no direct say. What this implies is that members cannot participate in the formal decision over which interests should get financial support to be furthered in political representation. Professionalisation in terms of group size also refers to the increasing number of full-time staff employed to fight for the respective cause as opposed to volunteers. Staffs are increasingly trained in professions such as law and communication and have no or little grassroots experience. The
implications are considered to be weakened links between grassroots membership and leadership. More and more groups are detected as employing representation professionals and law firms as opposed to their own members and staff, though these studies often refer to non-governmental organisations that are not necessarily active in the general interest (Saurugger 2006, 268f). They increasingly use scientists and experts for the formation of their claims. Both strategies increase expertise but are seen to lower efficient grassroots input. The establishment of offices, or special sections in governance headquarters such as Brussels, as well as groups having regular contact persons for Commission meetings are a sign of professionalisation. According to advocacy group staff, some Commission officials interpret having established contacts as a lack of contact with the ‘real’ citizen or grassroots (Heggli 2010, 247).

Professionalisation means a consolidation of organisational structures and a centralisation of decision-making structures not only for efficiency reasons, but also, because hierarchical structures are believed to be the only way for a group to be territorially and functionally representative (Kohler-Koch 2010a). Geographical and functional representativeness are both access requirements of the Commission. However, a centralisation of decision-making is thought to lead to key or relevant office staffs taking decisions with supporters having no say. A shift is detected from membership to management strategies, where activists are replaced by communication professionals. Elitist structures emerge where specialised, professional lobbyists, scientists and public relations staffs spearhead sophisticated management structures. Groups have sophisticated fundraising departments or even outsource canvassing and recruitment, making them more responsive to donors’ demands at the cost of constituencies’ demands. There is an increase of individualistic participation (such as signatures), of long-term-passive supporters, and of donors as opposed to active and engaged members with participatory rights. These tendencies towards a prevalence of groups with
professionalised recruitment and maintenance activities, with a low-cost form of involvement, are also referred to as ‘protest-business types’ (Jordan and Maloney 1997). They are characterized as groups who have large supportership with no formal organisational decision-making rights, including virtual supportership, and no membership with rights to formal participation. Last but not least, professionalisation, as assessed above, and the wish to have an impact are pictured as leading to a move from contentious to conventional politics, thus co-opting original demands, as groups start to moderate their tactical and ideological approaches. In sum, the effects of professionalisation are portrayed as a prioritisation of expertise and knowledge vs. membership mobilisation, efficiency vs. democratic legitimacy and accountability, professionalism vs. volunteerism and effectiveness vs. street credibility.

Part of these access conditions is sufficient funding to get access and stay involved (on the conditions of representation of national interest groups in the EU see Klüver 2010). Groups who manage large funds are considered professional and the particular sources of funding are considered to have an impact upon the ‘disconnect’ from their bases and original ideology. A high percentage of patronage in the EU and US (money from governing bodies) is considered to make members unnecessary; instead members in the traditional sense become a luxury (Maloney 2008). Moreover, some authors fear a ‘disconnect’ and co-optation of original demands, because EU funding serves the Commission’s Directorate-Generals’ lobbying capacities and hence their own legitimation rather than group member participation (Maloney 2008). Civil dialogue is seen to be restricted to those issues on which EU institutions consider consultation with civil society (organisations) to be important (“partnership by invitation”, Kohler-Koch and Finke 2007, 211)24 and hence dubbed as EU

24 The Commissions principles and standards of consultation do not apply to all consultations, reasoned with the principle of proportionality and the need for effectiveness. Proposals are to be consulted on if they are considered by the Commission to have a significant impact on the sector, relevant parties or policy reform, as well as on Green Papers (European Commission 2002, 15).
institutional rhetoric (cf Smismsans 2005, 70). Others again mention that the need for funding has forced groups into outsourcing their canvassing and recruitment in order to find new sources of funding and maintaining their membership. This is seen to disconnect in particular national offices from members and grassroots, because the latter have no emotional or personal ties with the group itself anymore. The result is considered a loss of ‘meaningful engagement’ (for studies on US environmental groups see Fisher 2006); for a general overview see Maloney 2009). The need for and focus on fundraising in itself as well as the wish to have an impact via this strategy is believed to lead to a vicious circle of more and more focus and search for funds and organisational survival and less furthering of substantive views and high risk protest (Everett 1992), directly and actively engaging members. Hence the leadership prioritises the search for and maintaining of organisational funding over the representation of grassroots interests (influence versus membership logic) to the degree that it will moderate its ideologies and tactics to obtain funding (Everett 1992).

To summarise, the professionalisation of organisational structures and strategies is assumed to increase the gap between what EU umbrella groups put forward as the opinion of civil society members and what the grassroots civil societies, or rather their members and supporters, opinion actually is (Kohler-Koch 2008; Saurugger 2008). Some of the assumptions are that groups apply modern marketing strategies to market their positions and gain support, rather than focus on bottom-up opinion formation; they employ experts who know about the issues in question but not about grassroots opinions; they employ full-time workers with a business sense rather than volunteers who are passionate about a cause, and organisational structures become streamlined to be more effective rather than inclusive (Frantz 2007; 2005). The latter concern includes a change of decision-making structures and the rise of groups with decision-making structures that exclude members from participation in opinion formation and reduces their role to financial supporters, so-called cheque-
book participation, and campaign supporters. The worry in the literature is that EU groups are hence no longer representative of their members’ interests. As groups, or rather their EU leaderships, become recognised as political actors and transnationalise (Frantz 2007), they become more and more professional and as a result lose their representativeness (Frantz 2007; Maloney 2008; Saurugger 2006). This is due to changes in groups’ internal organisation (cf Saurugger 2006; Kristan 2007; Maloney 2008; Kohler-Koch 2008a; Maloney 2009a) and hence in other words they lose the ability to speak for their rank-and-file. Professionalisation as a result of recognition is increasingly regarded in the literature as threatening to result in the creation of specialised and isolated EU level groups (cf Saurugger 2008; Maloney 2009). The strategy to engage civil society representatives of umbrella associations is considered to lead to a narrow dialogue, neglecting grassroots organisations, enhancing co-optation and a change in the resource focus of groups towards the EU level as opposed to internal opinion formation and decision-making. Thus the integrity of vertical communication and participation within these organisations, particularly with national and sub-national members, is seen to be threatened. The risk portrayed is a separation of EU level concerns from the members and recognition in the light of institutional opportunities and resource dependencies is thought to affect ability to actually be representative (Sudbery 2003, 89f; cf Saurugger 2006). Scholars consequently criticise groups’ ability to bring the EU closer to the citizens (Smismans 2002) and act as democratic agents for EU decision-making (Saurugger 2006; Maloney 2008; Saurugger 2008).

**Theoretical and empirical assumptions of the traditional view**

This thesis argues that the view in the traditional literature on how groups professionalise and why they lose representativeness is too narrow.
Recognition, or professionalisation, and representativeness are not irreconcilable or incompatible. One of the reasons people construct this dichotomy is because it is based on an out-dated, narrow notion of representation, conceptionally (cf Mansbridge 2003; Saward 2006; Halpin 2006; O’Neill 2001) and practically. Therefore the Commission’s strategy may not be doomed.

The theoretical assumptions for the concept of group representation are, as argued here, derived from representative democracy theory. Advocacy groups active in the general interest are assumed to have the same organisational structures and strategies of representation as political parties. Moreover, the assumption of a trade-off between recognition and representativeness has already been suggested in other interest group literature, based on the very same traditional logic of representation. Corporatist and party political studies detected developments away from the representation of rank-and-file and a mellowing of interests as a result of organisational centralisation and professionalisation (Michels 1911; for decreasing social anchorage see also Katz 1990; Katz et al. 1992; Mair and Biezen 2001; Poguntke 2002). Advocacy groups drawn into formalised relationships with the Commission are thought to experience the same kind of tensions and developments towards bureaucratisation.

The following section explains the theoretical and empirical underpinnings for the representativeness-professionalisation dichotomy argument in the traditional literature.

The theory behind the narrow representativeness conception

The concept of representativeness is out-dated, because it relies on a traditional understanding of member representation through internal democratic participation structures. Most research in political representation has been carried out by democracy scholars, or more precisely parliamentary democracy scholars, who research political
representation. This explains why representation has always been connected to democratic legitimacy and specifically free and fair elections (Rehfeld 2006, 18). In particular since Olson (1965), the theory concerning the legitimacy of political groups has also been derived from representational democracy and hence their representativeness is based on representative democracy standards (qv Halpin 2006; Kohler-Koch 2009, 55). In his contested (cf. Marsh 1976) economic rational choice theory, he focused on the democratic legitimacy of (economic) lobby groups. Olson maintained that not all interests will organise, and argued that the logic of collective action will lead members of (large) groups to join and to act in the group’s common interest only if motivated by personal (economic, social) gains. As he himself declared, his theory is not appropriate for explaining general interest groups active on behalf of the common good as opposed to primarily their own direct benefit. Moreover, in Olson’s view membership matters for representativeness, because representativeness depends on the personal gains of members. However, in groups claiming to represent a cause such as biodiversity, it is not individual members which the group claims to represent. Personal economic and social gains are not the core motivating factor, even though common goods are by definition ultimately beneficial for the broader society.

An active membership democratically participating in the decision-making of a group is seen as the means of achieving representation. The constituency authorises the electoral representative who is accountable to the constituency. Hence the focus of interest group literature in terms of groups’ democratic potential has been on the mobilisation of membership participation (Jordan and Maloney 2007; Warleigh 2000; 2001). Therefore the impact of recognition or rather professionalisation on the representativeness of advocacy groups is generally evaluated based on the assessment of internal democratic structures – the ‘membership-logic’.

Looking at the normative theories applied to understand advocacy group representation and their contribution to the EU democracy provides
an insight into how normative approaches conceptualise representativeness. The strategy to enhance the Commission’s democratic credentials via the engagement with advocacy groups is based on the broader participatory theories such as (neo-)pluralism (Chambers and Carver 2008), deliberative democratic theory (Dryzek 1990; Bohman 1996; Habermas 1996; Dryzek 2000; Cohen 1989) (Kohler-Koch and Finke 2007, 214) or associative democracy (Hirst 1994; Roßteutscher 2000; Cohen and Rogers 1995; cf Saurugger 2007). (Neo-)pluralism and associative democracy rest the democratising effect of groups on their representativeness of member views. This is because the enhancement of the democratic quality of decision-making through associations is based on assumptions that firstly, they provide citizens with the opportunity to influence political decision-making by channelling and representing citizens’ interests in political deliberations and decision-making (Curtin 1999; Sudbery 2003, 86). They act as intermediaries or transmission belts between the EU citizens and EU decision-makers (Kissling and Steffek 2008, 208). Interest groups are considered to extend both the range and depth of citizen’s capacity to participate in politics beyond the electoral vote. Citizens can choose when and where to get active, which in turn enhances their satisfaction with participatory opportunities (Maloney 2006, 99). Representativeness in the liberal democracy theory or pluralism framework is an attribute of groups, a pre-requisite for participation in policy-making. Here, representativeness together with responsiveness, are criteria to measure democratic representation, in other words how well authorisation and accountability mechanisms function in groups (Kohler-Koch 2010, 107). Associative democracy scholars specifically argue that it should be interest groups rather than individuals participating in governance, because of their ability to raise system efficiency whilst at the same time assuring that it is effectively impossible for every citizen to individually participate in every decision.
citizen participation (Hirst 1994; Cohen 1995; Schmalz-Bruns 1995). But also deliberative theory emphasizes the additional and moreover more direct intermediary function of groups between governments (Kohler-Koch and Finke 2007; Steffek et al. 2008) or rather in this case the Commission, and the transnational publics (Kissling and Steffek 2008, 208). It recognizes groups as democratically legitimate actors, because their actions are assumed to be representing the diverse interests of the ‘base’, general values and are based on civil society’s trust (Greenwood 2007; Kohler-Koch 2007). The deliberative approach to enhance democratic legitimacy is hence through more and better quality of deliberation. Groups voicing societal issues of civil society and raising awareness about EU and international level issues are understood to create the infrastructure required for deliberation (Warleigh 2001; Finke 2005). They publicly communicate and deliberate, voice citizens’ concerns and force issues on or up the political agenda (Warren 2001, 70–93; Steffek, Kissling et al. 2008). Individual group representativeness is hence not relevant in deliberative democracy, rather it is the communicative capacity of groups, the diversity of views voiced, the quality of the deliberative discourse and its publicity or rather the connection of the discourse across EU multiple levels (Kohler-Koch 2010, 107). Whilst representativeness in participatory theories is conceptualised as the representativeness of member and

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26 “This argument is based on the classical idea developed by Truman (1951) that the representation of interests through the group system is certainly neither perfect nor without bias, but that the diversity of groups helps to preserve a rather equal representation of all interests” (Saurugger 2008, 1277).

27 “Deliberation is central to democracy, because it focuses political debates on the common good: in fact, it is the interests, preferences and aims that comprise the common good that ‘survive’ the process of deliberation” (Steffek and Nanz 2008, 5).

28 Kohler-Koch and Finke (2007, 214) specify three ways in which deliberation in the public sphere is valuable to a political system: agenda-setting, the generation of reasons by the public sphere which can be used by decision-makers to justify their actions based on the general interest, and the generation of ‘better-reasoned decisions’, because debates are not restricted by formal rules (such as in parliamentary debates). Groups in political deliberations may not only widen the range of interests but also of arguments and concerns in a major way (Kissling and Steffek 2008, 208).

29 Civil associations are moreover believed to have developmental effects, in other words civil associations help to educate citizens in political skills and civic virtues (Putnam 2000). Moreover, groups help building a transnational identification (Keck and Sikkink 1998; Sudbery 2003). The combination of these roles is assumed to create a ‘sense of ownership’, an identification with the EU, ultimately ensuring stability (Sudbery 2003, 95).
supporter views and is considered a pre-condition for democratic participation, in deliberative theory it is the representativeness of the population of groups as a whole, also called “system representativeness” (Borragán and Smismans 2012), that make interest representation a democratic contributor to decision-making.

Since deliberative theory is popular with EU participatory democracy scholars, this might explain why the majority of EU studies on groups' democratising potential, professionalisation and representativeness neglect the internal group organisation and behavioural dimension, but focus on equal and diverse access and influence (Kohler-Koch and Finke 2007, 214). Nevertheless, although officially promoted in EU documents, the participatory practice at EU level is not along deliberative criteria, but resembles associative democracy (Saurugger 2006).

The restriction of most interest group studies to access and representation in formal participation mechanisms (see the 'principled conception', Kohler-Koch and Finke 2007, 214) lead scholarship to traditionally discuss representativeness in terms of equal access and participation, and thus of the interest group population as a whole. The question is how representative the landscape of groups with access to and influence through consultations and other participatory mechanisms is, with regards to the diversity of interests represented and the types of interest groups representing (Greenwood 2003; Kohler-Koch and Finke 2007, 217). Whilst the individual (internal) group perspective analyses the ability of groups to act as democratising agents, the population perspective analyses the conditions for the realisation of democratic agency. Both the population as well as the internal conception assume that groups have to

30 The ‘functional conception’ they present in the context of the EU on the other hand is much more complex and takes into account the contribution of civil society to the democratic quality of the entire multi-level EU political system. To explore the contribution of societal group involvement from this complex approach, scholars resort to normative theories, such as neo-pluralism, deliberative democratic theory (Dryzek 1990; Bohman 1996; Habermas 1996; Dryzek 2000; Kohler-Koch and Finke 2007, 214) or associative democracy (Saurugger 2008; Hirst 1994).
have internal democracy structures and member participation to be representative. The population perspective evaluates representativeness on the basis of participatory democracy norms, and the individual perspective evaluates group representativeness based on representative democracy, or rather political party, norms of representation.

The empirical assumptions behind the narrow professionalisation conception

Today’s professionalisation literature on advocacy groups argues the same incompatibility between professionalisation and representativeness that corporatist and political party literature did, grounded in the traditional conception of representativeness. They detect the same tensions, where recognition is assumed to lead to bureaucratisation, co-optation and remoteness from members. Both strands of literature base their understandings of democratic input on group representativeness through the logic of membership derived from representative democracy theory that is organisational representation through elections and voting. Effects of professionalisation, or bureaucratisation, on representativeness are hence judged analysing principal-agent relationships and participation. Trade unions and political parties were considered to be undemocratic, because their bureaucratisation was thought to hamper their linkage function. In the same way traditionalists criticise what is happening to advocacy groups as they are becoming institutionally recognised.

The broader interest group literature, including political parties, use both of the terms bureaucratisation and professionalisation, which are, however, not clearly defined and are often treated as equivalent. ‘Bureaucratisation’ is characterised by standardised procedures, formal division of responsibility, hierarchy, and impersonal social relationships (Weber 1922). The term was particularly prominent in the trade union and political party scholarship at the beginning and late twentieth century (Michels 1911; Offe 1984; Pizzorno 1981; Sabel 1981), concerned with co-
optation and changes in internal organisational structures that affect internal democracy and bottom-up representation as a result of recognition. Professionalisation has become the dominant term in more recent party and interest group scholarship and is used similarly. It refers to changes in organisational and structural changes towards established and efficient organisations, such as the increasing use of expertise and efficient coordination structures. It describes changes in organisational values and expertise, such as the employment of professional staff with private sector experience as opposed to volunteers with non-profit backgrounds and the moderation of original policy goals.

Robert Michels developed one of the first major critical theories in context of the professionalisation or rather bureaucratisation of groups, called the ‘iron law of oligarchy’, which he developed based on a detailed empirical study of the German Social Democratic Party. Any group requires leadership and coordination, which is necessarily realised by bureaucratisation and specialisation. However, any leadership organising itself will develop its own interest, thus leading to a rise in power and corruption amongst leadership groups.\(^{31}\) The consequence is that any organisation, regardless how democratic it may be to begin with, will develop into an oligarchy, an internal power elite (Michels 1911). The interests of a professionalised party oligarchy will become more and more distanced from those of the voters, developing their personal interests in maintaining their position of power (Michels 1911).

By the 1950s and 1960s the view that oligarchy is endemic in any kind of organisation was contested.\(^{32}\) Interest group representation as such was not much of an issue during times of economic growth and low levels of

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\(^{31}\) Poguntke also detects a rearrangement of inner party power balances to the benefit of the party’s public office (Poguntke 2003, 8).

\(^{32}\) Michels iron law led to various studies on inter party decision-making processes and although Michels is seen as raising valid attention to the dependencies between political functions and organisational conditions, his empirical grounds and conclusions are disputed (Poguntke 2003). Several authors understand parties as internally fragmented leading to a multiplication of power centres, a phenomenon for which empirical evidence has moreover been collected for parties at EU level (Katz et al. 1992; Widfeldt 1995; Poguntke, 2000; Scarrow 2000; Mair and Biezen 2001).
social tension; but during the economic, social and political shocks of the late 1960s attention moved to the role of interest groups in the democratic state. Still, in American political science, representation was not the focus of interest group studies; rather it was the role of groups as intermediators between society and state and their contribution to economic growth and stagnation or political stability and instability. Also, the prevailing opinion that the formation of interests is determined by socio-economic structures (Committee on Comparative Politics, see Berger 1981, 6) or advanced by individuals with private aims (Olson 1965) gave no reasons to raise the question of representation. Olson instead focussed very much on collective action itself and the problem of representativeness was left untouched. He claimed that some interests could in fact not be organised. Researching trade unions, he put forward the argument that groups of individuals with common interests do not necessarily tend to further their common interests as generally presupposed by American political scientists at the time.\(^{33}\) As soon as groups of a certain size start sharing their costs of efforts and grow, this results in a tendency towards exploitation of the great by the small.  

Social theory in the 1950s and 1960s did on the other hand investigate the relationships of power within groups and more precisely whether groups were representing the interests of members or their bureaucratic leaders, contesting the applicability of Michels iron law of oligarchy (Eldersveld 1958, 185; Lipset, Trow, and Coleman 1956). Lipset provided some empirical basis for the argument that a competition between leaders gave members some control over outcome (Lipset, Trow, and Coleman 1956). But other than quantitative surveys between organised and unorganised interests of the population (Almond 1958, 271), the issue of representation was not taken any further (see Berger 1981 for a short overview).

\(^{33}\) Olson’s argument as he states it is however not valid for small groups, who “...[i]n many cases [...] are more efficient and viable than large ones” (Olson 1965).
In the 1970s and 1980s a new strand of literature raised doubts about the mostly optimistic view of scholars of interest group representation. Organisational forms were now seen as part of the process of the definition of interest and no longer just as given by socio-economic structures and national specifics. The questions of why particular groups emerge, what they do and what impact they have, moved to the centre of attention and with that the problematic of representation re-emerged. Institutional recognition was considered not only to be shaping forms and strategies, but also content and definition of interests. Co-optation - diverting preferences and mellowing of conflicting interests through an assimilation of interest groups into institutional governance cultures and power structures - was back on the agenda. The debate evolved around different systems of interest group regulation, mainly corporatism and pluralism, and their effect on group representation. The definition of the ‘linkage’ (Lawson 1980) between political institutions and society (Sartori 1976)\(^{34}\), was found amongst other factors to depend on organisational characteristics, such as the internal condition of a political party.\(^{35}\) This linkage was defined in other words as the political function of parties and the representative and intermediary roles that managers of selected, centralised business interest groups and trade unions play (Lijphart 1968) between international bureaucrats and voters (Streeck and Schmitter 1991). Several party political and corporatist studies turned empirical concerns toward changes in internal organisational structures and toward a development of organisational elites aggravating the linkage function as a result of recognition. The political party literature maintains that recognition, in the sense that a party becomes a parliamentary party, leads to professionalisation which affects internal party structures and lines of

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\(^{34}\) Political parties, or ‘party pluralism’, translate “mass preferences into public policy” (Key 1961, 433) and channel public preferences (Sartori 1976, 25) by organizing “the chaotic public will” (Neumann 1956, 397).

\(^{35}\) Good overviews on comparative research on party organisation for example are provided by Poguntke and Poole (Poguntke 2003; Poole 1981).
accountability creating a top-down party promoting pragmatism over ideology (Evans and Sanderson-Nash 2011, 470f). Similarly, Ofe argued that by providing power and public funds the state could impose a status on some groups in corporatist structures; thus a small number of selected interest groups would end up with a representation monopoly. This institutionalisation of interest groups’ authority would then lead to internal transformations of the system of representation where some groups act for their members (‘class organisations’) and others for influence (‘policy-takers’). Neo-corporatist groups were hence criticised for acting in self-interest and not in the interest of the members or the public as well as for privileging strategic interests (Offe 1984). Pizzorno described a cyclical emergence of interests that would aggregate, bureaucratise, co-opt and eventually dissolve after members and leader interests split. The institutionalisation and bureaucratisation led to the loss of check and control mechanisms of members over leaders and would only ever be there during moments of reformation (Pizzorno 1981; Sabel 1981). Schmitter came to the same conclusion that groups or rather their leaderships no longer represent their members as a result of institutionalisation, though he argued this was because of the stability of groups and not part of a cycle (Schmitter 1981).

One aspect of professionalisation raised in the political party literature is the development into ‘electoral-professional parties’ (Panebianco 1988) with a decreasing social anchorage (Katz 1990; Katz, Mair et al. 1992; Mair and Biezen 2001; Poguntke 2002). Trends towards efficient management of the economic and social system were related to a development of “catch-all” parties in the US around 1945 to 1960s (Margetts 2001, 9), determined to win over as many voters as possible with a very general political programme, displacing parties bound to clearly defined public interests. This is similar to advocacy group critics detecting an increasing coverage of broader issues and a search for organisational structures and strategies, such as campaigning, attracting mass support
rather than member input (Jordan and Maloney 1997). Parties thus became suppliers of hardly varying political programmes (Kirchheimer 1965). The internal logic of parties became increasingly influenced by their function as electoral campaigners (Farrell and Webb 2000; Bowler and Farrell 1992). Being a politician became a career rather than an ideological conviction (Beyme 1993), something equally observed in the advocacy group world (Frantz 2005). The simultaneous stronger reliance on governmental alimentation also shifted the focus of parties on mass communication rather than representation of specific interests, because of their using more and more capital intensive and technologically demanding electoral campaign methods. A development towards mass-reaching campaign groups has also been connected to the large amount of funding EU umbrella advocacy groups receive.

This strategic dilemma between influence and member inclusion, as well as ideological and interest moderation as a result of professionalisation is exemplified in the literature by using the German green party “Bündnis 90/die Grünen” (in short “die Grünen”). Green parties are an interesting comparison with environmental activist groups, due to their resemblance in original ‘movement-party’ structures, in self-understanding as ‘extra-parliamentary opposition’ and in ideological focus on ‘new issues’ and opposition to ‘distant decision-making institutions’ (Bomberg 1998, 26,28; Bomberg 2002, 30,33). Elizabeth Bomberg explains how in order to try to take advantage of working through the EU, die Grünen had to take measures that violated their own grassroots beliefs. Acting as a movement-party required “a loose, flexible form of political organisation” (Bomberg 1998, 28). But at the same time, rules set up by the German greens aiming to avert organisational rigidity were hindering their effective exploitation of their social capital. The rotation practice for instance stopped experienced

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36 In party politics debates, the financial aspect is also found to have precise repercussions on the organisational condition and inner organisational decision-making processes of parties, in particular affecting their linkage function (Poguntke 2003, 11).
and knowledgeable officers from continuing to serve the green party in office. Additional conflicts, already apparent at national green party levels, were exacerbated at European level due to the great variety of green parties cooperating in the European green party network. The inclusion of party ministers and senior party officials in EU committees moreover made the EU such an important subject that it could not be left to ad hoc groups which then resulted in a further “widening of the gulf between Green party members (whose knowledge of or interest in EU matters remains slight) and party MPs, MEPs and senior party officials who must increasingly deal with these issues” (Bomberg 2002, 38). Bomberg argues that strategic debates ended up overshadowing the green parties’ more fundamental questions. Europeanisation accelerated “the mellowing of Green ideology and ‘professionalisation’ of Green party politics” (Bomberg 2002, 29). The green parties’ agenda became increasingly focussed on EU issues in order to enhance their electoral support and their emphasis shifted towards ‘safer’ issues that few would oppose, thus privileging certain ‘pragmatic’ green issues over more radical grassroots ones. The leadership became more centralised and consolidated; the party itself became a more professionalised streamline party in response to the rules of EU policy-making processes as well as demands for internal reform. The gap between leadership and rank and file further widened – shifting the core decision making power from the grassroots to the central leadership (Bomberg 2002, 29-46). The participation in European decision making thus had strong organisational, strategic and ideological effects on Green parties. These are similar concerns of professionalisation to what traditional advocacy group scholars raise today and remind of Michels iron law (Michels 1911).

The wider interest group literature provides some analysis of the professionalisation of groups and the impact on group representativeness. Trade union and political party studies provide some useful food for thought regarding to the dangers of professionalisation for
representativeness at the individual group level. However, those authors apply a very narrow understanding of representativeness as well as professionalisation. Representativeness is defined through the formal participation in organisational decision-making and their conception of professionalisation neglects any modern technology developments. The civil society organisation and advocacy group literature on the other hand looks mostly at the population perspective of representativeness and also ignores recent technological developments and their implications for internal representative structures. This research looks at the individual organisational level of EU advocacy groups. It considers internal organisational changes due to recognition or rather professionalisation and the effects on individual group representativeness.

Scholars who have studied traditional advocacy groups and those concerned with trade union and political parties make similar arguments about recognition leading to professionalisation and bureaucratisation affecting representativeness. There are three problems here. Firstly, political parties and trade unions do not function in the same way as groups advocating in the general interest and secondly, the theoretical and conceptual approach misses the point of how advocacy group representativeness should be defined. The linkage function, based on which scholars judge the representativeness of groups, is considered to be affected by internal organisational structures. Political party and trade union decision-making is formalised by voting systems in which members participate. However advocacy group members and supporters often have different representation demands and groups hence have developed varying decision-making structures. An example is network-structured advocacy groups, in particular supporter groups, with demands to represent a common cause through alternative ways of forming positions. Third, conclusions drawn on what effect professionalisation has on advocacy group representativeness are taken using the same traditional principal-agent criteria that are applied for trade unions and political
parties. This traditional conception of representativeness does not do justice to the complex dynamics of group representativeness but is still linked to traditional representative democracy. It is not appropriate in the cases of cause groups, who resemble an important number of (EU) advocacy groups.

**Professionalisation and representativeness in the broader democratic theory discourse**

Though the strategy to bring the people closer to the EU is aimed at improving the democratic credentials of the Commission’s decision-making, the wider democratic theory discourse has little to offer with regards to this study’s research question. Interestingly, the main strands of the normative EU democracy scholarship give only peripheral attention to civil society or indeed advocacy group professionalisation. Coming from a parliamentary democracy perspective, they look at technocratic governance, the weaknesses of the European Parliament, and the prevalence of national ministries interests in the European Council with a lack of democratic backing in the member states. Though there is a lot of literature on participatory democracy, the strategy of enhancing democratic credentials through advocacy group participation in European political decision-making is ignored by the main strands of the wider EU democracy debate. The literature looks at the parliamentary road as the only road out of the democratic deficiency problem.

The particularity of the EU in the democracy debate is the introduction of another political level, which has confused familiar relationships and balances of political legitimacy.\(^{37}\) The application of national democratic legitimacy concepts to transnational levels has turned out to be complex and moreover one that is contested. As a result,

\(^{37}\text{A detailed overview on the conceptions of democracy at EU level can be found in Kohler-Koch. and Rittberger (2007). An overview on the conceptions towards the role of civil society in EU governance is given by Kohler-Koch (2010).}\)
discussions tackling the (desired) political identity and (deficit) function of the EU as well as related legal regulatory requirements for the evolving patterns of cooperation have risen to the forefront of the academic as well as political debate.\textsuperscript{38} Arguments have taken on-board different perspectives on the dimensions of modern political democracies: decision-making, representation and citizenship.

The heart of the debate about the legitimacy of the EU evolved around the criteria of autonomy versus effectiveness (Scharpf 1996; Midgaard 1997; Schmidt 1997)\textsuperscript{39}, and is essentially about the search for the right balance between democracy (autonomy) and efficiency. Some scholars do not even see a democratic deficiency in the EU or the Commission. A normative argument made by the ‘technocrats’ is that there is not actually any democracy problem because efficient outcomes legitimise EU policies (Majone 1999; Moravcsik 2002). Two of the most prominent adherents, Majone and Moravcsik, believe that the EU is in fact as democratic and accountable as international governance will probably get. Most scholars supporting the latter position take an inter-governmentalist approach or allocate democratic control over decision making for the most part to nation states and their governments. For them indirect input legitimation through national states, and more precisely national parliaments, together with EU output legitimacy through effective policy outcomes is sufficient to legitimize EU politics (Majone 1998; Moravcsik 2002). This specific debate around elitism and technocratic governance touches on professionalisation, but the discussion is about the professionalisation of politics and outsourcing of regulatory services to independent agencies, sometimes called ‘quasi-non-governmental-

\textsuperscript{38} Also referred to as ‘democracy and legitimacy beyond the nation state’ (Dahl 1999; Featherstone 1994; Follesdal and Hix 2006; Moravcsik 2004; Scharpf 1999; Zweifel 2006).
\textsuperscript{39} In the democratic legitimacy debate Scharpf assesses the conflict between ‘autonomy’ and ‘effectiveness’ as dimensions of the normative criterion of “democratic self-determination” (1996, 136). These he believes can have a negative empirical connection, meaning that in certain cases, one needs to be traded-off for the other – but both are necessary to achieve a democratic system.
organisations’, rather than the professionalisation of advocacy groups and the impact on their role in interest group representation.\textsuperscript{40}

The other core argumentation on democratic legitimacy in the EU arose around the relation of political authority and political loyalty and is essentially about defining channels of public support for political decisions giving citizens the right to self-regulation and political equality. Many scholars believe that there is a deficit of public control with political equality, which requires improvements of input legitimacy at EU level (Arnull and Wincott 2002; Hix 1999; Zweifel 2006). The underlying suggestion in most studies is that citizens will only accept the EU as legitimate if its institutions provide participation opportunities for citizens to shape EU decision-making just as they expect it on a national level (Sudbery 2003, 95).\textsuperscript{41} On a national level, the citizens of a state provide the national government bodies with authority to exercise direct legislative and redistributive powers that affect the citizens within the state. But the idea that it is not only the citizens of one nation deciding over one nation’s fate challenges our traditional view. Instead some ‘far away’ EU regulatory body exercises direct legislative and redistributive powers that affect citizens and their governments, authorised by citizens of other nations. The result is a gap between the demands for a political authority at the EU level on the one hand and the (missing) ‘popular loyalty’ that is required to support

\begin{itemize}
  \item The empirical debate revolves around a Brussels elite circle dominated by business experts, who are not democratically accountable, but take decisions and decide on regulations without due hearings, transparency and publicity (Middlemans 1995, 612 cited in Eriksen and Fossum 2002, 404). This technocratic governance is considered to be unable to aggregate particularistic interests (Steffek and Nanz 2008, 6). Expert deliberation is recognised to lack a strong link for communication between the European constituency on the one hand and the EU institutions on the other (Steffek and Nanz 2008, 6).
  \item Hence in theory, IGOs are often looked at as some sort of “international state [...with a...] global polity and a global population” (Zweifel, 2006, 13) in order to permit the application of the concept of democracy to IGOs. As an analytical framework to find out whether IGOs are democratic and represent the global citizens, Zweifel discusses seven input ‘dimensions of transnational democracy’. These are 1) ‘appointment and removal of power’, 2) participation, 3) transparency, 4) reason-giving, 5) overrule, 6) monitoring, 7) independence and, together with one output dimension ‘effectiveness and performance’ Zweifel (2006). However, most scholars argue that large multi-level and multinational IGOs are most unlikely to ever resemble governance structures like a democratic nation-state, and in any case it is probably undesirable that they ever would (Stein 2001). An exception is the EU, where we find positive as well as negative evaluations of its democratic quality and legitimacy. Zweifel for example asserts that the EU “comes close to the world’s most democratic federal polities” such as Switzerland and the US (Zweifel 2002, 812ff; Zweifel 2006, 13).
\end{itemize}
such a transnational authority on the other. The theoretical basis for the argument above is parliamentary democracy in which national parliaments and the European Parliament are the only channels considered for public support. The EU democratic deficit arguments hence revolve around deficits in the political authority of the European Parliament. They do not however consider the alternative channel of public support for political decisions via advocacy groups.

These main normative strands thus come to their conclusions by applying representative democracy theory. The participatory role of civil society or organised civil society is hardly mentioned at all. Some scholars assume the absence of a civil society representation dialogue is because representative and participatory democracy have traditionally been considered a dichotomy (Trenz 2008, 54; Kohler-Koch 2007).

A further group of normative scholars critiques the distance between EU institutions and ordinary EU citizens. Direct access to EU institutions is criticised as not fully defined (Schmitter 2000, 3) and hence citizens feel they have little influence on and possibilities for involvement in the

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42 Hix for example points out that European executive actors such as the Council and the Commission make the bulk of EU decisions whilst the national parliaments’ control is reduced as governments can ignore them or can be out-voted in the Council’s Qualified Majority Voting procedure (Hix, 2005, 177). The intense debate in the 1980s around the weakness of the European Parliament resulted in several changes of legal procedures, including a bicameral legislature of the Parliament alongside the Council of Ministers established in the Lisbon Treaty which entered into force in 2009. Furthermore, there is the second-order election criticism which refers to a “second ranking importance” of the European Parliament elections in comparison to first-order elections that are considered important by politicians, media and public. The ranking is estimated, amongst other aspects, through voter turnouts. Participation in European Parliament elections is low, far lower than compared to national general elections, which can be interpreted as indicating the low reputation of the parliament’s power, a low awareness of its role amongst civil society, and/or simply the absence of public interest in European politics. Participation has in fact been continuously decreasing, despite several reforms increasing the power of the Parliament. The declining participation and interest is reflected furthermore in the failure to push for the establishment of truly pan-European political parties. Reif and Schmitt criticise European Parliament elections as being determined predominantly by domestic cleavages instead of by EU-originating alternatives and thus “the directly elected European Parliament does not precisely reflect the “real” balance of political forces in the European Community” (1980, 3; Bache and George 2006, 20). The formation of national preferences therefore does not resemble preferences citizens would put forward at the European level (Hix, 2005, 206). Meanwhile, Hix concludes that citizens have no opportunity to choose any rival policies on EU issues nor can they “throw out” those who exercise political power at the EU level” (Hix 2005, 206; Follesdal and Hix 2006). Hix argues political competition plays an essential role in the formation of citizens’ preferences because competitive elections foster a political debate at EU level, which gives citizens the opportunity to form their own opinion, based on which they can vote and thus provide legitimacy for a government’s policy-making (2005, 179f).
‘remote’ EU institutions (Bogdanor and Woodcock 1991, 492). Failing to take this public opinion into account is considered to carry the danger of “popular alienation and hostility” (ibid) towards the EU.\footnote{Lack of influence and lack of involvement of many citizens is apparent i.e. through the declining EP election participation (see below). Decreasing participation in EP elections moreover makes precise commitments for the EU difficult.} The resulting challenge is seen in “[bridging] the gap between elite proposals and popular perceptions” (Bogdanor and Woodcock, 1991, 492).\footnote{Amongst the problem-solving suggestions is supplementing representative democracy with direct democracy measures which according to Scharpf generate more legitimacy (1996, 137). One suggestion is “the direct election of an executive” (Bogdanor and Woodcock 1991, 489) or rather “a (partial) presidential/interlocking system” (Hix 1998, 19) where the Commission president is indirectly elected by national parliaments (Hix 2002). This way a “genuine system of competitive party democracy” (Hix, 2005, 176; q.v. Hix 1998, 19) may develop that may eventually form a European identity. However Hix also mentions behavioural changes required to make this system work (Hix 2005, 176f). A further suggestion brought forward to “bridge the gap” is the use of referendums for certain EU issues (Bogdanor and Woodcock 1991, 489).} It is amongst these scholars where participatory democracy finds mention (Warren 2001; Collingwood 2006; Maloney 2006; Greenwood 2007; Kohler-Koch 2010). The theoretical background for organised civil society participation is interest group pluralism, which provides enhanced participation opportunities by recognising diverse interests in the form of interest groups whose opinions are taken into account in the decision-making processes alongside the traditional mechanism of parliamentary or assembly votes (Czempiel and Rosenau 1992; Schulze 1994).\footnote{This strategy is moreover closely connected to political integration and the creation of a single political space, making the international level the realm of political participation as opposed to the national level (Kohler-Koch 2008a, 21).} The argument is that a stimulation of political and civic engagement can balance out assumed deficiencies in representative modern democracies (Maloney 2006, 99) and will enhance the democratic quality of policy making. The Commission’s mandate requires it to consult the diverse voices of the European citizens and hence forms the basis of its legitimacy.\footnote{The European Commission in its White Paper on Governance expresses its wish for itself and the EU as a whole to be a legitimate, democratic player that is respected and understood by the citizen. To achieve this, it strongly emphasises the need to improve effectiveness of all governance processes with, within and amongst EU institutions on multiple levels. The Commission explains that even though the EU is neither like a national government nor can it deliver policy making in the same way as national governments (European Commission 2001, 32), people still expect the EU to do politics similarly to their national political institutions. Quoting the Commission, the EU has to meet citizens’ expectations, though in different ways: It has to build partnerships with a wide variety of actors (2001, 32).} This is where the strategy of...
the European Commission to enhance its democratic credentials via the engagement with advocacy groups has its roots. In this context, the Commission wants to strengthen the role of groups as facilitators of a broad policy dialogue giving a voice to civil society’s views as an alternative form of participation next to representation (e.g. Greenwood 2007, 177; Maloney 2008, 70; Czempiel 1993, Kissling and Steffek 2008, 209f). The legitimacy of this form of representation “is closely linked to the fundamental right of citizens to form associations in order to pursue a common purpose” (European Commission 2002, 5).

Nevertheless, the strand of the normative literature promoting enhanced participatory channels does not touch interest group professionalisation and at the same time, the literature that engages in professionalisation of groups is relatively disconnected with the EU democratic legitimacy debate. As the normative democratic deficit model does not engage with the questions on how group professionalisation affects their representativeness and what group representativeness means, it is not directly relevant to this thesis.

The larger EU democratic deficit and legitimacy literature investigates systemic structures, such as the inclusion of citizens either directly through the parliament or indirectly through nation states. Recent legitimacy literature suggests a third channel of citizen engagement via the Commission. However suggestions in this strand of the literature are of systemic nature, disregard the micro-level of such engagement dynamics and are not based on empirical observations. This is crucial, because they cannot be compared with parliamentarian structures. The dynamic of the inclusion of the citizens – or rather civil society - via the Commission works differently to the representative structures discussed in the grand democratic deficit literature since we are confronted with an

\footnote{Civil society [organisations] play “an important role in giving voice to the concerns of the citizens and delivering services that meet people’s needs” (European Commission 2001).}
administration. Concerning the “bridging the gap strategy”, the Commission actually engages with EU level confederations of solidarity groups and their interests, rather than with the individual citizen and their vote. Civil society and interest group literature on the other hand has indeed touched on groups acting as mediators between the Commission and the citizen, as well as on the democratic credentials this strategy might improve. But again it largely neglects the effects of recognition on the internal dynamics of groups. Few authors have investigated internal dynamics of confederated groups and a recently discussed problematic is the professionalisation of groups as a result of recognition which is assumed to be hampering their ability to act as mediators. However detailed studies are missing. Studies either raise problems based on normative assumptions that lack empirical underpinning, or empirical studies are based on normative assumptions derived from theories that are grounded in representative democratic theory. This study fills this gap by undertaking a systematic empirical analysis of the internal dynamics of groups, in order to investigate whether the engagement between the Commission and advocacy groups is a zero-sum relationship in terms of its democratic credentials. It thereby connects the grand but macro-level EU democratic deficit literature with the empirical observations of the civil society literature. The study suggests that though problems do at times arise through recognition, it is an empirical question whether the relation is zero-sum or not, rather than a feature that can be defined by definitional fiat.

In the broader context of groups’ potential to enhance democratic EU decision-making, it is important to point to the fact that, though a large body of literature takes into account pluralist understandings of how groups can enhance the democratic quality of decision making, professionalisation criticism of advocacy or lobbying groups seems to be disconnected from the wider pluralist debate. The underlying perception of participation and group democratising qualities in most studies is restricted to access and representation in formal participation mechanisms (Kohler-Koch and Finke
taking into account the contribution of civil society to the democratic
quality of the entire multi-level EU-system (outside the institutional
system), is largely neglected by group professionalisation critics.

Conclusion

As the argument above makes clear, the Commission’s strategy to
enhance the quality of its decision-making is not doomed. The assumption
in the traditional interest group literature that groups professionalise as a
result of formal recognition and thus lose their representativeness (Kohler-
Koch 2010, 111; Kohler-Koch 2008; Sudbery 2003; Warleigh 2001) is based
on a too narrow conception of representativeness and an out-dated
empirical conception of professionalisation. The conclusion reached by the
traditional literature is limited only to a range of cases. It does not apply to
all types. Organisational structures and strategies of representation differ
between advocacy groups, not only as opposed to trade unions and
political parties, but also amongst advocacy groups themselves. These
differences require a reconsideration of membership-logic as a basis for
representativeness. Moreover, updating the concept of professionalisation
beyond bureaucratisation, to include the increasing application of new
media technology, calls for a fresh look at the effects of professionalisation
on organisational structures and strategies of group representation.
3 The diversity of group representativeness and professionalisation

There are theoretical, conceptual and empirical problems with the traditional approach to the assumed dichotomy of professionalisation and representativeness. The aim of this thesis is to open up the representativeness-professionalisation dichotomy and in this context the narrow view on advocacy groups and their representation potential. The existing literature on interest groups applies traditional conceptions of representativeness that are accommodating neither the diversity of organisational structures and strategies of advocacy groups, nor recent technological advancements impacting organisational structures and strategies. Instead professionalisation is confined to organisational bureaucratisation such as expert staff and streamlined structures as well as co-optation. This thesis connects wider perceptions of representativeness in interest group studies with findings in communication and media studies on organisational implications of technological advancements such as the internet and social media. Professionalisation in new media technology can have precise implications for structures of communication and participation. It points out the discrepancy and lack of communication between the different scholarly approaches. Broadening both conceptions may lead to different conclusions on the implications of professionalisation for group representativeness. The findings for bureaucratising political parties and trade unions may not hold true for professional advocacy groups. This chapter elaborates the theoretical and empirical basis for such a revision.
Traditional literature on group representativeness has not considered organisational differences between advocacy groups and other interest groups beyond remarks about the difficulty of organising diffuse interests and hence their disadvantaged starting position in gaining access and having an impact at EU level. But the relevance of analysing and taking into account organisational differences is much more important than that. It determines, as will be discussed in this chapter, what type of representative claim a group puts forward and how it does so, as well as what type of members/supporters a group has. That in turn impacts how a group’s representativeness can be judged – and how the impact of professionalisation on a group may be judged.

This thesis argues for a much more nuanced response to the question, whether groups can be representative. The first section of this chapter shows the limitations of the traditional conception of representation as a result of its origins in representative democracy, or democratic representation in political parties. It suggests alternative approaches to understanding group representativeness, taking into account the diversity of organisational structures and strategies and suggesting a two-dimensional character of representativeness. The second section highlights the roots and shortcomings of the narrow traditional conception of professionalisation, or rather bureaucratisation. Bureaucratisation carries different implications for the diverse organisational structures and strategies of representation. Moreover, the thesis analyses the implications of new media technology for representativeness. The chapter concludes that progressive conceptions of professionalisation and representativeness lead to different conclusions for the impact of professionalisation on group representativeness. Further empirical studies revising the professionalisation-representativeness dichotomy assumed in the traditional interest group literature are needed. The Commission’s strategy

48 There are studies describing also the diversity within advocacy groups active in the general interest, including the diversity amongst cause groups such as environmental groups (Greenwood 2003, 175-229), but these have not been applied to the representativeness assumption.
to enhance its democratic credentials by engaging with advocacy groups might not be doomed.

**Diverse organisational structures and two-dimensional representativeness**

The traditional conception of group representativeness is based on member participation in internal decision-making. Positions are formed based on member input and representation is thus taking place to further members’ interests (cf ‘promissory’ and ‘anticipatory’ representation by Mansbridge 2003). Recent studies on political parties and advocacy groups have, however, found that representation is more diverse and depends on the organisational structures and strategies of groups, including their type of constituency and beneficiaries (Halpin 2006; Mansbridge 2003; O’Neill 2001). The following section connects recent insights in the political party and interest group literature and attempts to redefine the concept of advocacy group representation. The thesis moreover suggests that representativeness is two-dimensional, requiring not only an acceptable structure of position formation, but also the acceptance of the ‘representative claim’ (Saward 2006) by group members and supporters.

**Acceptable formation of positions: The acceptability dimension of representativeness**

Since the traditional theoretical framework is linked to representative democracy or rather democratic representation, traditional interest group scholars approach the judgement of how professionalisation affects group representativeness by analysing impacts on member participation and mobilisation. This conception is linked to the principal-agent form of representation we find in elected representation that constitutes representative democratic theory. In other words, representativeness is judged by groups’ internal democratic structures. Groups are considered
evaluated if members have a say in organisational decision-making and decide on the positions and activities of a group.

Evaluating the representativeness of advocacy groups using the membership-logic as yardstick is problematic. Before one can measure representativeness, it is crucial to open up the dynamics of representation and ascertain who or what groups actually represent and how they do it. Do members elect their leadership to represent their interests one-on-one, or does the leadership represent interests that members support? Is representativeness necessarily based on membership participation, or can members and supporters be represented through alternative modes? In the case of public interest groups, who benefits from the interests represented, the members and supporters specifically, the wider society, or the future society and those with no voice? The argument here is that the diverse dynamics of representativeness require a more nuanced assessment of what makes a group representative and ultimately what criteria need to be applied to evaluate their democratising potential. It points to the need to open up and adapt the logic of representation to the dynamics and dimensions of advocacy groups in a multilevel network environment. The general issues of representativeness are moreover complicated by the development of multi-level governance. This complexity is a particular feature of policy-making in the EU. Analysing the effects of professionalisation on representativeness, it engages with the concept of representation in context of advocacy groups, a field largely neglected (however see recent work by Halpin 2006; O’Neill 2001), as well as with literature on the representation of interest groups and political parties more broadly (Burke 1782; Mansbridge 2003; Saward 2006).

Representation in advocacy groups is different to representation in the electoral system. However judgements of representativeness and the impact of professionalisation on the latter have so far mainly been based on theories of representativeness originating in traditional representative democracy theories. These theories are not comprehensive enough and
indeed inappropriate for explaining the dynamics and characteristics of
group representation. The traditional conception of representation is
derived from representative democracy theories, where representativeness
is solely gained through voting/formal participation structures. Recent
(Halpin 2006; O’Neill 2001; Mansbridge 2003; Saward 2006) and other
literature (Burke 1782) suggests there are different mechanisms of
representation. Firstly, membership-logic does not do justice to cause
groups whose representativeness works according to logic of ‘solidarity’ (cf
O’Neill 2001; Halpin 2006). Also, representativeness does not necessarily
require the construction of a ‘representative claim’ by the members. Group
leadership can equally make a legitimate claim which people then choose
to support as representing their interests (Saward 2006).

Further, given the fuzzy definition of the character of groups,
resembled in various labels such as non-governmental organisations, civil
society organisations or social movements, as well as the vast normative
democratising expectations raised by sociologists, democracy scholars and
international relations scholars (for a short overview see Halpin 2010, 1-
24), it appears rather impossible to respond with a flat yes or no to the
question of groups’ representativeness and democratic potentials (Halpin
2010, 23f). Groups are indeed very different in the roles they assume, the
organisational structures and strategies they take on board and the
(mutual) relationship they develop between leadership and affiliates (cf
Greenwood 2003, 175-229). One empirical shortcoming is that traditional
group scholars derive their conclusion that professionalisation and
representativeness are incompatible mostly through studies with very
broad or loose definitions of advocacy groups (Warleigh 2001; see Kohler-
Koch and Quittkat 2009 on the broad use of the concept of civil society
organisations). Only very few studies look solely at groups that have a clear
general interest purpose as opposed to furthering members business or
professional interests, even if not-for-profit. Not many theoretical and
empirical studies differentiate organisational structures and strategies also
amongst advocacy groups active in the general interest (cf Halpin 2006, O’Neill 2001). Whether or not a group stands for genuine general interests makes a difference not only with regards to democratic credentials and genuine voice of and for the citizens, but with regards to expectations towards representative structures. It also matter whether a group is representing a narrow cause such as conventional social movements (e.g. abolition of hunting) or are active in the more general interest of the environmental cause for example (e.g. Greenpeace). The response to democratising expectations requires a much more systematic approach in order to understand which types of groups have got what degree of representativeness – and how this is affected by professionalisation.

This thesis defines a group as representative, if the purpose of its representative claim is the same as of its members and supporters and if the representative claim is accepted as representative by its members and supporters. How these same properties come about varies according to organisational structures and strategies of representation. Consensus or votes are required, if the claim or leadership is to be representing members, such as occurs in the case of trade unions. But the same properties of interest do not have to come about through member participation. They can be brought about through a supporter choosing to join a group to support a broad political aim of the group, or a supporter might sign a campaign or get active on a single issue campaign in support of a specific policy goal. Individuals joining groups based on shared political values feel that their interests are voiced by these (cause) groups, hence they feel represented and this dynamic needs to be included in the judgement of representativeness. From a traditional democratic theory perspective, representation through means other than member participation does not mean ‘representation’ and hence from this perspective there is no need to re-label. It is an asset to have more interests represented, but a group with no traditional internal democracy will not be considered representative. The point this thesis makes however
is that a lot of dynamics do mean representation, if not in the traditional context.

Few attempts have been made to define a more comprehensive concept of group representation that will take into account different structures of representation, including member or supporter structures. Curiously, the concept of representation has recently gained renewed attention by political party scholars, questioning the narrow and limited understanding of representation in the literature so far (Mansbridge 2003; Saward 2006a). Similarly, a small number of scholars have started to critically look at the particularities of advocacy group representation, in particular of cause groups (Halpin 2006; O’Neill 2001).

**Member versus cause groups**

The assumption in the literature is that groups form their positions based on democratic member votes or participation in organisational governance. Their positions are induced by the preferences of the members’ interests and the grassroots supporters. In other words, positions are formed to represent members’ preferences. An example would be trade unions, which form positions based on the needs of employees of a specific business sector. Group leaderships form positions in the interest of individual members’ personal workplace needs and the representation is taking place on behalf of these individual employees. Representatives are ‘acting for’ (Pitkin 1969) members and members cause changes in the groups’ representative behaviour (Mansbridge 2003, 521). The organisational strategy is to represent their direct ‘human’ members, since the interests represented are those of the constituency, thus of the members. The human characteristic further includes that the constituency (members) could potentially speak for themselves (Halpin 2006, 926).

Adapting Mansbridge’ conception to the case of EU groups, these might thus put forward a “relatively unmediated version of the constituents will” (promissory representation, Mansbridge 2003, 516). The EU group is
then accountable to its member groups (and they in turn to their members) in the traditional principal-agent sense. EU groups have to keep their promises in order to be representative of their constituency. Or EU groups might put forward a position they predict members will agree to in hindsight (anticipatory representation, Mansbridge 2003, 517). This creates a reciprocal power relation and enables continuing mutual influence, because it leaves room for members to change their preferences and for EU groups to influence members’ preferences (2003, 517f). The difference to promissory representation is that EU groups put forward positions because they think it makes sense taking into account member characteristics (prudential), not because the EU group “ought to” based on promises made (moral) (2003, 519). The basis for judgement of EU group representativeness in anticipatory representation is the quality of communication between members and the EU group in order to anticipate preferences and influence them (2003, 519). EU groups need to create conditions of choice leading members to make choices in their interest. Influence exerted by the EU group has to be educative in the interest of the original environmental mission (cf 2003, 517, 519). The quality of education can be judged by deliberative criteria, assessing whether members are more or less aware of their underlying interests and policy implications and whether they are able to transform their preferences in a way they will later consider as ‘good’ (2003, 519). ‘Good’ in the context of environmental groups includes members becoming more concerned with the health of the environment and the common interest.

In short, the literature expects EU environmental groups to form their positions based on member participation in organisational governance, facilitating representation on behalf of the members. This implies that member groups participate in EU position formation and that they internally provide for participatory structures down to the grassroots. Judging representativeness is based on either the numbers of members and
supporters (promissory) or the deliberative qualities of the communication between EU groups, member groups and grassroots.

There is an inherent problem in conceptualising all groups with the ‘representation through membership-logic’. The definition of a member in the traditional context is a person or organisation formally affiliated to a group, generally through the payment of a membership fee (depending on the organisational structure), with the right to participate in opinion formation and organisational decision-making. The traditional concept thus defines a group as representative if its positions are formed and decided upon by formal member participation inclusive of all organisational levels down to the individual. However, most groups have no potential to be representative by membership-logic (Halpin 2006, 922); because their work is not in direct benefit of their members but of a cause, and often groups do not actually claim to represent members. Cause, supporter or solidarity groups are groups who stand up for issues such as nature or human rights as opposed to for the benefit of their supporters. Hence the existing normative definition declares the large number of advocacy groups that speak for a cause in the general interest (i.e. non-human constituencies or future generations) or in the interest of those without a voice (i.e. the sick or poor) as non-representative and consequently as having no democratising potential.

These interests, however, are part of our society and hence have a legitimate reason for representation in the political process. They form part of the pluralist interests required for healthy democratic policy-making. Regulating interest groups based on their ability to include membership in formal participation structures (Greenwood and Halpin 2007, 200) is problematic, because it disadvantages groups whose legitimacy is based on their “ability to place a cause in the political arena” as opposed to those groups whose legitimacy is based upon their “ability to represent a given membership constituency” (Greenwood and Halpin 2005). It is indeed exclusive and violating people’s democratic rights to raise their concerns by
joining cause groups, if the voices they give to a group are rendered unrepresentative. For some of the interests, the only chance to be represented is through groups rather than the alternative channel of political parties. The electoral cycle is ill-suited to deal with minority and specialty issues, less emphasised by mainstream governing parties, or pressing issues such as climate change, which require immediate actions benefitting generations beyond the (re) election date.

The more recent advocacy group literature has made some attempts to move away from the traditional understanding of representativeness and argues for a differentiation in expectations towards groups (O’Neill 2001; Halpin 2006; Halpin 2010). Scholars argue that expecting groups to be internally democratic does not take into account the diversity of groups and the consequential differences in the authorisation and accountability relations between group leaders and their affiliates. Conclusions however differ, with some arguing that certain groups such as cause groups cannot be representative though they are legitimate (Halpin 2006, 922) and others arguing that they can, but it is not formal member participation that makes them representative (O’Neill 2001). Some groups cannot be representative in the traditional sense and hence cannot be expected to be internally democratic. Rather than expecting the same democratic structures of representation from all groups, democratising expectations should depend on the type of group constituencies and beneficiaries (Halpin 2006). In other words, evaluation standards and criteria depend on what or who is being represented. In member groups that represent humans, these human members authorize the leadership and hold it to account, as expected by traditional group scholars (O’Neill 2001; Halpin 2006). The source of legitimacy is membership representation via internal democratic structures,

Kohler-Koch for example defines representativeness in a more comprehensive way: “Civil society organisations [CSOs] at the EU level give expression to citizens’ preferences by responding to ‘signals’ (such as public opinion polls, media coverage of public debates) and/or to demands directly addressed to them either by ordinary citizens or by their members (by mandating representatives through elections) or supporters. CSOs, on their part, will channel the (aggregated) preferences into the decision-making process by interacting with the Commission” (2008, 12f).
because the affiliates are also the beneficiaries (Halpin 2006, 925). However in cause groups or so-called ‘solidarity groups’ (Halpin 2006) representing causes rather than the direct interests of human members, such as the environment, animals or future generations, these cannot authorize the leadership or hold it to account (O'Neill 2001:494). “[T]wo central features of legitimisation – authorisation and presence – are absent” (O'Neill 2001, 494). Supporters of cause groups are not the direct beneficiaries of a group. Supporters of animal rights or fight against poverty groups do not benefit from the cause directly. Supporters of environmental cause groups are indirect beneficiaries of a group in the sense that an environmental group represents the interests of the environment on behalf of its supporters. Although a healthy environment is beneficial for all, because clean water and air are collective goods, the primary representation is in the interest of a healthy planet. This affects the requirements for legitimacy and internal democracy. Since the affiliates are not the ones the groups advocate for, they do not need to be consulted in determining positions. The legitimacy of cause groups hence does not result from representing members but from epistemic sources. The emphasis is very much on aspects such as knowledge, expertise, solidarity (experiences) or empathy with the beneficiaries (O'Neill 2001; Halpin 2006, 925ff), as well as judgement (O'Neill 2001). Thus in cause groups that represent political values, the focus is on the internal determination of preferences rather than their formation in response to the constituency. This determination may rely on expertise as in the case of environmental groups. However, any representative claim has to be made on the basis of group values and principles and must be based on acceptance. For other groups, such as human rights groups, this requires further qualitative research.

Recent electoral representation literature similarly criticises the limited understanding of representation. Party political authors have reassessed the specific relationship between authorisation and
accountability, searching for new tools to analyse representation (Mansbridge 2003; Saward 2006; Saward 2009; Severs 2010). Mansbridge argues that existing normative criteria for the judgement of accountability are all designed for one specific type of representation, ‘promissory representation’, which is about a representative keeping or failing to keep promises made to a constituency (cf Mansbridge 2003, 525), but there are other types of representation, recently analysed by empirical scholars, which existing normative criteria cannot judge (Mansbridge 2003, 515). Though Mansbridge argues in the context of electoral representation, lessons can be learnt with regards to the diversity of representation dynamics and related normative criteria for advocacy groups. Mansbridge shows that representation is not as simple and straightforward, but may vary in each context.

Projected to the legitimacy and accountability dynamics of advocacy group representation, Mansbridge’s categories of representation suggest that there is not only membership-logic in the sense of promises being fulfilled. For example, the leadership might support policy positions that it predicts its members and supporters will agree with in hindsight (anticipatory representation). In this case, the emphasis is on the normative need for good quality of deliberation between the leadership and the constituents during the time of policy making (cf Mansbridge 2003, 525). In case of advocacy groups, transparency, deliberation, but also the support of positions and campaigns shown by members and supporters are indicators. Or, the group leadership might base its policy position on its own knowledge and expertise in the field and on the leaderships’ or rather the groups’ principles and common sense (gyroscopic representation). The emphasis here is on the normative need for good quality deliberation at the time of the authorisation of the leadership (cf Mansbridge 2003, 525). In the group world this requires transparency of groups, leader profiles and group principles, which provide the qualitative base for people to decide whether they support a group and its leadership. A groups’ leadership
might also represent the interests beyond its own member- and supporter-ship (surrogate representation). This seems particularly apt in relation to human rights and environmental groups, who lobby for the benefit of the wider society and environment, rather than simply their immediate members and supporters (Strolovitch 2007, 55). Representativeness in this case cannot possibly only be measured via the participation of members. Surrogate representation is a crucial democratic function of groups, because they stand for interests of those that ‘have no voice’, i.e. on behalf of those who lack the necessary knowledge and expertise (Maloney 2009, 284). Mansbridge’s normative criterion here is a proportional representation of conflicting interests as well as “the significant representation of important perspectives” (Mansbridge 2003, 525). Groups are seen to play a vital role in voicing uneasy and by electoral representation neglected minority interests. To resume: in the promissory and anticipatory forms of representation the representatives’ preferences are induced by the constituency. In gyroscopic representation, the representatives’ preferences are internally determined.

As Saward convincingly argues, it is not only the represented, which choose their representatives, but representatives somewhat choose, or rather ‘claim’, what and whom to represent (Saward 2006). A group speaking in the name of the environment will thus base its legitimacy on scientific studies as well as own experience or knowledge in its network. Its supporters may support this cause via campaigns, lobbying or subscriptions; they agree to help the group in its claim and actions to speak for the environment. Indeed, the case of the environment might be an example where it is important that the specifics of the interest are

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50 Mansbridge notes, financial contributions can cause ‘systemic inequities in representation’ (Mansbridge 2003, 525). In group literature, the issue of financial support has been controversial. Some argue groups are over-representing the interests of the rich as well as other dominant parts of society, which works against democratic inclusion (Strolovitch 2007). At the same time, there is a redistributive element to this. Resource-rich citizens ensure interests are represented that less affluent people have strong opinions about, but who cannot afford membership costs (Maloney 2009, 284).
determined through scientific or group research rather than purely through member opinions. A group that advocates the protection of the rainforest, for example, does this based on scientific data and possibly empathy with natives, animals and the planet. Greenpeace actions with regards to the rainforest may be based on their own flights and observations above the Amazon to check where illegal deforestation is taking place to grow soya, and on research into which companies buy this soya which then leads to campaigns against those companies. Members are not included in the collection of facts nor in setting up the campaigns based on these facts, but they support them nevertheless, knowing that they would not have the information in the first place to initiate a campaign. Addressing the democratic deficit through enhancing group representativeness in the sense of membership-logic would exclude such groups, and may thus in fact work against the purpose of political inclusion (Halpin 2006, 937). Thus, even if contestable, O’Neill concludes a ‘representation based on claims’ to speak for non-human constituencies or future generations is “the best we can hope for” (O’Neill 2001, 497).

The question relevant for understanding group’s representativeness is thus not only about representing as such, but crucially also about ‘what motivates people to join’. With promissory groups it is the participation in organisational governance and the positions put forward which members demand. In gyroscopic and surrogate groups supporters are motivated by political values they support. The problem with the traditional concept is that it fails to approach groups with regards to their different political values and member and supporter interests. Different members and supporters request different types of participation structures and degrees of participation, depending on the values and interests they pursue. For example, individuals may join a trade union or the association for university scholars in order to promote their interests and influence the trade unions/associations position. On the other hand, people that join environmental groups like Greenpeace have the environment as an
important value/political aim and to materialise that value they join an organisation that also highly values the environment. Hence some kind of representativeness is still (normatively) needed despite environmental groups representing a cause, but it requires different structures of representation and responsiveness than a member group does, because the traditional authorisation-accountability structure is absent. In other words, this thesis understands ‘cause’ organisations more in terms of a political value people pursue.

There are differing opinions as to whether groups should require people to be actively participating in internal decision-making or not. Some scholars see participation as vital for groups to act as ‘schools of democracy’ (Putnam 2000), whilst others feel that if people do not wish to be active then they should not be forced to (Hibbing and Theiss-Morse 2002). After all, the majority of people choose to limit their participation to a minimum, i.e. to monthly subscriptions or to signing petitions every once in a while, and do not wish to get engaged in group activities. They choose not to be actively involved in groups that have traditional accountability mechanisms in place, or at least not to make active use of their right to authorize and hold leaders to account. They rather rely on leaders to fulfil the objective the group is committed to (qv Jordan and Maloney 1997). Groups with alternative modes of representation hence voice interests of a majority of people and “we should be more concerned if groups were not offering such opportunities” (Maloney 2009, 284). Moreover, absence of formal member participation in governance does not mean that a group and its leadership do not care for their supporter views. Groups where supporters have no say in formal decision-making indeed have an incentive to be responsive to supporters’ views on policies in order to avoid supporter exit (Maloney 2009, 283f). After all, supporters are a vital finance and legitimacy source, translating into political weight.

The Commission’s strategy has to be in harmony with organisational characteristics and the characteristics of civil society, as well as with the EU
decision-making structure. To enhance the democratic quality of its decision-making, it is a necessity that the Commission include these voices of civil society in the way they are voiced. Moreover, whilst it is crucial for democratic quality that active engagement is stimulated at all levels, the work done by elites at EU level may still form some sense of transnational identification, because there is trust and ‘passive engagement’. Quoting Maloney, cause or solidarity groups “activate support by individuals for collective ends” (2009, 284).

To put it bluntly: rendering the voice of a group like Greenpeace in EU decision-making as non-representative, because it has no internal democratic structure, would neglect the interest of all its supporters that have identified themselves with for example Greenpeace’s principles and position. People do have a wide choice of advocacy groups with very different types and degrees of participation and engagement opportunities. A group representation system inclusive not only of member group interests, but also of what is called supporter, solidarity or cause group interests, includes all advocacy group interests and hence is more democratic overall.

In practice, it is not always obvious which type of representation a group pursues: “In practice, representative behavior will often mix several of these forms. One cannot always tell by looking at a specific behavior what dynamics lie behind it” (Mansbridge 2003, 515).

**Accepting positions formed: The acceptance dimension of representativeness**

Judging group representativeness has to consider social legitimacy criteria. The acceptance of groups’ representativeness in the eyes of the constituency, in other words the social validity of a representative claim, is based on expertise and organisational credibility and ultimately on trust of members and supporters in the group. The support of a group via other means than voting/formal participation might have to be accepted as a
form of representation, since anything else would mean the denial of people’s choices to voice their interest by choosing particular groups or campaigns (cf Jordan and Maloney 2007, 33f; Maloney 2009) and would hence be undemocratic. When investigating representativeness, differentiated studies in terms of the demands of groups’ member and supporter base should be a decisive factor for the judgement of representation structures. Traditional scholars look at democratic representation structures, or representing. Hardly any differences in the study on professionalisation and representativeness are made between groups’ member and supporter demands, their political values and interests and their acceptance of what is represented. The differences have implications for what organisational structures of representation and communication are required and how they should be judged.

This thesis claims that part of the answer to the question whether groups can connect the Commission’s decision-making with the base, lies in an aspect of representativeness so far overlooked by interest group and participatory democracy scholars, namely the acceptance dimension. Whilst traditional representativeness takes into account normative legitimacy criteria (acceptability dimension), the acceptance dimension is linked to the social legitimacy point of view (based on the definition of government legitimacy drawing on Kielmansegg 1971, 368 in Dingwerth 2007, 14). The answer to the question whether or not professionalisation undermines group ability to bridge the gap between people and politics, requires the empirical assessment of the ‘social validity’ of a group and its positions: member groups and supporters accepting EU level groups’ decisions as rightful and as representative of their views. The acceptance dimension then is the acceptance of groups’ representativeness in the eyes of the constituency, in other words the social validity of a group’s representative claim.

The acceptance of a group’s representative claim or position varies according to the organisational structures of representation. In promissory
(and anticipatory) representation, where the position is formed based on member participation, the acceptance is expressed at the same time and through the same mechanisms of participation. Thus as a group votes on a position the very vote of the members is also their expression of acceptance. In gyroscopic and surrogate groups this is not the case and the two-dimensional character of representativeness becomes apparent. The position is formed by the group or its leadership on the basis of scientific knowledge, expertise, principles and/or empathy. The acceptance by the supporters of the group is not expressed at the time of position formation. Acceptance in these groups is expressed differently by different members and supporters and at various points in times.

Member groups of gyroscopic/surrogate EU groups express their acceptance of the groups’ activities and positions by being members. They become members because they follow the same principles and mission in support of a cause and generally base their views on the same or similar scientific studies. Member groups also express acceptance by promoting and running campaigns in support of the EU position. Individual supporters (members and supporters of EU member groups in turn) on the other hand express their acceptance through a variety of means which the EU group and its member groups make available. Traditional forms of support are first of all being a supporter itself, by monthly subscription, donations or volunteering, signing paper petitions, writing letters to politicians and engaging in direct action in policy campaigns. Forms of support are further facilitated through new media technology, such as signing online petitions, blogging, and emailing politicians, Facebook, Twitter or Tumblr (see professionalisation section in this chapter).

Thus in a gyroscopic/surrogate group the leadership puts forward a representative claim, such as protecting biodiversity, and people can choose to support this claim as representing their personal values and views. Greenpeace for example puts forward certain transnational political values on environmental issues which supporters identify with. Acceptance
requires a certain level of trust by members and supporters that the leadership represents their interests. A particular issue arising in the debate on surrogate representation is where groups represent people of other communities than themselves, such as the North representing the South. In groups representing voices of the vulnerable, i.e. farmers in the global South or illegal immigrants, there cannot be any explicit trust through subscribing to a group by the effected. The trust is required of those who subscribe to the cause, hence supporters, not from the beneficiaries. This is precisely because these groups do not represent the voices of these people directly, but interests considered – claimed - beneficial to them by the group and by those supporting these values. Hence trust has to exist between the latter towards the common value/cause. More complicated are cases where for example women’s groups in the North explicitly claim to represent women in the South, hence speaking for other constituents without their participation.

There is a need for transparency of the principles and objectives of a group as a precondition for support and trust. Trust is not gained through participation in formal decision-making, but because the mission of a group represents members’ and supporters’ values. Members and supporters need not even be informed about every activity of a group to believe in it representing their interests, as long as they continue to trust in the leadership to represent its values. The specific demands of information and communication depend on member group and supporter expectations. These are in turn related to the principles of information and communication a group communicates when members and supporters join or support a specific policy campaign.

It is argued here that the acceptance dimension, or trust, is based on expertise and organisational credibility. Organisational credibility is reflected in the group’s media image and its popularity in society, as well as in the direct support it receives for example through subscriptions,
donations and campaign support. The fact that supporters and/or members have the option to opt-out but choose to remain ‘in’ indicates a belief by members and supporters in the competence of their leadership to act in their interest. Trust is moreover apparent when member groups support other (EU) groups in their network/hierarchy to put forward a position without having actively participated in the formulation of this position. Trust is derived from a group’s expertise, organisational credibility, responsiveness, transparency and accountability, experience and solidarity. Groups generate trust if priorities and objectives are clear in manifestos and followed in practice.

Expertise can be expressed through the employment of highly qualified staff visible in the educational and professional background of staff, the number of full-time staff and in the general and campaign-specific amount and quality of own or commissioned scientific surveys that inform positions. Additionally, expertise is reflected in the variety and skill of marketing strategies to achieve political impact, which is reflected in the visibility of media and lobbying activities in print, electronic and social media as well as in the communication with affiliates, the public, government and industry. Expertise is consequently also reflected in the availability of resources.

Transparency and accountability (for gyroscopic/surrogate representation this is the adherence to the group’s principles) are very important pillars of trust and are facilitated via open and easy access to information, financial and activity reporting, and the general codes of conduct of a group. The experience of a group in the specific fields where it raises representative claims moreover stimulates trust. Experience is

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Social scientist Christiane Frantz in her work on groups as media actors for example argues that to understand the limits of group professionalisation in terms of a balance between media democracy and credibility of groups as political actors in the eyes of supporters, the response is to be found in the recall of campaigns and the amount of donations as well as certain organisational developments (2007, 194).

Membership retaining numbers, or rather ‘revolving door membership’, may be an issue to be considered here.
reflected in a group’s age, its level and scope of activity, geographically and issue-wise. Local experience of an environmental group might be crucial to gain its supporters trust for one representative claim and for the other it might be EU level experience, thus it is depending on groups principles and strategies. A group showing solidarity/empathy also has the potential to gain trust. Solidarity is meant here in the ideological, principled, moral and ethical sense. For example a group showing and acting upon solidarity with the victims of drinking water pollution or oil spills might gain trust because of the altruistic cause it promotes. Judging whether a group is representative depends on a group’s organisational structure and strategy, its aims, representative claim and importantly member and supporter expectations.

To evaluate the quality of representativeness, representation literature tends to resort to responsiveness as an indicator (Rehfeld 2006; Severs 2010). But responsiveness matters differently for groups that form their positions based on member interest and participation and for those that form their positions based on expertise or empathy. Responsiveness is traditionally judged by looking at how responsive the representer, or the leadership of a group, is to its members, because that traditional conception of representativeness is tested as accountability and authorisation between affiliates and group leaders (Halpin 2010, 23). This is however only valid for promissory/anticipatory groups. The responsiveness of gyroscopic representation is the overall policy portfolio and its coherence with the groups’ principles. The representative-audience relationship is different in gyroscopic and surrogate groups. In order to understand how responsiveness may be judged, it is important to question the aim of representation, is it the good of society, the good of the environment or what members want? In other words, the evaluation of representation using responsiveness has to be done depending on the acceptability dimension (based on how positions are formed).
There are different demands of responsiveness by member groups and supporters. The act of accepting a representative (claim) as legitimate by supporters can require varied levels and types of responsiveness. For example, a person might be satisfied with reading what Greenpeace is doing about whaling in Japan and support a campaign financially or by signature, but may not be interested in any further information regarding the campaign. Another person might wish to be kept in the loop about the overall activities of its group. Yet another one might want to take part in the selection of issues the group prioritises. Supporters are not all the same and they require different levels and sorts of attention. At the individual group level it becomes obvious that the representative task is not straightforward, and one can suspect that the larger and more diverse the supportership, the more challenging it is to respond to increasingly diverse demands. The RSPB with its over one million supporters, for example, needs to keep representing the interests of its traditional supportership of bird-watchers, but also cater for the interests of the broader environmental conservation enthusiasts as well as raise awareness towards local, national, EU and international environmental policy issues. There are a number of channels for responsiveness a group may make use of, such as emails, online conferences, social media, print, face-to-face meetings, opinion polls or surveys. Groups often do their own or commission government- and market-independent research. Whether or not their usage can help with a group’s representativeness depends on how well it is tailored to the specific characteristics and demands of members and supporters.

The above also explains why it is difficult to design clear yardsticks for the empirical evaluation of how representative groups are. Organisational credibility and trust are factors that may be judged, but cannot easily be measured or quantified. Organisational credibility, which is reflected in a group’s media image and its popularity in society, can be evaluated by looking at news reports, reporting and feedback on events, campaigns and policy positions. Generally the degree of activity of a group and the number
and quality of opportunities it provides for exchange with members, supporters and society will also have an impact on its image, but this again depends on supporter expectations. The popularity of labels or their ‘brand’ also reflects their popularity in society. The obvious indicators which are easier to track down are the number of members and supporters. These can be, and this is by no means extensive, fee-paying members or supporters, activists, volunteers and donors, subscribers to newsletters, signatories of specific campaigns, and participants at events, Facebook page/group/event likes, Twitter followers and bloggers. Even though it might be slightly more straightforward to ‘count’ popularity this way, it is still impossible to determine a threshold above which representativeness is achieved or below which there is none. For example one cannot say that 20,000 supporters make a group representative but 19,000 do not. In fact most, including large established groups, have difficulties knowing how many members, supporters and volunteers they actually have.

The acceptance dimension moreover has implications for the interest group system as such. It indicates that group representation, regardless of the participation of members, may be valid and legitimate because it is accepted as such. Kohler-Koch concludes for the EU interest group system as a whole that the representative claim of EU level groups is valid because “citizens have accommodated to the system and because the respective stakeholder audience accepts the outcome of conflict settlements as being legitimate” (2010, 112). This research does not argue for a dismissal of the traditional concept of representativeness based on democratic participation nor does it argue that the acceptance dimension on its own is sufficient. What it does do is suggest it is problematic to solely apply the traditional concept to the varying types of groups with their different organisational structures and strategies, including types of members and supporters, interests and aims. Groups have diverse representative claims, with regards to what or whom they represent and how they represent.
Hence the concept of representativeness has to be adapted to these differing empirical conditions.

**Professionalisation is more than bureaucratisation**

In addition to the theoretical limitations of the assumed professionalisation-representativeness dichotomy, the traditional argument applies a limited empirical conception of professionalisation. Professionalisation is not only bureaucratisation as depicted in corporatist studies (see chapter one), but also includes professionalisation in communication and new media technology applications. The theory of representation of groups dealing with the professionalisation criticism is thus basing its argument on an outdated conception of professionalisation. The more comprehensive conception of professionalisation means that the affects professionalisation is assumed to have on group representativeness need to be reconsidered.

The literature considers internal democratic structures where the leadership is elected and members partake in formal decision-making a condition for groups (and their leadership) to be representative (see section on acceptability in this chapter). Traditional group scholars hence analyse the impact of professionalisation on this narrow type of representation. The problem traditional group scholars detect in professionalisation is its hindrance of this traditional type of democratic representation (Jordan and Maloney 2007; Kohler-Koch 2009, 54f; 2010, 110ff; Warleigh 2000; 2001). They conclude that one is incompatible with another. Second, they mostly see professionalisation in the form of bureaucratisation and institutionalisation (Kohler-Koch 2010, 110ff Warleigh 2000; 2001). However, professionalisation is more encompassing than bureaucratisation and crucially includes the application of new media technologies. There is scarce mentioning in the interest group literature of
professionalisation effects in terms of new media technology on the representativeness of advocacy groups active in the general interest. Trenz, for example, who defines representation as a claim for publicness or gaining public visibility, has detected a change in the “representative mode of political communication” as a result of the Internet (Trenz 2009, 15). Hence, the conceptual problems are that traditional group scholars look at the effects of an out-of-date understanding of professionalisation on a narrow conception of representativeness.

There is also a general need for groups to professionalise, which is vital for many groups to get support and for their survival and influence in the future. This is due to social, political and technological changes in the EU. On the one hand, the nature of many issues, such as climate change, that transcend national borders, makes it necessary to deal with them at higher (EU) level. On the other hand, the communication and engagement behaviours of people are changing due to new media technology (Salter 2003). This in turn requires the adaptation of organisational structures and strategies to these new attitudes of communication, participation and representation. These adaptations are necessary for groups in order to be representative of the voices of the people in the way they wish to voice them (e.g. through Facebook likes, online petitions or emails rather than paper petitions or engagement in person). Even though many corporatist scholars emphasised the developments caused by social, economic and technological change from below, including the decline of class and religious cleavages and the changes in communication, the existing group professionalisation literature so far hardly includes professionalisation changes in communication as a result of new media technologies.

A better understanding of professionalisation in particular in relation to new media technologies does not mean recognition or professionalisation has no negative impact on representative structures of groups. But the differentiation of types of professionalisation in connection with the re-definition of representativeness sheds a different light on what
impact recognition has for different group representation structures and strategies. Professionalisation does not necessarily lead to a loss of representativeness.

Professionalisation has varying implications for different types of groups

The impact of recognition and the resulting bureaucratisation takes different shapes and has different consequences depending on what type of representation a group pursues and what organisational strategies and structures a group has. Clearly, all groups have to be effective to be considered legitimate in the eyes of political decision-makers. In order to become more effective, groups adapt their organisational structures and decision-making. However, this adaptation varies, depending on existing organisational structures and strategies. Federal groups might streamline their cooperation with national and sub-national member groups whilst increasing expertise. Small cause groups find expert niches. Large member groups might set up focus group structures to avoid bureaucracy and be more effective for example in responding to consultations. Large cause groups such as the RSPB try to balance supporter expectations, whilst broadening their portfolio, in order to retain existing as well as attract new members and consequently increase political weight.

But above all, professionalisation has different impacts on groups, depending on their organisational representation structures and strategies, or their basis of position formation. The traditional promissory groups for example form their positions based on membership participation. If their organisational structures of representation streamline and reduce participatory opportunities, affecting the say members have over positions formed, then their representativeness is jeopardised. However, for gyroscopic and surrogate groups on the other hand, who form their positions based on scientific knowledge, group principles and empathy, bureaucratisation impacting member participation in position formation
does not matter for the representativeness of the position. This is because their position formation does not require member participation. These groups have supporters expressing their support in ways other than participating in internal decision-making. Still, whilst bureaucratisation is largely irrelevant for gyroscopic and surrogate groups, professionalisation in terms of expertise and new media application can be beneficial for both dimensions of representativeness.

There are a number of ways outside formal participation structures for a group to represent and be responsive to the interests of member groups and supporters as well as the public. These include direct action, volunteering, signing petitions, donating or simply joining a group and paying membership fees. Alternative channels of communication provide advocacy groups with representativeness despite, and indeed at times because of, professionalisation of the leadership. The study of advocacy group recognition also has to recognise the practical changes taking place in terms of communication tools and representation mechanisms. The development and application of new, in particular online, technologies, such as social media and its impact on the change of organisational structures of decision-making and representation must be taken into account. On-going technological developments have meant important changes to the ways individuals, organisations and government institutions communicate with each other and they have completely changed the dynamics and dimensions of communication and representation of interests (cf Chadwick 2006, 83-143). The technological changes in society and the resulting behavioural changes require the concept of professionalisation to consider these technologies and their potential for group representativeness. New media technology not only changes informal organisational structures and strategies of representation, but at a more general level it changes the way society behaves. It changes the way people, or rather members and supporters, interact with groups, voice their interests and how they want to make their voice heard. It changes the
concepts of representation and participation. In turn and though slowly and lagging behind, groups react to these changes in society and behaviour. Groups are emerging that are entirely online and have no formal presence, and established groups turn to new ways of online interest representation.

There is hence a need to understand organisational changes through professionalisation and the effects or rather counter-effects on co-optation dynamics. Though certain restrictions hold true, such the limitations of the use of new technology to certain parts of the population and hence of group members and supporters, professionalisation in the form of incorporation and application of social media tools may have the potential to enhance representativeness in most cases to at least some degree. It increases outreach, facilitates engagement and participation rather than passive one-way information, and it erases geographical restrictions by facilitating interaction across various horizontal and vertical geographical and organisational levels. It is more instant in terms of information and reaction, reduces the need for resources, which is a problem for many smaller groups in particular. It provides more case or issue-specific opportunities of engagement and provides individuals with the opportunity to choose not only where and whether, but also how and when to get engaged or express support. Overall it is likely to give members, supporters and the general public a greater sense of ownership over the debates groups engage in.

**New media professionalisation: Counteracting bureaucratisation**

This thesis re-visits the professionalisation criticism taking into account not only an updated version of representativeness as defined above, but also an updated version of professionalisation in order to assess the current potential of representativeness of groups. Advocacy group scholars researching the impacts of professionalisation on group representativeness can benefit from a dialogue with media
professionalisation studies. Politics and media communication scholars investigate professionalisation as in the increased application of new media technology such as the internet and social media. They analyse a sophisticated sourcing and sharing of information for organisations and the application of internet technology as tools of participation for individuals, also referred to as online activism as opposed to offline activism. The majority of scholars focus on individuals, or individuals as members of political groups, which is mostly defined to political parties. Internet and media studies are less theory-based and focus more on quantitative empirical studies analysing the usage and activism of professional tools. They look at mobilisation of political engagement and voting behaviour, analysing differences between age and other pre-conditions such as political interest (Gibson et al 2004; Pickerill 2003). Interest group scholars and internet and media scholars hardly talk to each other, although they could benefit from exchanging knowledge on professionalisation. Researching group representation should make the connection with research in new information technologies and web 2.0, two areas of research so far largely unconnected and under-researched. The dominant normative ground for media studies, nevertheless, is similar to traditional studies the need for active members, tends to look at political parties and focusses on mobilisation rather than representativeness in its diverse forms (Gibson, Nixon, and Ward 2003; Lusoli and Ward 2004). Still, the advocacy group professionalisation literature can benefit from insights on technological potential for communication and participation as well as its usage in society, by groups and their supporters (cf Castells 2001).

Professionalisation in new media technology has the potential to counter bureaucratisation tendencies and add alternative channels of organising representation (Pickerill 2003, 58). Professionalisation in the literature on internet and communication also refers to changes of organisational structures and strategies brought about by new media technology in particular around the internet (Castells 2001; Pickerill 2003).
The internet has facilitated a fast and cheap distribution of information and coordination of logistics with broad reach. It is characterised by a network dynamic that resembles that of groups and movements. It allows groups to put greater pressure on decision-makers from more sides more quickly, enables agile and rapid strategies of countering opponents and critics and facilitates allying (or rather persuades would-be allies). Technological professionalisation has also been seen to lead to institutional innovations, for example issue networks and world/European forums around particular (sets of) issues. The internet created new forms of protest, such as umbrella coalescing and spider-web organising, which permits action along the spokes of the web, without leadership from the centre or top. The passive nature of the lay public and indeed many members and supporters has furthermore led groups to adapt their organisational strategies to member demands and characteristics, for which the internet has provided great facilities, inciting professionalisation in terms of the use of new media technology. Several authors note how making use of the internet (Van Rooy 2004) has made groups more dynamic, since they can form different networks at different times, they have easier access to media, and possess cheaper and faster geographic mobility and cultural interaction. This enhanced understanding of professionalisation need not ignore certain dilemmas of bureaucratisation and institutionalisation. Moreover, organisational culture, individual people’s skills and the issue advocated impact and may limit the potential of online technologies to balance out bureaucratisation (Gibson et al 2003). However, it puts the effects of professionalisation in modern perspective. Face-to-face meetings remain important, in particular for promissory groups, but new media can offer supplementary channels of communication (i.e. email, Google docs, Twitter groups) and participation (i.e. online conferences, Skype), making groups less dependent on physical meetings and resources.

Formal participation structures in traditional promissory groups of course have the important function of limiting dangers of isolation from
constituents and co-optation, in particular for EU level groups. Informal online tools, however, have the potential to enhance political inclusion by connecting individuals, including leaderships and supporters, and communities horizontally and vertically across territorial and organisational levels, as well as across issues and societies (qv Pickerill 2003, 27). In established environmental and justice groups, new media technology has been found to be assisting and improving the performance of existing group functions to achieve aims more efficiently (Gibson et al 2004, 198; Pickerill 2003, 28). In fact it strengthens groups’ resistance to bureaucratisation pressures, because groups can be efficient without hierarchical structures, without many resources and without the need for geographical presence (Pickerill 2003, 28, 58). New media technologies are particularly fruitful for groups that face the challenge of remoteness between leadership and members (Pickerill 2003, 27). They help smaller groups to overcome restrictions of resource scarcity, because they do not require physical presence for communication. Less formal, non-hierarchical groups are also found to be able to make most use of new media technology because of their flexible structures, open to free experimental and innovative use of these technologies (qv Gibson et al 2003, 198). New media technology in particular improves awareness and political weight of single or focused issue and shared goals groups and campaigns (qv Gibson et al 2003, 198). New media technology thus enhances the communication infrastructure (cf Castells 2001, 164) and informal as well as formal participation mechanisms. Responsiveness, political inclusiveness, the identification with political communities and informed opinion formation are not only important conditions of representativeness, but also bring the citizen closer to EU politics.

Counteracting bureaucratisation, professionalisation in new media technologies also offers alternative modes of engagement. Most critics see bureaucratisation as problematic full stop; but some do make a difference between a necessary degree of professionalisation and elitism (Adam 2008)
and too much professionalisation (Van Rooy 2004). For example one argument is that professionals are necessary to facilitate the voicing, mediation and translation of the interests of the masses (Adam 2008; Parkinson 2006; Saurugger 2007). In this context it is important to note that traditional group scholars point out that it is not only the groups who are not offering participation opportunities, but that citizens or rather supporters do not actually wish to get actively involved. What they fail to take into account is that professionalisation in terms of the use of internet technology has paved a way for members, supporters and citizens to show their support the way they prefer, whether it is financially as regular subscribers or donors, actively through direct action, campaigns or signatures, or in solidarity through virtual membership. Without the need to increase staff or financial resources, groups are able to offer alternative modes of engagement which are more adaptive to citizens’ demands. The point is not only that some professionalisation is clearly necessary for the creation and voicing of demands, but professionalisation can indeed be counteracting bureaucratisation tendencies. Professionalisation thus has been instigated or rather spurred on by two additional factors to those mentioned earlier, one being the internet and the other being the passivity of citizens and members.

**New media technology: enhancing dimensions of representativeness**

New media technology can help promissory groups re-connect with their base. Gyroscopic groups benefit because it provides structures for input of local expertise into the formation of positions. Expert opinions and grassroots experience can be exchanged and inform positions and support. Groups can make use of transparency and information tools, as well as be responsive to their affiliates through informal ways of expressing and debating affiliates’ and leadership’s interests. New media technology offers an abundance of potential channels that can provide the leadership of a
group as well as affiliates and broader public mutually with a sense of the general as well as specific interests, opinions and expectations of both. Leaderships can provide arguments; raise awareness, as well as challenge members’ and supporters’ opinions - and vice-versa. Amongst these media technologies are websites, email lists, online conferences and social media such as Vimeo, YouTube, Facebook, Twitter, fora and blogs. Moreover groups make use of online surveys and policy or focus groups to receive member and supporter views which influence policy directions (qv Maloney 2009, 283f).

Expertise and more fluid mechanisms of communication and participation also have the potential to enhance the professional image of a group. The acceptance of gyroscopic and surrogate representation relies on its professional qualities generating trust in their expertise and ability to fight for the cause and the values supporters have subscribed to. A more professional image has the potential to increase the acceptance dimension also with regards to the broader civil society, particularly relevant for surrogate groups.

Worth noting in the context of professionalisation and expertise is that representation is not mere agency (Edmund Burke interpreted by Eulau et al. 1959, 743). An environmental group leader who does exactly what I, as an environmental science and politics amateur, would do in her place, does not do a good job in representing me (cf Pitkin 1967, 144f; Rogowski 1981, 396). People want professionalism and expertise in representation. Representation is not merely a fulfilment of promises, but it is crucial that advocacy groups engage in creating and, if necessary, altering promises. In the case of EU issues which are said to be remote from the citizen and often very technical and difficult to understand for the amateur, it is necessary to have a group provide information, explanation and constituency-tailored framing of issues. Groups help their constituents and beyond by providing different ways of framing the argument.
Groups not only challenge government positions, but also challenge and engage with citizens opinions, whether there is direct interaction or not. As an example, in the case of a no-fly zone over Libya, Avaaz listened to the vast majority of its supporters when supporting a no-fly zone. But when a small number of supporters raised significant, reasoned concerns with this position, Avaaz put these in context and opened a discussion to re-consider its position on Facebook. Avaaz thus played a crucial role in facilitating and steering a debate and introduced important perspectives of a minority that challenged the opinion of a majority. Another example is the decision of the Campaign to Protect Rural England (CPRE) concerning the building of wind turbines. The group challenged its members, who were generally against the alteration of the landscape, by reasoning the necessity for the creation of more renewable energy sources. The group leadership’s encompassing knowledge put member opinions in the perspective of the wider societal benefits of their policy position. The leadership decided for the benefit of the wider society, rather than the beauty of the landscape to supporters (CPRE official 2011). Both of these examples try to show that a more dynamic and professional representation can enhance the democratic quality of decision-making, because it can create better informed opinions that are ultimately beneficial to a larger part of society. It also shows that representation does not only mean the aggregation of interests, as is often conceptualised by scholars of groups (qv Kohler-Koch 2008, 12f). In contrast to what is assumed in the literature, the hypothesis here is that as groups become more professionalised, this has the potential to positively affect their credibility in the eyes of supporters as legitimate representatives of their interest.

The professionalisation of groups in terms of their usage of communication tools, such as new ways of online participation, facilitate engagement in a way that does not necessarily require formal membership and may even act beyond groups’ own member/supporter base. Groups indeed do not only promote the interest of their members/supporters, but
beyond (Frantz 2005, 183). Citizens can use the internet to participate outside formal organisational structures but nevertheless impact on formal agendas of organisations (Ward and Gibson 2009, 38). Taking social networks as an example, citizens can form and join groups on specific issues, thereby displaying their support for an issue that may be put forward by a group they are not formally affiliated to. Groups can be responsive to affiliates and the broader public’s preferences by responding to indications of interests and opinions in the media, such as public opinion polls or media coverage of public debates (qv Kohler-Koch 2008, 12).

Conclusions

This thesis puts forward progressive conceptions of representativeness and professionalisation. It does not deny the continuous danger of co-optation and bureaucratisation also to modern forms of advocacy organisations. Nor does it glorify the potential and actual use of new media technologies in advocacy groups as mechanisms to achieve representativeness. It further does not attempt to make any normative claims about groups’ democratic agency as such. Rather, it is a positive theory challenging the assumption that groups becoming more and more professional are losing representativeness, which in turn is considered to affect their democratic agency.

Organisational structures and strategies of groups are more diverse than the traditional conception of representativeness allows for. Judging groups’ representativeness based on member participation is inappropriate in a number of cases. It does not account for the diverse roles and strategies groups implement with regards to representing an issue. Groups form their positions not only based on membership input (promissory/anticipatory), but also based on expertise, experience, principles (gyroscopic) and empathy (surrogate). Professionalisation has different impacts on the representativeness of diverse groups. Moreover,
the definition of professionalisation in the traditional group literature is largely defined to bureaucratisation and mostly overlooks the role new technology can play for enhancing representativeness. The redefinition of both conceptions, representativeness and professionalisation, requires a revision of their assumed relation and the implications for the Commission’s strategy to enhance its democratic credentials. The democratic deficit debate, focussing on institutional properties, has to truly take into account the properties of advocacy groups to understand the dynamics of their democratic agency.

Membership-logic cannot explain why members and supporters support or trust their leadership to be representative of their values and interests when they have not been formally involved in the formation of positions. Instead, organisational credibility and a groups’ expertise explain why cause groups are perceived as representative by supporters and beyond. The membership-logic is also ignorant of the – democratic - choices individuals make with regards to how they would like their interests to be represented. Crucial to the above argument is the observation that bringing citizens closer to the EU does not translate into more participation, as opposed to what is widely accepted in participatory literature. Quoting Van Wessel, “we should not mistake a will to be taken into account more, for a will to participate more” (2010, 455).

However, the acceptance dimension and informal communication can only be assessed case-by-case. Which advocacy groups are representative and have democratising potential is an empirical question, not one that can be concluded by definitional fiat. Moreover, the representativeness of claims made in consultations should be considered based on the issue in context. Qualitative empirical research is required to detect whether professionalisation takes place at the cost of representativeness, or whether groups are actually both professional and representative. Professionalisation has the potential to enhance representativeness and hence does not hamper groups’ democratising potential per se.
This research does not make any normative claims with regards to groups’ democratising qualities, their accountability or the democratic legitimacy of the Commission, though of course the behavioural dimension of groups has normative implications. If professionalisation is compatible with representativeness, then the normative strategy of bridging the gap through engaging advocacy groups is feasible to pursue.
4 Methodology: Professional and representative groups?

The thesis examines the impact of recognition on the internal dynamics of environmental advocacy groups in two EU policy cases. It considers whether professionalisation takes place at the cost of representativeness, whether professionalisation in fact accompanies representativeness or indeed whether professionalisation enhances representativeness. Commission officials, as well as EU, national and sub-national environmental groups were interviewed to understand how the input into specific EU consultations is constructed. The interviews investigated how positions were formed within groups and their member networks and what the groups’ self-perceived role and professional image is (acceptability dimension). Additionally, the groups’ use of new media technology such as emails, mailing lists, websites, blogs, Facebook, Google, Vimeo, YouTube, and Twitter, was analysed to appreciate what these technologies were applied for and how, in order to understand their potential to enhance representativeness. Additionally, new media technology application in the particular issue areas gives an insight into how member groups, but also supporters, choose to engage and be represented in EU groups (acceptance dimension).

If groups can professionalise and be representative, the implication is that there is potential for the Commission to enhance its democratic credentials by engaging with advocacy groups – despite, or perhaps because, of professionalisation. Though the argument for a renewed concept of representation holds true for national groups as well, it is in particular the EU level, with its multilevel network structure of representation and search for a cure to its democratic deficit (Saurugger
2008a, 151), which calls for a renewed analysis of the dynamics and a reconsideration of the dimensions of group representation.

The following chapter first introduces the chosen interview and case study methodology and then elaborates in more detail how, why and which groups and policy cases were selected. The conduct of expert interviews as well as the use and collection of data are then described further and the groups and policy areas introduced. Lastly, limitations to the thesis’ research question and methodological framework are explicated.

**Case study approach**

The methodology chosen is case studies in combination with qualitative semi-structured interviews. This methodology was chosen because it enables a precise tracking of the degree of professionalisation we find in a group as well as showing how groups ensure representativeness, which importantly includes informal ways of decision-making, opinion formation and support that cannot be derived from formal documents. Moreover, it enables a look into how day-to-day practical reality modifies or qualifies what the formal guidelines prescribe. The thesis investigates group practices, behaviours, role perceptions and trust. This requires the exploration not only of information available, but also of information that can only be generated during the course of personal interviews. This kind of analysis best provides the data on professionalisation and representativeness for this thesis, because it investigates the why and when: why are groups representative and under what professionalisation circumstances? Moreover, qualitative analysis facilitates the purposeful selection of cases (groups) and allows testing existing as well as challenging hypotheses. *Does recognition or rather professionalisation really mean a decrease in representativeness?*

This research question sets the frame for the case study approach. The claim in the literature is raised in relation to the Commission’s strategy
to enhance its democratic quality of decision-making by engaging with advocacy groups, amongst others. This requires a case study that looks at EU level groups engaged with the Commission. Further, the hypothesis in the traditional literature is that this engagement leads to a professionalisation of groups, which hampers their representativeness. The challenging hypothesis of this thesis is that this engagement might lead to a different kind of professionalisation than so far assumed and representativeness might indeed not necessarily be affected negatively. The focus is not so much on whether or not groups professionalise, or indeed why, since this is widely studied already, both in general, as well as as a result of recognition (Hull 1993; Saurugger 2006; Adam 2007). However the thesis looks at the type of professionalisation and the effect it has on organisational representativeness that has so far been misinterpreted, mainly as a result of out-dated conceptions of professionalisation and representativeness. Hence the case studies aim to show what professionalism of groups engaging with the Commission looks like and how this affects organisational representativeness. The impact of engagement can best be traced by selecting specific EU policies, to which the organisational formation of a decision and internal interaction (acceptability) and the expression of support (acceptance) can be explored. The task is then to test whether these groups engaging with the Commission are professional as well as representative. The issue under investigation is not only to test the correlation between professionalisation and representativeness. Rather, this thesis questions the conceptions of group professionalisation and representativeness. It tests but also adds to different dimensions of the conceptions of professionalisation and representativeness and the relation between the two.

Some methodological criticism is raised against the selection of restricted case studies in terms of neutrality and for being less representative than quantitative analysis. However, these risks can be limited or even eliminated through transparent and clear approaches to
analysis for example by clearly outlining what and how data is used to explain individual conceptions and hypotheses. Interviews were used to provide evidence on how organisations interact and form positions in practice based on background information available in the form of documentation, such as statutes on internal communication and participation as guidelines. Several questions collect numerical data such as the size of a group, but a large number of questions collect attributes, which involve subjective interpretations - it is important that the research method minimizes ad-hoc subjective interpretations and enhances the likelihood of replication. Interviews were recorded to enable reliable documentation and notes were taken, in order to be able to revisit exactly what was said during analysis. They were then analysed and open questions coded according to indicators of professionalisation and representativeness. To limit the scope for subjective interpretation of more open questions, established practices to code data were applied to be able to discern and keep record of conceptions, definitions and themes in a consistent way. In terms of the evaluation of data retrieved from interviews, if possible, questions were posed in a way that clearly facilitates direct interpretation and comparison. Each interview took between 45 and 90 minutes. Since this project is not about identity but about internal organisation, rhetoric/language used in the interviews did not matter in this context.

The sample selection considers and is aimed at the generalisation of results. However, the representativeness of a qualitative sample, as in the generalisability for the large population, is no expedient criterion (Helfferich 2009, 172). Qualitative research wants to find if and how the 'general' can be found in a special case. Generalisations from qualitative research want to reconstruct typical patterns, not detect re-distributional conclusions. Instead of the representativeness criterion, in objective hermeneutic there is a need for the precise definition of a sample and an inner representation of the sample (Helfferich 2009, 173f). Since this thesis
wants to reconstruct typical patterns of representativeness and professionalisation in EU advocacy groups, in particular cause groups, the selection of the sample was restricted to environmental groups who are active at EU level, are professional and amongst which we find many cause groups because of the topic. The inner representation of the sample of these environmental advocacy groups needs to be varied in order to avoid premature generalisations (Helfferich 2009, 174). The sample case studies include cause groups with differing organisational structures and strategies, such as EU (global) advocacy groups or EU umbrella networks53, with different degrees of professionalisation and varied channels of representativeness. Though the selection of interview partners was predetermined and straight-forward, as interviewees needed to be gatekeepers with policy-specific information on position formation, the variety of groups and people interviewed was increased by asking interview partners about more potential gatekeepers (snowball system) (Helfferich 2009, 175f).

53 EU or global advocacy groups, such as Greenpeace and WWF, have a global strategy and brand with members groups at national and sometimes regional levels formally integrated in one organisation. All groups adhere to the global guidelines. EU network umbrella groups are coalitions of independent groups active at EU, regional or national level.
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<th>Type of representation</th>
<th>Beneficiaries</th>
<th>Basis of positions formed</th>
<th>Expression of member groups' support</th>
<th>Expression of support of members' of member groups*</th>
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<td>Promissory</td>
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<td>Anticipation of member views (positions make sense taking into account member characteristics - prudential)</td>
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<tr>
<td>Gyroscopic</td>
<td>Cause (non-human)</td>
<td>Group values, principles and common sense, knowledge and expertise</td>
<td>Number of member groups, member campaigns on the cause, trust and opinion on surveys</td>
<td>Trust and opinion surveys, number of members and supporters, volunteer and activist support, donations, number of subscriptions to newsletters and campaigns, Facebook likes and comments, Twitter followers/Tweets/Re-tweets, blogs, websites, emails</td>
</tr>
<tr>
<td>Surrogate</td>
<td>Cause (non-human)</td>
<td>Group values and principles, empathy with beneficiaries (beyond member and supportership)</td>
<td>Number of member groups, member campaigns on the cause, trust and opinion on surveys</td>
<td>Trust and opinion surveys, number of members and supporters, volunteer and activist support, donations, number of subscriptions to newsletters and campaigns, Facebook likes and comments, Twitter followers/Tweets/Re-tweets, blogs, websites, emails</td>
</tr>
</tbody>
</table>

* List not extensive

Table 1: Dimensions of group representativeness
Expert interviews

The type of interview method used to analyse the case studies is systematising expert interviews. This means that experts in their fields were chosen as interviewee partners to retrieve specific knowledge of action and experience. In this form of interviewing “it is not the experts themselves who are the object of investigation; their function is rather that of informants who provide information about the real objects being investigated” (Bogner and Menz 2009, 47). A balance was sought between including closed questions designed to retrieve biographical data of staff as well as easily comparable data on perceptions of roles and concepts, organisational structures and strategies and values. Open questions gave space to narratives. That way two of the main criticisms towards expert interviews were tackled: lack of standardisation and quantification of data and too narrow, guided structure limiting interviewees own views and additions to the conversation (Bogner and Menz 2009, 44). A systematic approach to the analysis of the open narrative ensured comparability also of the non-quantifiable data and the embeddedness of interview, methodology and theory. The first part of the questionnaire was designed to retrieve more general information on staff and the group, and the main part focussed on organisational structures and strategies as well as acceptance in context of the specific policy. This encouraged narratives on case study related aspects such as position formation on a specific issue, which generated information for the general criteria of the formation of positions (Meuser and Nagel 2009, 33). Narratives also allowed for insights to the personal interpretation of rules and discrepancies between leadership and members/supporters and were able to provide meaningful examples of professionalisation and alternative representativeness structures in practice (Meuser and Nagel 2009, 34).

The analysis of the interviews went through a number of stages of qualitative analysis exploring expert knowledge (for a detailed explanation
of this methodology see Meuser and Nagel 2009). Interviews were taped and relevant passages transcribed. These passages were then paraphrased into thematic units, providing information for the representativeness and professionalisation indicators. Examples are new media technologies applied or formal decision-making structures. After paraphrasing, the units were put into thematic order and in a next step these thematic units were compared between the different interviews. A sociological comparison of the empirical findings categorised commonly shared knowledge from the interviewees that can claim general validity or validity in the given context. For example, the comparison of social media usage within groups made clear that amongst EU environmental groups, there has recently been a realisation of the importance of using these as interactive tools with members- and supporters. It can be generalised from the sociological comparison that environmental groups are in the process of applying more and more social media for interaction internally with member groups and externally with supporters and the public. Finally these empirically generalised findings were framed to form typologies and theoretical conceptions. In the example this means that groups do not only professionalise along traditional criteria, but most importantly also with regards to new media technology, which in turn has implications for their representativeness. Different groups make different use of new media technologies and this, depending on different organisational structures and strategies, can have a positive impact on their representativeness.

Data collection

Using criteria established in chapter one and two, the questionnaire was designed to retrieve data on the concepts of professionalisation and representativeness in order to facilitate their assessment for each of the groups interviewed. In conjunction with information retrieved from other primary sources such as group and public websites, Agence Europe, statutes and minutes, interviews provided the primary data of this thesis.
constituting the core means by which a detailed understanding of the scope and type of professionalisation and the practices as well as the definition of representativeness could be obtained. In particular, personal interviews are a unique source of reference providing information on perceptions of roles of leaders/members/supporters, beliefs and trust which otherwise would not be obtainable. Moreover interview data was used to test claims about group operation, estrangement of the leadership from members and elite domination. Again, the focus was not on the changes of professionalisation, though that was captured to a degree, but on the state of professionalisation within a group in order to test the hypothesis that groups professionalise their new media communication. Likewise, the emphasis was not on changes in representativeness, but in capturing the actual practice and character of group representativeness in light of the more comprehensive conception of representativeness, taking into account the organisational and strategic diversity of groups.

Data on professionalisation was collected on the traditional conception of bureaucratisation, such as the degree of specialisation and expertise of the EU group leadership and the centralisation of organisation, and on a more comprehensive conception including new media technology usage. Data was retrieved from group websites, including social media sites, and interviews with Commission officials, the groups in question as well as their member groups. Data was collected on the age of the organisation, number of staff, their area of responsibility (how specialised are staff portfolio, e.g. are there specific communication officers or policy officers?), their employment status (full-, part-time or volunteer) and sources of funding (membership, donations, government, foundations, private). In terms of expertise, data was generated on their professional qualifications and career backgrounds, such as if staff have work experience or are qualified in public or private management, consultancies, marketing, law firms or EU institutions and on which level (EU institutions, EU group or grassroots experience). The retrieval of data on expertise further included
the generation and use of scientific studies and experience on the ground by groups. Information on organisational decision-making structures and position formation were found on websites, in annual reviews and statutes as well as inquired about in interviews. In order to assess the hypothesis on professionalisation of internal communication and the formation of positions, data was collected on the width (access) and depth (variety) of the usage of internet communication technology and its usefulness for information, participation and communication, as experienced by EU groups and their members/supporters. Processes of professionalisation were taken into account at all levels of organisation (leadership and member organisations) to be able to understand the internal variances of professionalisation and consider the relevance of professionalisation for representativeness at all organisational levels. Results on professionalisation and representativeness between different groups were compared in order to understand if claims that certain organisational features make a difference in terms of the representativeness of groups can be confirmed.

The main professionalisation criticism in the traditional literature is that groups, as a result of recognition, will focus on influence logic over membership logic – in other words the literature claims that there are resource dependencies as well as institutional access conditions that will lead groups to focus on efficiency rather than internal communication. The hypothesis of this thesis is that professionalisation in new media technology in fact enables groups to counteract bureaucratisation and be more member focused, because it makes member/supporter engagement less resource and location dependent. Groups professionalise their internal communication by applying new media technology, thereby reducing resources such as time, money and staff. Respondents were asked to indicate what resources lobbying and networking requires and how they divide time and resources spent on lobbying/networking versus communicating with members/supporters. These questions also facilitate a
comparison of the distribution of time and resources spent in member versus supporter groups.

Crucially, one hypothesis of this thesis is that there are different types of representativeness made up of two-dimensions, the acceptability and acceptance dimensions. Therefore EU groups and member/supporter groups were asked how they define representativeness; whether they consider themselves as being representative and they were confronted with different conceptions of representativeness. It indicates the importance groups attach to being representative of a cause or members/supporters within their own group and in general. It specifically investigates whether positions are formed based on member input and demands, or on scientific data, experience, principles or empathy (acceptability). A number of questions were designed to inquire whether groups that are professional cause (advocacy) groups, are considered representative in the eyes of their members groups – hence whether they are accepted as representative. Member groups were questioned on whether they felt represented by EU groups (acceptance). Do members groups accept the EU groups they are a member of as representative of their values and positions?

The answers to these questions facilitate the comparison of different degrees of professionalisation on the one hand and the perceptions of representativeness on the other. To this end EU groups were additionally presented with a list of environmental groups and requested to identify whether they consider them professional and representative. This moreover facilitated a comparison of conceptions of representativeness amongst organisational levels. Beyond this the answers gave an indication on perceptions of representativeness in the group sector more generally.

The collection of data on representativeness criteria was approached in two ways: On the one hand active involvement through various mechanisms of participation were analysed on group websites, such as new media communication, interactive tools and email lists. On the other hand
the application of these tools in practice as well as further internal participation mechanisms were investigated in the personal interviews. Questions about application of internet technology and social media, as well as other more traditional forms of communication, give insights about the degree of transparency and deliberation, as well as responsiveness, inclusiveness and embeddedness of internal communication and position formation. Questions on internet technology and other forms of communication and decision-making also try to go beyond the traditional conception of representation through members and include data on the support and participation of supporters as well as other interested parties. In this context, efforts made by groups to demonstrate responsiveness were observed. Responsiveness helps understand whether groups advocate the interests of their cause/members, creates trust and is an indicator for representativeness, depending on the groups’ structures and strategies, including member and supporter demands. The necessary degree of responsiveness to create trust and representativeness depends on the political aim, values and representation demands of leaders and members/supporters of a group – hence the type of representativeness a group is practising (see chapter two).

Questions about role perceptions of staff and members and supporters were posed to both EU and their member groups, in order to shed light on claims in the literature that there is a moderation in ideology and groups become self-interested (in other words groups or rather their leadership increasingly perceive themselves as working for their portfolio as opposed to for members/supporters or indeed their cause). This can help understand whether there is a different view on how radical or moderate positions put forward should be but crucially also who decides on that. For example, a moderation of claims in order to find common ground with a network of EU groups and with the Commission might well be favoured by members/supporters. A WWF EU group member, due to the manifesto and political aim of the group, might have very different views on
the matter of cooperation and compromise then a Friends of the Earth Europe or World Economy, Ecology and Development (WEED) member. Additionally, the organisational role and political aim expressed on websites and printed material is compared to interview data in order to detect discrepancies that could indicate leadership deviation in practice from group manifestos.

**Advocacy group and policy cases**

The interaction between groups and the Commission as well as within and amongst the network of group members, supporters and coalitions is investigated in the cases of five EU environmental groups using the examples of recent decision-making in water policy and greenhouse gas emission reductions policy.

The intellectual rationale for selecting environmental groups reflects the aim of the thesis to highlight gaps in the existing literature. The thesis challenges the dominant argument that groups necessarily lose their representativeness as they professionalise. Rather than undertaking a comparative or in-depth study of the representativeness and strategies of the groups under investigation, it points to examples where the existing theory is flawed and is unable satisfactorily to explain representativeness and professionalisation. The thesis points to the need to develop new concepts of representativeness and professionalisation and provides a starting point for further research. Moreover, environmental groups were chosen, as they exemplify one of the most outstanding counterexamples to traditional internally democratic membership groups.

All groups are cause groups but with diverse organisational structures and strategies. The two policy areas the groups engage in are environmental policies affected by climate change, a global phenomenon requiring EU-wide and global strategies, as well as local action. Because climate change affects everyone on every level across national borders, it is
of interest to any group active in the climate change related topics of water scarcity and emission reductions, regardless what organisational or geographical level. Moreover, the international dimension of environmental policy makes the supranational structure of the EU as well as advocacy groups active at supranational level increasingly important. About 80 per cent of environmental policy in the EU is decided at EU level.\textsuperscript{54} It therefore exemplifies a perfect case to investigate how EU level groups form positions, given that sub-EU organisational levels should have a vested interest in the shaping of EU-policies. Additionally, it is perfect for showcasing the professionalisation in online technologies creating necessary transnational linkages on a global issue.

The issue of climate change is complex and of relevance from a number of different perspectives. Water scarcity and drought are highly sensitive issues which are of great importance to member states as well as a wide range of public and private stakeholders, due to its potentially severe economic and social impact. Water scarcity affects agriculture, industry, energy, transport and tourism as well as local communities and private households and eventually entire eco-systems and is a security and health hazard. Water is arguably the most important resource for a human being. Because of the special physical and social characteristics of the environment in general, and water quantity in particular, and the broad number of interested and affected parties, the participatory approach is suggested to be especially effective in order to accommodate these characteristics and interests. Water management demands broad consultation, because it requires very scientific and technical knowledge, for example for assessment processes and evaluating solutions. There tend to be wrong or unrealistic conceptions for example about water usage, its availability and consumption in the public, or simply a lack of awareness.

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\textsuperscript{54} WWF-EPO website (accessed 20/08/2012: http://www.wwf.eu/about_us/eu_environment/).
Interest groups are valuable in providing technical information, information on local state-of-the-art and needs as well as creating awareness and framing issues. Water is a subject requiring EU and indeed international legislation because water scarcity and droughts happen across boundaries and their causes and preventive measures require common transnational effort to achieve effective results. Because of this, modern water management in the EU is also designed and implemented along hydraulic units rather than national territories. The green paper on emission reductions is equally of relevance to industry, business, agriculture and energy sectors and local communities. Since it affects the energy mix and the structure of energy consumption, it eventually has an impact on any household or private and public organisation and moreover impacts foreign and security policy. The emissions reduction policy is a European strategy in communication with UN climate talks and connected to the global aims of the United Nations Framework Convention on Climate Change (UNFCCC). The EU is thus a policy actor participating in global negotiations as well as legislating within EU boundaries. Emissions may be pumped into the air of one country, but the resulting effects of climate change are global. Equally, the efforts of one country will only really have a weight in collaboration with others. This emphasises the need for transnational consultation, as well as networking amongst environmental groups on the issue. The emissions reductions policy requires not only broad consultation of the various sectors impacted. It also calls for economic, scientific and technical analysis and local experience input reporting on solutions and their potential.

Environmental politics or rather ‘green’ politics moreover is of particular interest in the frame of the wider democratic deficit debate surrounding the EU and the European Commission. Green politics has become increasingly prominent with EU institutions as a means of

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55 The Eurobarometer on water gives data on the awareness of water-related problems (TNS Opinion and Social 2012).
providing legitimacy through green reputation in the eyes of European citizens and internationally and is moreover providing an image of identification for citizens. This explains the particular interest in an engagement with advocacy groups, notably environmental groups. The increasing importance of green politics is also reflected in the number of environmental EU groups and other stakeholders, including European Parliamentarians who joined the ‘spring alliance’, which describes itself as “a participatory movement to ensure that the European Union puts people and planet first.”\(^56\)

In 2010, the growing awareness of the urgency of climate change led the Commission to set up the Directorate-General Climate Action. The latter “[…] now proposes policy and represents the EU in the international negotiations, while DG Environment concentrates on ensuring that relevant environmental aspects like soil, forests and biodiversity are factored into climate policy.”\(^57\)

Interesting for the study of cause groups is the fact that the EU Directorate General for Environment was set-up in 1973 with a surrogate and gyroscopic goal: “to protect, preserve and improve the environment for present and future generations”.\(^58\)

This thesis applied the decisional method used in case studies on strategies in order to identify information on key organisations, leadership, officials and their interaction: participants in climate, water and forestry policy-making related stakeholder dialogues and consultations were retrieved from official EU documents, the EU Bulletin and EU institutions websites such as DG Environment; moreover from sources such as *Agence Europe* and related academic literature. Additionally, information on stakeholders was found on the EU lobby register and group websites as well as through mapping existing environmental networks of groups such as the Green 10 at EU, national and sub-national level and through secondary

\(^{56}\) The European Spring Alliance (accessed 01/07/2012: http://springalliance.eu/).


literature. Interviews have been carried out with EU and national decision-makers and with group leadership at EU level and member organisations at national and sub-national level in the UK and Germany. To identify which groups are relevant to the case studies, in other words which groups have an interest in the policies, a keyword search was carried out on the lobby register, member groups of the EU groups were investigated with regards to the interests they represent and minutes and documents on EU stakeholder meetings were scanned. A mixture of decisional, positional, reputational, and relational methods used in case studies of network structures were applied to identify member and supporter organisations with an interest in the specific case thesis policies (Knoke 1993, 30): Sources of information were member and supporter lists, position papers and minutes as well as interviews discovering further member organisations with an interest and/or that were involved. After creating a list of the EU groups involved at EU level, interviews gave an insight into which participating groups at the internal organisational levels had an interest in the policies and how they were represented in the position brought forward to the Commission. This includes what groups’ base their position on (acceptability) and how support was expressed by member groups, but also their members and supporters in turn (acceptance). 45 interviews were carried out in total, which though this is a qualitative study, provides a lot of comparative data and complex insight. The focus was however on the five EU environmental groups of the case studies and their member groups interviewed. The focus on these five groups in particular was strategic, to include groups of different organisational structures and strategies. The selection was further dictated by the availabilities of EU and member groups’ to be interviewed during the period of fieldwork.

Two aspects were investigated to test the impact recognition, or rather professionalisation, may have on group’s ability to be representative of their members: the criteria and scope of professionalisation and the formal, informal, active and passive mechanisms of representation within
groups. These gave insights about what groups based the formation of their positions on and what channels of acceptance groups made available – hence how their representativeness could be judged. What types and degree of representativeness and professionalisation can be found in groups was established in chapter one and two. How groups’ representativeness is assessed was established also in that chapter. The case studies test under which conditions (scope and type) of professionalisation (variance), groups have which type and degree of representativeness.

To test representativeness (see table 1), the indicators for the two representativeness dimensions were developed from recent studies on political party representation (Mansbridge 2003) as well as advocacy group representation (Halpin 2006; O’Neill 2001) (see chapter two).

Traditional professionalisation criteria established in chapter two are based on professionalisation and bureaucratisation criticism in the traditional group literature (Kohler-Koch 2010; Michels 1911; Offe 1984; Sudbery 2003; Warleigh 2001), organisational theory (Egeberg 2001) as well as on professionalisation in new media technology discussed in communication and media studies (Castells 2001; Pickerill 2003).

For the water policy case an interview was conducted in DG Environment with the former team leader on water scarcity and draughts, now active on water adaptation and climate change. Secretary Generals of two EU groups involved in water scarcity and droughts stakeholder meetings were interviewed: BirdLife Europe and the WWF European Policy Office (WWF-EPO). Their national group members in Germany Naturschutzverband Deutschland (NABU) and WWF Germany and in the UK, The Royal Society for the Protection of Birds (RSPB) and WWF UK, were interviewed. Additionally, member groups of the European Environment Bureau, also active on the water issue, were interviewed to get additional data on the groups in question and perceptions of representativeness and professionalisation in the environmental group sector. Member groups
were interviewed in the UK and in Germany, for practical reasons (language and expenses), but also to enrich the diversity of groups interviewed. The two countries have inherently different government structures and cultures, often reflected in the structures of advocacy groups. For Germany they were: Bundesverband Bürgerinitiativen Umweltschutz e.V., Bund für Umwelt und Naturschutz Deutschland (BUND – Friends of the Earth Germany), Deutsche Umwelthilfe e.V., Deutscher Naturschutzbund (DNR), Grüne Liga. For the UK they were: Campaign to protect rural England (CPRE), FoE England, Wales and Northern Ireland (FoE-EWNI), Scottish Environment Link (LINK), Wildlife and Countryside Link. In addition, the UK non-profit consultancy Waterwise was interviewed to receive further information about the policy and the group sector.

For the emissions reductions policy three EU decision-makers were interviewed who acted/are acting as core figures in the policy field. Two in DG Clima (a head of unit in the Directorate for European and international carbon markets and a policy officer for the economic assessment of climate policies) as well as the deputy head of cabinet in the cabinet of the environment Commissioner Potočnik. Interviews were conducted with the Secretary Generals of three EU groups involved in meeting on the policy: Greenpeace EU, the Climate Action Network Europe (CAN-E) and Friends of the Earth Europe (FoEE). National member groups interviewed in Germany were Greenpeace Germany, Forum für Umwelt und Entwicklung (FUE) and Deutscher Naturschutz Ring (DNR), Germanwatch, WEED, Bund für Umwelt und Naturschutz Deutschland (BUND) and in the UK groups interviewed were Greenpeace, Sandbag, the Campaign for the Protection of Rural England (CPRE) and Friends of the Earth England, Wales and Northern Ireland (FoE-EWNI).

To receive further information on groups, regulations and the perception of professionalisation and representativeness by Commission officials, the policy officer responsible for NGO liaison and the funding scheme Life+, as well as five further officials in DG Clima, Environment and
Agriculture were interviewed. For a further independent group/consultancy perspective on the two core conceptions of the thesis, a European consultancy for non-governmental organisations was interviewed.

The aim of the empirical investigation was not to carry out an in-depth analysis of precisely how representative and professional environmental groups are. Rather, the aim was to explore the representativeness and professionalisation of a number of groups in order to illuminate the gaps in the literature. This meant investigating how well the literature explained representativeness by comparing organisational structures and practices against theoretical assumptions. The emphasis is therefore often on what groups base their positions on and whom they intend to represent, which entailed analysing the documents and websites on formal decision-making structures and missions (i.e. statutes, annual reports and mission statements). Interviews were then used to inquire further about informal channels of decision-making and communication (i.e. emails, mailing-lists and intranet). Importantly, a large number of background interviews with a variety of environmental groups, an advocacy group consultancy and Commission officials were able to get a sense of the acceptance dimension of representativeness. By giving examples of representativeness and professionalisation that go beyond the traditional assumptions of member representation and bureaucratisation, the thesis points to the need for further research in the field.

What the thesis does not to

This research does not argue for a dismissal of the traditional concept of representativeness based on democratic participation, nor does it argue that the acceptance dimension on its own is sufficient. What it does do is suggest it is problematic to solely apply the traditional concept to the varying types of groups with their different organisational structures and strategies, including types of members and supporters, interests and aims.
Groups have diverse representative claims, with regards to what or whom they represent and how they represent. Hence the concept of representativeness has to be adapted to these differing empirical conditions.

This thesis puts forward progressive conceptions of representativeness and professionalisation. It does not deny the continuous danger of co-optation and bureaucratisation also to modern forms of advocacy organisations. Nor does it glorify the potential and actual use of new media technologies in advocacy groups as mechanisms to achieve representativeness. Further it does not attempt to make any normative claims about groups’ democratic agency as such, though of course the behavioural dimension of groups has normative implications. Rather, it is a positive theory challenging the assumption that groups becoming more and more professional are losing representativeness, which in turn is considered to affect their democratic agency.

This thesis also does not analyse the representativeness in terms of the wider group population. This thesis responds to claims in the literature that professionalisation takes place at the cost of representativeness, because there is an estrangement between the leadership and its members. To assess this claim the multilevel representativeness of the internal organisation of groups is analysed. It provides the structural and strategic analysis of (vertical) representativeness within groups. The thesis does not try to explain whether these groups engage the individual citizen or if the (recognised) group population as a whole is representative for the population (horizontal/system perspective). Nevertheless, the analysis of group internal organisation and representativeness undertaken in this thesis is of crucial importance to the overall representativeness of the group population.

Likewise, individual members and supporters of groups have not been included in this research. This is because the context of the research question, whether or not groups can be representative despite - or because
of - professionalisation, is set in the EU context. The criticism is precisely that EU groups professionalise and do no longer represent their member groups. Though criticism in the literature that advocacy groups are generally becoming a certain type of professionalised supporter, solidarity or campaign organisation and no longer represent individuals is taken into account, it does not concern this research question immediately. Instead, this thesis wants to test whether the recognition at the additional political level, and hence a professionalisation of EU level groups, goes hand in hand with moving away from national and sub-national member/supporter group interests. EU groups do not have individual members and supporters and hence the thesis investigates member and supporter groups at national and sub-national levels rather than individual members. It would however be interesting and revealing to investigate further whether national/sub-national groups are representative of individual members/supporters. This would require a larger individual member/supporter survey and would have to overcome the difficulty of the need to cooperate with groups to provide access to members/supporters, let alone accessing confidential member and supporter data.
5 Introduction to the case studies: EU policies and environmental groups

Chapter one explained how one important strand of the interest group literature considers the Commission’s strategy to enhance its democratic credentials through the engagement with advocacy groups to be doomed. According to the argument, groups disconnect from their members and supporters as they engage in institutionalised dialogue and as a result lose their representativeness (Kohler-Koch 2008; 2010, 111; Warleigh 2001). Chapter two challenged this assumption, suggesting that advocacy groups perform different types of representation and have more complex channels of expressing support. Moreover, their professionalisation also includes an increased application of new media technologies for representation structures and strategies. The assumption that groups necessarily lose their representativeness as a result of professionalisation has to be revisited taking into account the diverse organisational structures and strategies and considering the two dimensions of representativeness established in chapter two and three.

The thesis attempts to illustrate the gaps in the literature through the analysis of interviews, documents and websites in the examples of five EU environmental groups and some of their member groups in two policy cases. The following chapter provides background information on these groups and cases to give an overview of who the groups are and in what type of policy environment they are active in. Based on this information the specific case studies will analyse the representativeness of the groups using the typologies and assumptions established in chapter two and three.

The case studies do not attempt to investigate how groups campaign, but rather what groups’ base their representative claims on and how their
representativeness is constituted, as well as what role new media professionalisation plays in the course of it. The case studies attempt to test whether group professionalisation necessarily comes at the cost of representativeness.

**The climate change policies**

The two policy areas the groups engage in are environmental policies affected by climate change, a global phenomenon requiring EU-wide, indeed global, strategies and local action. Because climate change affects everyone on every level across national borders, it is of interest to any group active on the topic of water scarcity and emission reductions, which are related to climate change regardless of what organisational or geographical level. Moreover, the international dimension of environmental policy makes the supranational structure of the EU, as well as advocacy groups, active at supranational level increasingly important. About 80 per cent of environmental policy in the EU is decided at EU level. It therefore exemplifies a perfect case to investigate how EU level groups form positions and how these are accepted, given that sub-EU organisational levels should have a vested interest in the shaping of EU-policies. Additionally, it is perfect for showcasing the professionalisation in online technologies creating necessary transnational linkages on a global issue.

**The EU Water Scarcity and Droughts policy**

Over the last decade the politics of water have changed. Historically, water management has been managed locally, however modern water management is no longer defined to national borders but to entire hydrological units that can either be within one country or across national

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59 WWF-EPO website (accessed 20/08/2012: http://www.wwf.eu/about_us/eu_environment/).

60 The area of water policy has been marked by distinct national differences in the theory of water pollution, policy tools and effective compliance with EU water law. Countries have experienced great difficulties in the integration of EU law into national regulations. Environmentalists are strong players at EU level in comparison to UK environmentalists (Richardson 1996).
boundaries, including territory outside the EU. This river basin approach also marks a trend towards more adaptive, sustainable water management that aims to take into account environmental, economic, technological institutional and cultural characteristics of an entire hydrological ecosystem. Water is no longer treated as a commodity, but as a natural resource. This change in perception provides a stronger ground and opportunity for environmental groups to push for social and ecological awareness in water policies, but also requires cross-national coordination of policies and implementation by the groups.

The Water Framework Directive from 2000 and the related River Basin Management Plans are the main regulations marking this change. However, a number of EU member states raised concerns that the directive does not propose adequate strategies to address water scarcity and droughts and requested the initiation of EU action on water scarcity and droughts. The fact that not only Southern, but also Northern member states experience droughts and water scarcity situations raised the pressure for specific regulations and encouraged additional actions by the Commission such as the drought management plan, a working group on water scarcity and droughts, mainly for national governments, and the commissioning of studies on water saving potential by the EU. In 2006 and early 2007 DG Environment carried out an in-depth assessment of water scarcity and droughts in the EU. Following the assessment, the Commission presented a set of available policy options to achieve water efficiency and water savings in its Communication to the European Parliament and the Council (European Commission 2007). In the frame of its preparation, it summoned and chaired a stakeholder forum on water scarcity and droughts to discuss the status-quo of water scarcity and droughts as well as possible solutions and contributions from stakeholders, to which also advocacy groups were invited. Two stakeholder meetings were held in

61 Thus request was raised at the Environment Council of 9 March 2006.
62 For example in the summer of 2003 most countries in central-western Europe were affected by drought and in 2005 Portugal and Spain were severely struck by drought.
Brussels about the development of the water scarcity and droughts policy and one meeting in 2010 to discuss progress against that policy. Three follow-up reports in 2008, 2009 and 2010 document the implementation process of the water scarcity and droughts policy. ‘NGOs’ and ‘civil society’ are mentioned as important players in the implementation of water policies and in particular in raising awareness and creating a water saving culture in the EU. The Commission subsequently (January 2011) and as part of the preparations for the 2012 Water Scarcity and Droughts Policy Review wished to establish a more formal and permanent group to meet more regularly on water scarcity (WWF-EPO and BirdLife officials 2010/11).

DG Environment, in particular the water unit, consulted stakeholders to get input on the status quo, solutions and orientations. Amongst the stakeholders present were three environmental groups, the World Wildlife Fund (WWF), BirdLife and the European Environmental Bureau (EEB).63 All three environmental groups are members of the Green 10, the EU environmental umbrella network recognized by the Commission as the sectoral group representative. Information on who selects and election criteria is not apparent in official documentation, however according to an insider it is the Commission’s Director Generals, Directors or Head of Units responsible for the particular policy who invite stakeholders to attend meetings.64 Environmental advocacy groups report that amongst each other there is no formal decision on who can or cannot attend, but that attendance of stakeholder meetings depends on groups’ willingness and ability to attend and provide resources. However, there are formal conditions for any advocacy group to be able to attend stakeholder meetings, requiring expertise and representativeness. For example to be

63 Further stakeholders present at the first stakeholder forum on water scarcity and droughts were officials of DG Environment, DG Research, DG Agriculture and the Joint Research Centre, a representative from the Committee of Permanent Representatives, national environmental, ecological and water management ministers, regional (sub-national) governments, national public water authorities and agencies, the European Environmental Agency and national research institutes, business (employer) associations and industry, the farmers and agricultural trade union and a European foundation on water.
64 This information stems from a questions and answer session with a Brussels based lobby agency in July 2010.
admitted to contribute to the common implementation strategy, described by one of the groups as “kind of an idea of a modified comitology process that is in charge of the Water Framework Directive” (interviews 2010/11), groups have to have a proven track record of experience in the issue area to prove they could add value to EU policies and discussions. The second condition is that the group has to represent several organisations within the EU member states.

The Communication on Greenhouse Gas Emission Reductions beyond 20 per cent

In 2005 the EU adopted the goal to reduce greenhouse gas emissions in order to limit global warming to below two degrees above pre-industrial level. In March 2007 the EU’s leaders endorsed a climate and energy policy package that aimed to combat climate change whilst strengthening the EU’s energy security as well as competitiveness. This integrated approach commits Europe to transforming itself into a ‘highly energy-efficient, low carbon economy’. The Commission's communication views the EU as a crucial player to spark movements towards global emission reductions and as a leader in the global combat against climate change (European Commission 2010, 3), setting “an example to the rest of the world” (DG Clima 2010, 1).

The first step of this approach was the agreement of the 20-20-20 targets, including a reduction in EU greenhouse gas emissions of at least 20 per cent below 1990 levels. Amongst the strategies for emissions reductions are: the European Emissions Trading Scheme (ETS), the increase of the collective renewables share to 20 per cent of the EU energy mix and the use of carbon capture and storage (CCS). The ultimate aim is cuts of 80-95 per cent by 2050 by all developed countries. At the global level, the UN Conference on Climate Change in Copenhagen in December 2009 was unsuccessful in securing binding commitments to reach the 2 degrees target. Since then, Germany, France and the UK have stepped forward
pushing for a 30 per cent reduction, “on condition that other major emitting countries in the developed and developing worlds commit to do their fair share under a global climate agreement. United Nations negotiations on such an agreement are ongoing.” In that context, in May 2010, the European Commission published the communication ‘Analysis of options to move beyond 20 per cent greenhouse gas emission reductions and assessing the risk of carbon leakage’, which, rather than deciding on which reduction level to go for, revisits the analysis of the implications of the 20 per cent and 30 per cent targets and assesses the risk of carbon leakage. The background for revisiting the analysis is that the financial and economic crisis, since the endorsement of the climate and energy policy package in 2007, changed the grounds and figures of the original analysis. The slower growth of the economy meant fewer emissions, thus an easier and less costly achievement of the 20 per cent than anticipated in 2008, but at the same time it took away the necessary drive towards the development of green technologies. This in turn risks making the long-term achievement of 80-95 per cent by 2050 more difficult and more costly. Therefore, the Commission carried out an analysis of both the 20 per cent and 30 per cent greenhouse gas emission reduction options to compare the technological, financial, economic and political implications of both scenarios. Whilst pointing out the costs of sticking to the 20 per cent target, the report also observes that the international context is not ready for a move to 30 per cent and that the EU’s economic situation places a constraint on what is economically and financially achievable (European Commission 2010). The Communication was followed by a detailed technical analysis published in February 2012 (European Commission 2012, 5). Both, the communication and the analysis contained in its Staff Working Documents have been forwarded to the Council, European Parliament, Committee of the Regions and Economic and Social Committee to inform their discussions on a potential move to a 30 per cent greenhouse gas
emission reduction target. Meanwhile, the Commission has announced plans for further analysis in the light of the international negotiations. The emission reduction objectives further had to be submitted to the UNFCCC Secretariat by the EU and other parties by May 2012 in order to prepare for a second commitment period under the Kyoto Protocol. To that purpose the Commission published another Staff Working Document (European Commission 2012, 18) providing technical input for discussions with Member States.

The communication on emission reductions is equally of relevance to industry, business and local communities and since it affects the energy mix and the structure of energy consumption, it eventually has an impact on every household or private and public organisation and moreover impacts foreign and security policy. A stakeholder consultation on the climate and energy package took place more broadly and stakeholder meetings around the implementation of the climate and energy package are held. There was no stakeholder meeting on the 30 per cent reduction issue specifically, although a stakeholder form was available for groups to be filled out (environmental groups 2010/11).

The creation of the Commission’s Directorate General for Climate and the release of the communication by the new Climate Commissioner, Connie Hedegaard, on the benefits, both environmental and economic, of the EU moving to a 30 per cent emission reduction target encouraged environmental groups. The communication was received as a positive change by many EU environmental and climate change groups, providing a good analysis and basis for debate. Further, a number of big corporations are now in favour of a 30 per cent reduction target, strengthening the environmental groups’ stance (Sandbag official 2011). After Copenhagen, the climate change think tank, Sandbag, led a coalition of 21 environmental

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and climate change groups, including WWF and UNICEF, to support a 30 per cent target or more. At the same time, the European Alliance for Competitive Industry put out a letter stating that they could not go to 30 per cent, because it would be too punishing to industry. The Corporate Leaders Group on Climate Change published an important response saying a 30 per cent target was indeed possible. The Sandbag coalition sent a letter to the European Council president Van Rompuy and the European Commission president, Barroso, and furthermore signed an online petition together, in order to get various advocacy groups to push for 30 per cent or more. Also at the same time, the UK, Germany and France stepped forward in support of a 30 per cent target. This sequence of incidents together gave environmental and climate change advocacy groups momentum in their push for more ambitious emission reduction targets (Sandbag official 2011).

The reasons for environmental and climate groups advocating emission reductions beyond 20 per cent generally follow a similar line of argument, with varying emphasis on justice, environmental or economic aspects. The general reasons are exemplified by a Sandbag official (2011):

“Firstly, if we don’t increase our ambition, we are not really staying true to the recommendations of the IPCC for the kind of commitment that is expected of a developed nation. Secondly, Europe is one of the largest emitters historically. If we pride ourselves on being leaders on climate change we need to practise what we preach. Thus environmental responsibility and Europe’s credibility are at stake. To be a leader in new low carbon economy you need to start driving action now […] low carbon jobs, green jobs. I don’t believe there will be a carbon economy, if we do not have higher ambitions.”

Forming positions in the interest of the environment based on scientific studies (gyroscopic), requires groups either to be professional and
have the expertise to carry out reliable and sound studies themselves, or to rely on scientific studies published by others generally accepted as sound. In the case of the emission reductions communication, the scientific ground around which groups formed their positions is accepted under international law. This makes their positions a strong and legitimate case on behalf of the environment and the general public, including future generations (surrogate). It thus strengthens their acceptability dimension and ‘representative claim’. The gyroscopic argument is that the scientific consensus over the International Panel for Climate Change report, or what groups understand the scientific consensus to be, dictates what are the threats, the scale of action needed and the pace. Member groups take these same studies as basis for their positions and support of the EU position (environmental group officials 2010/11). In the case of emission reductions groups rely on the UN climate convention ratified by almost all nations of the world, with its central article two stating that dangerous climate change has to be avoided. The EU target of a 20 per cent reduction is in violation of article two. Additionally, EU groups and their member groups interviewed argued that the EU has to take a lead with a high target, as set out in its own policy communication, in order to stimulate other countries to follow. Moreover, an economic interest in raising the target has to be stimulated, because as the Commissions own studies show, it is in the interest of the EU economy to increase investment in innovative renewable technologies. The latter arguments are founded on the Commission’s and the EU groups’ own scientific and economic studies as well as their principles to take on responsibility of action.

As with any general interest advocacy group based in Brussels, all groups are registered as non-profit organisations under Belgian law, which requires a certain governance framework consisting of a general assembly and a board.
The environmental advocacy groups

The interaction between groups and the Commission as well as within and amongst the network of group members, supporters and coalitions is investigated in the cases of five EU environmental groups using the examples of recent decision-making in water policy and more specifically water scarcity and drought policies and greenhouse gas emission reduction policy. All groups are environmental cause groups but with diverse organisational structures and strategies.

WWF-European Policy Office

The WWF-European Policy Office (WWF-EPO) is the European representation of WWF International, opened in Brussels in 1989. WWF, headquartered in Switzerland, was founded in 1961 by a group of ‘scientists and advertising and public relations experts’ committed to establishing an international organisation to raise funds for conservation. The founders’ intention from the start was not to represent the people or members, but to “harness public opinion and educate the world about the necessity for conservation”. For that purpose they invented the panda brand logo: “aware of the need for a strong, recognizable symbol that would overcome all language barriers, the group agreed that the big, furry animal with her appealing, black-patched eyes, would make an excellent logo”. The conservation strategy agreed was to work, wherever possible, with existing non-governmental organisations, and base arguments “on the best scientific knowledge available”.

WWF is open to forming coalitions with business and working with government in order to further conservation goals, although the type of

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67 WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/sixties/).
68 WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/sixties/).
69 WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/sixties/).
partnership is different. Business and industry are considered a second-level community after the first community of environmental groups in Brussels, other Brussels-based advocacy groups and groups based in the member states (WWF-EPO official 2010):

“Sometimes with the NGOs there is more weight in numbers. But also we can share the burden of the tasks. Not having that many resources we can be more effective in the way we employ them. I think it’s different with businesses and industry, there the partnerships are more tactical and they have to do with increasing influence and authority in the lobbying process. If NGOs and industry can be saying the same thing that is politically much more powerful.”

From the beginning onwards, the international fund-raising was organised through setting up offices in different countries. It was the founders who launched the national member groups, which send up to two-thirds of their funds raised to WWF international, and keep the remainder to spend on conservation projects of their own choice.70

WWF International now has 24 national WWF member groups and five associated groups operating under a different name. Member groups are responsible to their own Boards and accountable to their donors. WWF International itself is accountable to national member groups, donors, and the Swiss authorities. WWF International's Board and committees are mostly made up of members from the Boards and Chief Executive Officers of the member groups. WWF moreover has programmes and representatives in many countries.71

70 The interests of a nature trust set up in 1970 are used to help cover basic administration costs of WWF International. WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/sixties/ and http://wwf.panda.org/who_we_are/history/seventies/).
71 WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/sixties/).
The science-based approach to conservation has been WWF’s strategy ever since; however WWF has undergone some changes regarding the complexity and focus of its conservation targets since its foundation. Today, rather than conserving single species with a local focus, the conservation strategy has global aims, which are: slowing climate change, reducing toxics in the environment, protecting oceans and fresh waters, stopping deforestation, and saving species. These aims require complex scientific analysis and an integrated national, regional and global approach. The change of focus also manifested itself in the name change in 1986 from ‘World Wildlife Fund’ to ‘World Wide Fund For Nature’. The strategies to raise funds and awareness and to achieve conservation have been the same all along: campaigning through various media, including the press, lobbying and working with governments, as well as working in the field.

In Europe, WWF is present in 20 countries and has over 3.5 million supporters. Worldwide, it is active in over 100 countries employing about 5000 staff with over 5 million supporters, making Europe the area with the highest density of WWF supporters. The WWF-EPO with its 41 staff notably is a relatively unique structure within WWF, because it does not have its own individual members, but it is a representative office of the WWF group network, and who in turn have members and supporters (WWF-EPO official 2010).

The members together with WWF International initiated the establishment of WWF-EPO. They decided that Brussels was of extreme importance for decision-making both for the EU but also as a global player. It was seen as important to have a European policy programme, since 80 per cent of the environmental legislation that governs the EU member

72 WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/millennium/).
states originates in Brussels. WWF decided to establish a European policy programme with a strategy board which sets the direction, has advisory responsibilities for the running of the office and oversees strategy and implementation plans, and resolves some of the controversial issues. Its decision-making structure hardly changed since its creation and the ultimate goal, “people living in harmony with nature”, has stayed the same (WWF-EPO officials 2010).

Water scarcity and droughts was identified as an extremely important issue by WWF and as one of the serious problems experienced in a number of the WWF’s priority river basins. In fact WWF’s first land purchase established the Coto Doñana National Park, an important wetland area in the Guadalquivir Delta marshes. WWF is currently fighting proposals to drain the marshes and syphon off water to irrigate agricultural land and to expand tourist facilities.75

The decision to get active on the issue at EU level came with the opportunity to address this problem and face one of WWF-EPO’s objectives through the EU process on the Water Scarcity and Droughts communication. WWF-EPO has been very active around the Water Scarcity and Droughts issue and was one of the NGO stakeholders involved in the development of the policy. It participated in the stakeholder forums and consultations organised, as well as in the work under the common implementation strategy of the working group on water scarcity and droughts. It further held bilateral meetings with the Parliament, when the Parliament was adopting its report as well as with the Commission, when some of the work was on-going on the preparation of the policy. WWF-EPO also wrote to and held bilateral meetings with the Council, though normally the Council is approached through national member groups. WWF-EPO also tracks the implementation of the Water Framework Directive. The Commission does not have administration staff of its own based in the

75 WWF International website (accessed 09/09/2012: http://wwf.panda.org/who_we_are/history/sixties/).
member states, but at the same time as the guardian of the treaty it needs to check policy implementation. Thus since the European Parliament and the Commission do not really have much say in implementation and do not have first-hand information from the ground, WWF-EPO sees its opportunity in providing that information, which may differ from the information member states provide, and bringing problems to light. The Water Scarcity and Droughts policy is still evolving and during 2011 WWF-EPO was preparing for the major 2012 policy review.

**BirdLife Europe**

The BirdLife European and Central Asian Partnership (BirdLife Europe) was established in Brussels in 1993 as the European division of BirdLife International working on European issues. It is an umbrella network of 45 national environmental conservation groups with one national member group, so-called ‘partner’, in every EU member state. BirdLife Europe is one of six Regional-division Secretariats that compose BirdLife International. According to its own record, BirdLife Europe engages more than 4,100 staff, two million individual members and supporters and tens of thousands of skilled volunteers. Together with its 45 national member groups it owns or manages more than 5,800 sites encompassing 320,000 hectares. BirdLife Europe was set up “because of the ever increasing impact that decisions taken at EU level have on nature and the environment”. Brussels staff works on the improvement of EU policy legislation according to BirdLife Internationals environment and biodiversity standards and supports the development of the European and Central Asian Partners.

BirdLife Europe’s strategy to conservation is regional, with member groups implementing the Europe Programme coordinated by BirdLife

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76 BirdLife Europe website (accessed 8/9/2012: http://www.birdlife.org/regional/europe/partnership.html) and
Europe staff, working closely with BirdLife Global Secretariat staff headquartered in the United Kingdom. BirdLife considers birds as indicators for the health of biodiversity. The BirdLife Europe Programme delivers guidelines to conserve birds and biodiversity across Europe, based on expert knowledge about the status and threats to the species.

BirdLife prepares species action plans together with conservationists, scientists, nature managers and relevant stakeholders which the European Commission adopts. They set agreed conservation objectives and a framework of actions that helps to focus the conservation efforts and limited resources on the solution of the most important problems. Species action plans provide a framework for action for international treaties, national governments and governmental agencies, NGOs and scientists. They provide an official basis for actions since they are endorsed through intergovernmental agreements.

BirdLife got involved in the Water Scarcity and Droughts policy, because its UK member group, the Royal Society for the Protection of Birds (RSPB), felt it was an important issue and BirdLife Europe office itself does not have a policy team working on it. The RSPB thus requested to represent BirdLife’s policy position at the Commission’s stakeholder meetings and consultations, acting in the name of BirdLife. Apart from the advantage of working as part of a greater coalition, national groups are required to act through European umbrella groups, because the Commission does not engage with national groups in stakeholder meetings. The RSPB is very active on Water Scarcity and Droughts issues and water more generally.

Friends of the Earth Europe

Founded in 1986, Friends of the Earth Europe (FoEE) is the European representation of Friends of the Earth International (FoEI), “the world’s [and Europe’s] largest grassroots environmental network.” 80 FoEE was established in the context of European campaigns on acid rain and the protection of tropical rainforests, under the guidance of Friends of the Earth International (FoEE Annual Review 2011, 9). FoEI was founded 1971 in Sweden by its French, Swedish, British and US members. Since, it has expanded its membership to 76 national member groups, who generally existed prior to becoming part of FoEI, with 5,000 local activist groups on every continent and over 2 million members and supporters around the world. 81 Groups are diverse and independent, but all carry the FoE name and are “united by their commitment to combine grassroots activism with international advocacy [and c]ampaigning on the basis of shared ecological and social values” (FoEI 30th anniversary, 2001).

The international scope of its strategy resembled in the name ‘Friends of the Earth’ was essential to its founders, as was a “decentralised and democratic structure that allows all member groups to participate in decision-making” 82 and gives the member groups room to “move ahead their own way.” 83 FoEI, just as FoEE, forms its positions based on science and ecological and social values with an international objective, but the structure for decision-making and experience input from the field is enabled through a participatory voting system. The formation of its international positions moreover relies on input from communities, and alliances with indigenous peoples, farmers’ movements, trade unions, human rights groups and others. 84

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FoEI’s strategy has always been to motivate people to protect the environment, but the issues and tools have expanded since its foundation. Starting out as an anti-nuclear power movement, it today spans a number of issues, such as climate change, policies that promote unsustainable consumption and production and place biodiversity protection above free trade priorities – although all are true to the original aim to create environmentally sustainable and socially just societies. This expansion is partly due to “the emergence of ever more global and social problems”. Moreover, its marketing strategies now include using big names, such as Radiohead for the European Big Ask campaign, as well as a recently established ‘Council of Patrons’, made up of prominent thinkers, activists and celebrities in support of FoEI’s campaigns.

FoEE has 30 national member groups who represent more than 2,500 local activist groups with at least 700 staff and countless volunteers. Between 2009 and 2011 more than 1,000,000 people took action in Europe, both online and on the streets (FoEE Annual Review 2011, 12). FoEE’s strategy is to build up strong local, national and EU capacity for action towards environmental justice. As the EU grew in legislative activity and in its role in global environmental, trade and agricultural decision-making, so did the number of FoEE office staff. Since its establishment with a couple of staff, Friends of the Earth Europe has grown into a large office with 30 staff engaged in campaigning, communications, fundraising, network coordination, capacity building and supporting youth activism, “capable of mobilising tens of thousands of people across Europe [...] and holding both European institutions and multinational companies accountable for their actions” (FoEE Annual Review 2011, 8 and FoEE website/about). In its own words, it campaigns “for sustainable solutions to benefit the planet, people and our future, influencing European and EU policy and raising public awareness on environmental issues” (FoEE Annual Review 2011, 2). FoEE’s aim, since its establishment, is to put “the

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environment on top of the European agenda” (FoEE Annual Review 2011, 9). According to its statement in its annual review, FoEE wants “to challenge the current model of economic and corporate globalisation, campaign for environmental and social justice and promote solutions that will help to create environmentally sustainable and socially just societies” (2011, 13). It aims to be “the people’s voice at the heart of the European Union” (FoEE Annual Review 2011, 2).

FoEE got involved in the Commission’s policy on greenhouse gas emission reductions, since climate justice and energy is one of FoEE’s six core programmes, including the EU’s climate responsibility, UN climate talks strategy, energy savings and community-based renewables.\(^\text{86}\) FoEE suggests that a 40 per cent reduction is needed by 2020 if a two-degree temperature increase is not to be exceeded. This position goes beyond the EU’s official position of 20 per cent as well as beyond the demand of some of the member states to reach 30 per cent emission reductions. FoEE is moreover sceptical towards the European Emissions Trading Scheme, part of the strategy to reduce emissions.\(^\text{87}\)

**Greenpeace EU**

Greenpeace European Unit is the European office of Greenpeace International, “an independent global campaigning organisation that acts to change attitudes and behaviour, to protect and conserve the environment and to promote peace. It comprises 28 independent national/regional offices in over 40 countries across Europe, the Americas, Africa, Asia and the Pacific, as well as a co-ordinating body, Greenpeace International”.\(^\text{88}\)

\(^\text{86}\) FoEE website (accessed 08/07/2012: http://www.foeeurope.org/about/how-we-work).
“Greenpeace speaks for 2.8 million supporters worldwide, and encourages many millions more than that to take action every day.”

Greenpeace started off with a group of “Quakers, pacifists, ecologists, journalists and hippies” on a boat trip to the island of Amchitka in the Aleutians. Their objective was to stop a second nuclear weapons test. The trip was sponsored by 16,000 people who attended their fundraising concert. Established in 1971, Greenpeace’s strategy of independence, non-violence and creative confrontation is still the same today. Greenpeace’ mission has been environmental, political and global from the start and its positions have been guided by environmental science and ethics ever since. Raising funds through people that support its mission and engaging activists to protect the environment remains its core organisational strategy.

Based in Amsterdam, Greenpeace International’s 175 staffs coordinate global Greenpeace policy and strategy. Greenpeace International helps to set up national/regional offices and also set up the EU office. It draws up combined financial forecasts and strategies for the worldwide organisation, provides fundraising support to national/regional offices, provides cost-efficient global internet technology services and Internet tools, and protects the Greenpeace trademark. The national/regional offices are independent in how they carry out the global campaign strategies set by Greenpeace International within their local context, and in seeking financial support from donors to fund their national operation.

Greenpeace is an international environmental advocacy group, which aims to represent the health of the planet, a global mission. Greenpeace groups around the world see their task in a global context, and hence Greenpeace EU likewise focuses on global work, looking at the EU as a

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89 Greenpeace EU website (18/09/2012: http://www.greenpeace.org/eu-unit/en/about/).
90 Greenpeace International website: (accessed 24/09/2012: http://www.greenpeace.org/international/en/about/history/founders/).
91 Greenpeace EU websites (18/09/2012: http://www.greenpeace.org/eu-unit/en/about/).
global player. Greenpeace EU exists firstly, because about 80 per cent of legislation in the EU is decided at EU level.\textsuperscript{92} Secondly, as a global player, EU politics require a global perspective. The EU is the biggest exporter, the second largest importer and controls 20 per cent of global trade. It is a block of countries that exports a lot of its policy mechanisms and standards abroad, for example standards of emission trading schemes used in other countries. Therefore Greenpeace aims to have certain environmental standards in the EU that can have a positive impact globally. Thirdly, the EU is a very active player in all kinds of international political fora. If Greenpeace can get the EU to speak with one voice for a position Greenpeace supports as positive for its mission, in other words for the benefit of the planet, then this united voice of the EU can make a global difference politically (Greenpeace EU official 2010).

Greenpeace EU aims to monitor and analyse EU institution’s work, expose EU policies and laws it considers deficient, and challenge EU decision-makers to implement ‘progressive solutions’. Its 15 staffs are employed mainly as policy officers, as well as some directing, managing and communication staff.\textsuperscript{93}

Greenpeace EU has been very active on the issue of greenhouse gas emission reductions and the respective EU policy. The reason Greenpeace EU became active on the policy is because cutting carbon is one of its main campaigns. Greenpeace Europe has been campaigning for the limitation of global warming to below two degrees above a pre-industrial level for many years. Moreover, from a global perspective, it is crucial that the EU takes the lead and thus takes on a higher share of global emission reductions. In order to increase pressure on the US to reduce emissions, the EU has to strengthen its cooperation with other actors outside the EU, including developing countries and emerging industrial countries. The third important reason for Greenpeace EU was a huge drop in carbon price over

\textsuperscript{92} WWF-EPO website (accessed 20/08/2012: http://www.wwf.eu/about_us/eu_environment/).

\textsuperscript{93} Greenpeace EU websites (18/09/2012: http://www.greenpeace.org/eu-unit/en/).
the last years taking away an important incentive for green technology and green and resource efficient development in the EU. At “stake is our dependency on fossil fuels, our chance to create new green jobs in Europe and of course our climate, the stability of the global climate system” (Greenpeace EU official 2010). Climate change affects everybody and is the biggest environmental problem of our time. Climate change could have a major economic impact in terms of migration, resource scarcity, water levels as well as agricultural production. The impacts are huge and affect every single European citizen. According to the Stern report 20 per cent of the global GDP would be affected. Energy is the biggest contributor to climate change and almost every single European citizen is using energy which requires a shift to green technology. For the European citizen, how the electricity is generated makes no difference as such, but of course it does make a difference for the climate and eventually comes back to the European citizen. This causality chain has to be framed and explained to the people, which Greenpeace sees as one of its roles (Greenpeace EU official 2010).

Greenpeace EU has two general emission reduction policy goals, of which one is to build a global coalition of progressive countries that can drive people towards an international climate deal. Another goal is to foster the development of green energy efficient technology in the EU. Though Greenpeace EU has not been involved in any formal processes, it has regular meetings with all Commission official levels, whether Heads of Units or Directorate Generals working in DG Climate and DG Energy, or the respective Commissioners and cabinets. In its campaign Greenpeace’s scientific and solutions-oriented strategy becomes clear:94

“Greenpeace is calling on the EU to increase its domestic climate target to 30 per cent as a first step. There are strong environmental and economic arguments for doing so. A study by

Oxford and Sorbonne Universities, among others, found that a 30 per cent target could create a net six million new European jobs by 2020. Shifting away from fossil fuels will help shield Europe’s economies from ever-unstable fuel prices. These are among the reasons why Unilever, Philips, Google and Axa are among nearly 100 major companies now calling on EU governments to support a 30 per cent climate target.”

One of the policy demands, made together with WWF, is the request for an adjustment of the Emission Trading Scheme (ETS), since, in its current state, it is threatening to worsen rather than improve the situation.95

Climate Action Network Europe

The Climate Action Network Europe (CAN-E) was established in 1989 as an umbrella network of environmental advocacy groups active on climate and energy issues. The aim was to bring the existing groups together to coordinate positions and lobby activities both in Europe but also at the international climate change negotiations. Today CAN-E is “recognised as Europe’s leading network working on climate and energy issues”,96 with 152 member groups in 25 European countries.

CAN-E is the Western European regional office of the global Climate Action Network (CAN), established in 1989 which has over 700 member groups in more than 90 countries, working to promote government, private sector and individual action to limit human-induced climate change to ecologically sustainable levels.97 The global network “is based on trust, openness and democracy”.98 CAN’s global environmental vision is:99

95 Greenpeace EU website (accessed 20/07/2012: http://www.greenpeace.org/eu-unit/en/campaigns/Climate/Cutting-carbon1/).
“a world striving actively towards and achieving the protection of the global climate in a manner that promotes equity and social justice between peoples, sustainable development of all communities, and protection of the global environment. […] CAN’s mission is to support and empower civil society organisations to influence the design and development of an effective global strategy to reduce greenhouse gas emissions and ensure its implementation at international, national and local levels […]”

The coordinating role by CAN-E entails mostly supporting its member groups offering logistical and informational support about policy and climate change. There is also an outreach element in its role in the sense that it talks to other stakeholders, such as students and researchers. But most importantly, as one CAN-E official expresses, the objective is to “represent our members to influence policy” (2010).

CAN-E has been very active around the emission reduction policy, which is one of its prime goals and main advocacy issues. CAN-E was central in coordinating EU level climate advocacy by hosting working groups, strategy sessions, press briefings and conference calls (CAN-E Report 2010, 12). CAN-E got involved in the policy, because emission reductions are a core element in the fight to avoid the dangers of climate change. According to CAN-E, 30 per cent reductions are not consistent with the two degree policy either. Its aim is convincing EU leaders to move to a 40 per cent target in the near future. However, since member states and the Commission are only considering a 30 per cent reduction that is a “difficult enough goal” (CAN-E official 2010). One interviewee made the point that success could be considered in terms of keeping the issue on the agenda and making sure that in the media not only the business side is presented but also the broader NGO side (CAN-E official 2010).

Staff interviewed considered that a number of issues are at stake. There are the consequences of not acting according to climate science on the one hand, and political consequences on the other. The international diplomatic agenda will be affected, if the EU does not raise its goals, and the opportunity for Europe to take the lead in emission reductions is at risk. Another line of argument is that the green economy and green jobs are not sufficiently incentivised without an increase in emission reduction goals. Governments and businesses are considered most affected by the policy (CAN-E official 2010).

CAN-E participated in the stakeholder consultation and also in most of the stakeholder meetings regarding the implementation of the climate and energy package and filled out the stakeholder form on the 30 per cent. This was in response to a formal invitation from the Commission. Sometimes invitations get sent directly to a person, sometimes generic to the office. In 2010, CAN-E was focussing on trying to convince EU leaders that it is indeed in their best interests, as well as the environment’s, to make the move to minus 30 per cent before Cancun, on the way toward a minus 40 per cent emissions reduction target in the near future (CAN-E Report 2010, 5). In doing its climate advocacy on the emission reductions policy, CAN-E works closely with the Green 10, of which it is a member, and also works with the EEB, its 'sister organisation' in its own words (CAN-E Report 2010, 17).

This introduction to the five EU environmental advocacy groups engaged in the two policies provides background information to set the scene for the empirical analysis of the groups’ professionalisation and representativeness in the following empirical case studies.
6 Water: WWF and BirdLife

The assumption that groups necessarily lose their representativeness as a result of professionalisation has to be revisited taking into account varying organisational structures and strategies and considering the two dimensions of representativeness established in chapter two and three.

The case study analysis is therefore divided into three parts: introduction to the groups and case, organisational structures and strategies of representation, and professionalisation. Firstly, the Commission’s water scarcity and droughts policy is introduced and EU groups engaged with the policy are presented (WWF and BirdLife). Secondly, the promissory (and anticipatory) representation structure, as assumed in the existing literature, is reviewed and compared with the predominantly gyroscopic and surrogate position formation found in the empirical examples. Moreover, the consequences of distinct organisational structures and strategies of representation for the acceptance dimension of representativeness found in the case study groups are explained. Thirdly, the assumptions of the impact of professionalisation, or bureaucratisation, on group representativeness in the existing literature are reviewed and revisited taking into account gyroscopic and surrogate representation structures. The conception of professionalisation is then extended to include new media technology and its implications for the two dimensions of representativeness. Empirical findings support the thesis that group representativeness is two-dimensional and more complex than hitherto assumed in the professionalisation and representativeness dichotomy literature. Moreover groups increasingly professionalise their new media application constituting alternative channels of support and feedback; and hence providing further potential to positively impact representativeness.
Organisational Structure and Strategy

The thesis suggests that in order to understand the representativeness of a group, it is necessary to look at its organisational structure and strategy. The following section first reviews the representation structures and strategies the literature assumes groups have, presuming that representatives’ preferences are induced by the constituency. The cases of WWF-EPO and BirdLife Europe then reveal that these environmental groups have different organisational structures and strategies of representation. They form their positions based on science, rather than on members’ votes or preferences, and member groups and supporters often express their acceptance of the position represented via means other than democratic votes or participation in governance structures. Taking into account the two dimensions of representativeness, combined with the distinct organisational structures and strategies, it becomes apparent that the evaluation of representativeness depends on and varies according to the structures and strategies of interest representation.

Forming positions

The literature on the professionalisation of EU advocacy groups assumes that professionalisation negatively affects group representativeness (on a threshold of media performance professionalisation see Frantz 2007; Frantz and Martens 2006; Saurugger 2005). One of the arguments in the literature, set out in chapter one, is that there is a lack of member and supporter participation (see Saurugger 2008 for an overview, Sudbery 2003, 87; Warleigh 2001, 2004). Moreover, institutionalisation of advocacy groups is said to lead to the centralisation and bureaucratisation of organisational structures and the creation of elite leadership remote from members and supporters, or grassroots interests (Kohler-Koch 2010, 111, Kohler-Koch 2008; Warleigh 2001). Positions put
forward by EU groups in Brussels no longer represent the interests of their member- and supportership, because members and supporters have no or little say in the formation of EU positions (Sudbery 2003, 87; Warleigh 2001).

The assumption in the literature is thus that groups form their positions based on democratic member votes or participation in organisational governance. Their positions are induced by the preferences of the members’ interests and the grassroots supporters. In other words, positions are formed to represent members’ preferences. Representatives are ‘acting for’ (Pitkin 1969) members and members cause changes in the groups’ representative behaviour (Mansbridge 2003, 521). The organisational strategy is to represent ‘humans’, since the interests represented are those of the constituency, thus of the members. The human characteristic further includes that the constituency (members) could potentially speak for themselves (Halpin 2006, 926).

The EU groups might thus put forward a “relatively unmediated version of the constituents will” (promissory representation, Mansbridge 2003, 516). The EU group is accountable to its member groups (and they in turn to their members) in the traditional principal-agent sense. EU groups have to keep their promises in order to be representative of their constituency. Or EU groups might put forward a position they predict members will agree to in hindsight (anticipatory representation, Mansbridge 2003, 517). This creates a reciprocal power relation and enables continuing mutual influence, because it leaves room for members to change their preferences and for EU groups to influence members’ preferences (2003, 517f).

In short, to be representative, the literature expects members of EU environmental groups to have a say in the governance of the group. This implies that member groups participate in EU position formation and that they internally provide for participatory structures down to the grassroots in a way that assures their opinion is reflected in EU positions. Structures of
representation would give member groups and their members in turn power over the EU groups’ representative activities. Judging representativeness is based on either the numbers of members/supporters (promissory) or the deliberative qualities of the communication between EU groups, member groups and grassroots (anticipatory).

However, positions may also be formed based on values, principles expertise or empathy. In the traditional promissory and in the anticipatory forms of representation the representatives’ preferences are induced by the constituency whilst in gyroscopic representation, the representatives’ preferences are internally determined. Neither gyroscopic nor surrogate representations require participatory position formation as promissory representation claims do.

The case studies show that groups represent environmental interests not primarily through participatory decision-making structures as assumed in the traditional literature. Groups form their positions based on gyroscopic factors such as scientific knowledge, experience and common sense among the leadership. Decision-making structures tend to be in place to make sure national and sub-national experience and expertise is considered in the position formation and to decide on the ‘how’ rather than the ‘what’. Moreover, their position formation reflects the interests of future generations and the environment, such as nature, the climate and biodiversity, and is thus a surrogate representation.

The important difference between promissory or anticipatory and gyroscopic or surrogate representation is not about whether or not member groups get involved in the formation of a policy position. It is about whether the policy position itself is based on a bottom-up issue that individual and group members have raised, or whether the need for action is based on scientific, experience and common sense factors. In other words, the promissory representation requires a democratic structure that resembles the specific needs and interests of the members themselves, whilst the gyroscopic representation primarily resembles the interest of a
cause based on scientific analysis, experience in the field and common sense, though this is of course happening in the interest of member groups and individual supporters or else they would not be supporting such a cause (acceptance dimension). Consensus or agreement structures are in place to receive agreement for proposed policies based on gyroscopic reasoning, rather than to enable democratic participation in which the interests of the base are represented at the top.

**Representation in EU environmental groups: The acceptability dimension**

The cases of WWF-EPO and BirdLife Europe below illustrate that groups do not perform promissory representation as the basis of their positions. They instead apply a mixture of representation structures, with gyroscopic and surrogate representation structures as dominating features in the two environmental groups.

**WWF- European Policy Office**

WWF-EPOs reason for being is “to stop the degradation of the planet’s natural environment and to build a future in which humans live in harmony with nature” (WWF-EPO Annual Review 2011, 28). It makes no actual claim to represent its member groups and supporters in the traditional promissory sense or rather in terms of democratic representation. Instead, when speaking on behalf of its large member and supporter base, WWF-EPO prefers to claim it “seek[s] to represent the views of” 20 million people rather than “representing 20 million members of Europe” (WWF-EPO official 2010). The representative claim is one about the cause and mission the group stands for: “we are a representation office of the WWF network vis-à-vis the European institutions on the issues that are of concern to the organisation and the mission of the organisation” (WWF-EPO official 2010).
The WWF is a science-based and solutions-oriented organisation. It represents the cause of the environment and tries to influence policy and raise awareness, by basing its policy recommendations on expert knowledge as well as its own networks experience in the field – a gyroscopic position formation. Policy details are very much based on WWF-EPO’s analysis. The WWF flagship analysis is “the living planet report”, which sums up a number of years research, showing the state of biodiversity and the state of people’s consumption overshoot. The analysis is a guideline as to which particular policy priorities to follow and where to allocate resources, in order to achieve these particular objectives. It highlights the particular areas which are either extremely urgent or where there is a huge opportunity for the WWF to make a difference. This analysis is carried out either by independent scientists who are doing their own research, or in cooperation with WWF partners, such as the Sociological Society and Global Footprint Network in the case of the living planet report.

The particular role of EPO is to support the WWF European and global network in better understanding, interacting and changing EU policy legislation. The group considers its role as “supporting the network of national members through relevant timely information and knowledge of processes […] and accessing funds is crucially important these days. We are the gatekeeper for the national networks to EU funding” (WWF-EPO officials 2010). WWF-EPO gives advice to the network of European WWF groups and guidance with regard to European policies. It moreover feeds experience and show cases from the ground into policy recommendations. This includes WWF-EPO taking results from the offices, the ‘local products and solutions’, trying to package and describe them, including socio-economic data and then making a case for these vis-à-vis decision-makers to promote and magnify some of the solutions to other areas. WWF’s specific role is showcasing possible solutions that can be developed on a larger scale in order to help reconcile the market and state. WWF-EPO aims
to clearly refine its arguments and take into account actual and potential objections from other sectors and the Commission (WWF-EPO officials 2010).

WWF-EPO’s gyroscopic representation is reflected in the structure of management and cooperation with its member network. The decision to give priority to and get active on the Water Scarcity and Droughts policy was taken in the strategy and in the implementation plan process, prepared by WWF-EPO in consultation with member groups and presented to the strategy board for approval. The WWF-EPO strategy board sets the direction, has advisory responsibilities for the running of the office, oversees strategy and implementation plans, and resolves some of the controversial issues (WWF-EPO officials 2010). The strategy board meets 2-3 times per year, headed by a rotating chair, and is made up by conservation directors from seven of the 22 European WWF offices\(^{100}\), plus WWF International. They are “the shareholders on behalf of WWF that make sure that [WWF-EPO] is delivering on the objectives that WWF has set for itself” (WWF-EPO official 2010). However, the strategy board does not have formal decision-making power. It is WWF International together with four individual members, who take formal decisions as the annual General Assembly, and who are accountable for the proper and transparent administration and functioning of the office. The General Assembly also elects the members of a Management Board and its officials\(^{101}\), and in practice has the same membership as the General Assembly with one member less. The Management Board approves the budget and annual accounts, the work programme and activity report and appoints the Secretary General (WWF-EPO officials 2010 and website). During the development of the strategy plan WWF-EPO further sought advice of

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\(^{100}\) In 2012 these were WWF Sweden, France, Denmark, Netherlands, Germany, United Kingdom and the Danube-Carpathian office in Austria (accessed 18/5/2012: http://www.wwf.eu/about_us/governance/).

\(^{101}\) The WWF-EPO Management Board officials are president, vice-president(s) and treasurer.
people in the Commission, the cabinet, business industry and of other Brussels advocacy groups.

The internal planning meetings go through a prioritisation exercise, several big opportunities are identified, but limited resources require the selection of the most pressing issues. WWF-EPO in communication with its internal network, that is the directors of national offices and the policy network, scores which particular issues to concentrate on more, and which ones to drop. Priorities are given based on various criteria and selected issues are shaped into a work plan for that particular year, identifying clear deliverables that have to be achieved by the end of the year; for example the mining waste directive was dropped off the list, but water scarcity and droughts was seen as an extremely important priority for a number of the WWF offices WWF-EPO is working with, thus it was decided to allocate resources to it.

WWF-EPO got active on the Water Scarcity and Droughts policy, because of the effects water scarcity and droughts have on the ecosystem and eventually people’s livelihoods. These effects WWF determined through scientific research and first-hand experience in its own projects and programmes. The key goal of the Water Scarcity and Droughts policy for WWF-EPO is to promote the demand management rather than constantly increasing the supply, as well as to establish environmental flows, one of the key determinants of ecology. WWF-EPO wanted to assure that the water scarcity and droughts regimes achieved a proper implementation of the Water Framework Directive through promoting water efficiency by using water pricing as a tool. In the EU a significant amount of territory is affected by water scarcity. Water scarcity is something that can be managed and is not a natural phenomenon. It means available water is completely overused, rivers dry up and do not meet the sea anymore, groundwater levels fall, sea penetrates and pollutes the groundwater further and wetlands dry up. As a WWF-EPO official explains, there are clear impacts water scarcity has, and these impacts are
clearly linked to people’s livelihoods, to impacts on biodiversity, loss of ecosystems and ecosystem functions’ functions. At stake are peoples’ lives: nobody can survive without water and it is fundamental to get that balance right. Water is the basis of peoples’ lives, society and the economy. Water is needed for practically everything, from growing food, making clothes, over the computer people work on, to the bicycle people ride. On the other hand, the ecosystem needs environmental flows, hence it needs a certain amount of water to function, especially under the water scarcity and droughts situations, where it is absolutely crucial to leave a minimal amount of water to the ecosystem that it can continue functioning (WWF-EPO official 2010).

Participation of member groups is considered crucial in order to be able to run a European network. The work on the Water Scarcity and Droughts policy is done in very close cooperation in a team with one water policy officer in Brussels and further people in the national cities, who are all contributing through advising on papers, talking to their governments or writing up case studies and showcasing practical solutions with first-hand information from the ground. To prepare for EU conferences for example, there are back-to-back team meetings with the EU water policy officer and everybody who is available from the network. Work on the national level and in the WWF priority river basins is taken as a basis for WWF policy recommendations and policy tasks. WWF-EPO with its network tries to find the common position between all the offices, using examples from everywhere to package it as a WWF position towards the Commission and other decision-makers. WWF-EPO officers send the position round to offices, which comment or provide project cases and knowledge. The case study information is either provided by local WWF offices themselves who have prepared a report or else WWF-EPO works closely with them to prepare it. In the case of water scarcity and droughts, one of the key WWF programmes is Coto Doñana in Spain where the situation has been quite acute for a number of years. For example, through its campaigning against
the national Spanish hydrological plan as an example of pure supply side, the WWF developed alternatives to achieve the same level of economic development and economic activities whilst retaining the health of the ecosystems. The report developed by WWF Spain and their experience and provision of specific practical data for water saving technology and potential formed the basis for some of EPO’s thinking.102 The Coto Doñana wetlands in Spain is a project where WWF is trying to develop a plan that ideally creates a win-win situation for local agriculture, supermarkets, the ecosystem and cultural and religious demands. WWF works both with farmers and supermarkets to help save the Doñana wetlands through irrigation, helping to reduce the water used in the national park. By showing what can be done and showing the benefits to the EU, WWF tries to influence some of the major policy recommendations and how the Commission deals with member states through the Water Scarcity and Droughts policy subsequently.

In bilateral meetings with EU bodies it is usually the WWF-EPO staff attending, but on occasions of conflicting appointments, or if someone with experience from a national group is needed, a national group expert will attend: for example a national group expert involved in improving irrigation efficiency projects. After meetings the WWF-EPO water policy officer reports to his policy network, highlighting action points, referencing to presentations and discussing points with the reference group. In response to the Commission consultation, the WWF-EPO water policy officer submitted the Water Scarcity and Droughts position paper on behalf of WWF as a whole, after the paper had gone through consultations with national offices.

At the same time, WWF is fundamentally based on surrogate representation, expressed in its understanding of its role in “giving a voice to nature in the European Union” (Annual Report 2010: 28). WWF-EPO also

102 The Spanish WWF project was in fact funded by the EU life+ funds.
expresses that it represents civil society or more precisely the civil society sector (WWF-EPO official 2010). This sector does not really have a voice and is often not really part of discussions and sometimes silent in meetings of the Commission attended by representatives of various industries or agriculture.

“The actual biodiversity discourse for example, or the Sturgeon or the carp are not really part of the discussions and sometimes the role of WWF-EPO is to bring the concerns of the silent sector to the discussion paper” (WWF-EPO official 2010).

This aim reflects the representation of important perspectives of society or rather the environment in the political domain, which are otherwise neglected. This surrogate representation, where positions are formed based on empathy, is a core role not only of WWF-EPO, but WWF internationally and is the driver behind its activities.

**BirdLife Europe**

BirdLife International, according to its slogan, is “working together for birds and people” or “nature and people” (BirdLife Europe Annual Report 2011, 2). BirdLife sees its role in protecting nature based on its “wisdom and knowledge about nature” (BirdLife Europe Annual Report 2011, 3). It uses scientific data as basis for policy positions and employs professional staff to identify threats to the environment and develop solutions, but also works in cooperation with volunteers and national member group staff in a “local to global approach” to get local input of experience and data (BirdLife Europe Annual Report 2011, 3). BirdLife’s role is not representing members as such, but “a cause which is voiced by [its] members” (BirdLife official 2010). Success for BirdLife is “changing policy for the better” (BirdLife official 2010) and “preserve the beauty of nature” (BirdLife Europe Annual Report 2011, 3). In general for the group this is halting the loss of biodiversity, using birds as indicators based on research by BirdLife’s
scientific team. Overall policy goals are thus guided by the group’s principles, based on expertise and member group experience.

Moreover, BirdLife represents the interest of biodiversity and birds that have no voice, and also the interests beyond its member groups and their supporters in turn. This is a claim for surrogate representation.

The position formation on the Water Scarcity and Droughts policy worked slightly differently with regard to issues that the BirdLife Europe office has set up task forces and staff to work on. There is no BirdLife task force on water and thus the position formation and representation towards the European Commission was led by its national member group, the RSPB, active on and interested in the issue. BirdLife’s position on the Water Scarcity and Droughts policy was formed primarily by the RSPB based on scientific research (including BirdLife’s reports), knowledge on the ground and in consultation with interested BirdLife member groups, who were asked to provide input of their knowledge and experience on the ground.

The scientific motivation for the RSPB water scarcity and droughts position is reflected in its policy goals and the potential threat the group sees for the environment and the people living in it, if specific steps are not taken. The general Water Scarcity and Droughts policy goals for the RSPB are to safeguard the most important bird habitats across Europe, many of which are threatened by water management in one form or another, in particular by strategies of countries to combat water scarcity and droughts. The RSPB, for example, sees great potential risks to some of Europe’s most important wetlands. There are potential risks through future strategies such as water transfers or major dam building, damming head waters of rivers and changing the wild, which would hit a number of Europe’s most important terrestrial habitats as well. According to the RSPB risks are already apparent from existing poor water management such as water extraction as well as the strategic government’s responses to deal with this poor water management. The reason why the RSPB got engaged on the Water Scarcity and Droughts issue is the potential direct impact on the
environment. The key risk the RSPB associated with the policy was that particular protected area standards in the EU Water Framework Directive, where water scarcity and droughts were considered a serious issue, were weakened. Member states would be allowed widespread derogations from achieving Water Framework Directive targets, if they could claim they had water scarce areas. The Water Scarcity and Droughts policy could have allowed certain states to go ahead with major building or projects to build themselves out of a water management problem. Or the policy could have led to legitimated increases in water consumption or less of an emphasis on reducing water consumption by consumers, which would have maintained a continuous erosion of the quality of the water environment, because of the continuous and unnecessary use of excessive amounts of water (RSPB official 2010).

The RSPB also attended all stakeholder meetings in Brussels. Two meetings were about the development of the Water Scarcity and Droughts policy; one meeting in 2010 was devoted to discussing progress against that policy. Prior to going to a meeting, the RSPB informed the BirdLife office that it wished to represent BirdLife. BirdLife then inquired within the network whether there were any other groups intending to do so. There was no decision on who should go to the water working group meetings, but it was a matter of willingness and ability. The RSPB either informed BirdLife informally what view it was going to put forward or, if it was a formal response, the position went through BirdLife and its membership first, as was the case with the consultation position. After meetings, feedback was provided to BirdLife. Generally, BirdLife informs member groups about the outcome of advisory meetings it attends, if it believes that it is relevant to the members. Member groups are however made aware of these stakeholder meetings and they also know that BirdLife and member groups are participating in these generally.

BirdLife Europe provided informal input as well as the communication infrastructure for the exchange of experience and expertise amongst
members in order to reach a common BirdLife position paper. The RSPB inquired through BirdLife whether any other members had raised an interest in representing BirdLife on the Water Scarcity and Droughts policy at the stakeholder meetings. This had not been the case and in a second step the respective RSPB water policy officer and the head of water policy drafted the position, which was then broadcasted to all BirdLife member groups by the Brussels office. There was little feedback, mostly from the Spanish member ‘SEO (Sociedad Española de Ornitología)/BirdLife’, and also the Portuguese member the ‘Portuguese Society for the Study of Birds’, both very concerned about water scarcity and droughts. Both did not have enough staff and resources to engage in EU water policy themselves, but they discussed their views and experiences in their specific cases with the RSPB. SEO/BirdLife for example reported on its local problems particularly with irrigation and major water transport schemes, which could be a serious issue for coastland wetlands and the Mediterranean. In support of the RSPB’s position SEO/BirdLife provided and discussed case studies and local information the RSPB could use to exemplify and diversify the BirdLife position paper. The RSPB had to inform BirdLife about the draft position it was going to submit to the Commission’s consultation and BirdLife members then had the opportunity to respond with amendments or disagree.

This is similar to the process when BirdLife staffs represent a policy issue of its core working groups. Those working groups, or ‘task forces’, are established by BirdLife Europe policy staff together with member groups in order to “exchange information and experiences, develop policy positions and coordinate advocacy activities”. BirdLife forms positions in coordination with its members and will not put a formal position paper forward to the Commission by itself or in coalition with EU-groups, if its member groups disagree. In the event of conflicts of interest, for example
with the EU food security paper, BirdLife uses personal meetings and emails to negotiate until member groups find an agreement. Or if groups do not, there is the option to leave it as a discussion paper (BirdLife official 2010). All national member directors meet annually and can choose to work in thematic groups into which they are elected and to which head of themes are elected (BirdLife official 2010). BirdLife policy positions are formed by the individual task forces who meet twice per year and communicate per mailing-list throughout the year. During the time of interviewing, the official rules on how to form policy positions were being specified. Generally the national directors determine how BirdLife’s positions get decided, thus who can initiate a position, who drafts it and how much time is needed. There is a vote on a draft, and then the final position is drafted on which groups vote again and which decides the final task force position (BirdLife Europe official 2010). Member groups can set and amend policy agendas which are sent around by BirdLife before task force meetings. Whether or not BirdLife should have a position on an issue is decided at these task force meeting and depends on the type of issue and on the perceived relevance of the issue. BirdLife Europe at times will advise to take national routes of influence rather than EU channels, if it believes that they are national or local issues (BirdLife official 2010).

The European and Central Asian Committee facilitates BirdLife’s overall compliance with the environmental and conservation goals and acts as a board. It guides and advises BirdLife Europe on behalf of the member groups and the Global Council. It approves BirdLife’s general policy lines, develops the European programme, assists BirdLife Europe in its implementation and monitors the common achievements, advises on the work plan and budget of the European division, decides on high-level European policy, reviews the development of the European Partnership, helps secure funding for the European Programme and Division operating costs, assists in communication, convenes regional partnership meetings and represents the European Region in the Global Council. About seven to
eight directors of member groups make up the committee. The directors and the chair of the Committee are appointed from amongst the member group directors for two-year terms (BirdLife official 2010).

BirdLife’s organisational structures and strategies thus combine aspects of gyroscopic and surrogate representation. The crucial indicator for the judgement of BirdLife’s acceptability dimension of representativeness is what it bases its positions on. These decisions on ‘why’ positions are formed are based on gyroscopic and surrogate factors such as BirdLife’s own scientific research and the expertise of the group and its membership. It further adheres to the group’s guidelines and common sense, also seeking advice on the relevance of certain issues for the European level from people in its Brussels circuit. The input to policy positions by member groups is considered crucial, because of their particular national and local expertise and experience in their reserves. It is for the reason of the protection of birds, biodiversity and the people that groups form positions and want BirdLife to get active on EU-issues for them. However, the process of position formation, thus the decisions on the ‘how’ of the position formation on specific policies within task forces, is participatory. Policies are always decided in consultation with member groups. “We would not do anything without the support of member groups” (BirdLife official 2010).

**Represented by EU environmental groups: The acceptance dimension**

Representation is more than ‘standing in for’. Whom or what a group represents is reflected in ‘who it is’ (WWF-EPO official 2010). What a group’s philosophy is, its mission, its organisational credibility, reputation and expertise, who it speaks on behalf of, what type of group it is, its structures (statutes), its constituency is and its historical record. These factors are also the basis of choice for member groups and individual supporters when they decide which group or campaign to support. It is
what motivates members and supporters to join or support a group. ‘Who a group is’ or a group’s image also constructs the expectations of member groups and supporters. A group’s is representativeness rests not only on how positions are formed or a considerable degree of member participation (acceptability dimension), but also on whether members and supporters accept the advocacy group as representative (acceptance dimension).

Important for the acceptance dimension is that member groups and individual supporters who sign up to a group understand how the group or campaign they support interprets “participation” and what channels of inclusion are available. Organisational structure and strategies matter and environmental groups come in various types and employ a variety of different strategies (environmental group officials 2010/11; see Pickerill 2003, 47 for an overview of the literature). Environmental groups tend to follow gyroscopic and surrogate representation because of the nature of their issue, described as “objective-driven nature of green thinking” (Dobson 2000, 122). Supporters thus will be inclined to support these types of environmental groups, because they have a similar ‘green thinking’.

This study thus suggests that representativeness is made up of two dimensions. The traditional assumption of representativeness is however concerned only with the first dimension, neglecting that ‘representative claims’ (Saward 2006) do not only have to be acceptable because of the position formation process (acceptability dimension), but they also have to be accepted as representing their interests by the members and supporters (acceptance dimension)(based on the definition of government legitimacy drawing on Kielmansegg 1971, 368; in Dingwerth 2007, 14). Acceptance requires no participation in the position formation. Although in promissory position formation voting is the main act of acceptance, acceptance can be expressed in a variety of ways.

Judging the representativeness of a group is predicated on what a group bases its position formation on (organisational strategies and
structures), which in turn affects the indicators by which the acceptance dimension can be judged. In the case of gyroscopic and surrogate representation, the acceptance dimension is separate from the acceptability dimension, and is all the more crucial for the judgement of representativeness, precisely because support from the members and supporters has not been expressed during the formation and vote on the position.

Acceptance can be directed at a group and its missions and visions in general or at specific policy positions and campaigns. The number and amount of regular subscriptions to a group, number of volunteers, amount of donations, number of ‘Facebook likes’ and Twitter followers for example indicate the general acceptance of the group’s principles and positions. Specific support can be expressed by signing offline and online petitions and campaigns, volunteering for specific issues, giving project-specific donations, taking campaign action such as writing to or ringing MPs, liking and sharing Facebook events and campaigns or tweeting about campaigns and positions.

The support by constituencies, or their acceptance of a group as well as its positions, is based on trust, organisational credibility, and reputation. Professionalism in this context is crucial in particular for gyroscopic, but also surrogate groups, because they represent claims that are rooted in expertise as well as empathy, which requires a professional understanding of the beneficiaries.

Marketing requires professionalism, but a group also has to understand the limits of media professionalisation (Frantz 2007). Groups have to be true to their mission and responsive to the views of civil society, or their credibility and reputation suffer. This vulnerability to threats to reputation serves as powerful control mechanism to keep [groups] honest” (Risse 2006, 190). Professionalism thus has to be accompanied by responsibility or accountability, in order to retain trust (CPRE official 2011).
By member groups

In umbrella networks, such as BirdLife, the expectations of member groups are different to EU groups that have members belonging to the same global organisation, such as WWF. BirdLife member groups look to it for coordination, information and outreach and choose to get actively engaged when a policy is of core interest or they have experience and data to feed into a common position. WWF has global positions and campaigns by default. National and local policies and campaigns are always in line with the broader policy strategy.

WWF- European Policy Office

WWF staff interviewed, both at EU or national level, generally speak of “WWF” meaning the whole organisation as such. This reflects the sense of being ‘one’ global organisation, with one global strategy. Interviewees were very aware of each other’s work, use of social media and surveys that had been carried out. Groups are well connected and conceive each other and each other’s work under one coordinated objective. This is extremely relevant for the acceptance dimension, as it expresses the acceptance national member groups have for WWF-EPO’s advocacy. There is awareness and clarity about what each level does, and this forms the basis for support for the general, but also policy specific, advocacy and campaigning (WWF officials 2010/11).

The fact that WWF-EPOs representativeness is based on surrogate and gyroscopic representation also forms the basis for the acceptance of their representative claim by member groups, supporters and beyond.

Member groups are considered important and their views are incorporated into the policy positions. Member groups form part of the policy formation processes, delivering crucial experience from the ground and at times carrying out research often in cooperation with other institutions. The decisions WWF-EPO takes and the issues it works on are of concern to the groups and the mission of the group. Decisions go through
very rigorous consultation and agreement with WWF programmes and offices. For the Water Scarcity and Droughts policy for example, the largest part of the time and resources was invested in communication with member groups and media, closely followed by lobbying the Commission and the Parliament (WWF-EPO official 2010). This also means that member groups know the position brought forward and they trust it to be representative of their, or rather WWF’s, values.

However, the sense was not that the WWF-EPO represents its member groups, but that member groups feel represented by WWF-EPO (WWF officials 2010/11). Acceptance is related to expectations. WWF offices and WWF International expect WWF-EPO to form positions based on gyroscopic and surrogate representation, guided by WWF International and WWF-EPO itself through a formal framework and by the member network through informal cooperation and exchange. WWF-EPO was set up to play an expert role in influencing policy, using technical research and experience provided by the member groups to package solutions. The general goal of EPO is to support the WWF European and global network in better understanding, interacting and changing EU policy legislation. This includes supporting the network of national members through relevant timely information and knowledge of processes in Brussels, letting them know about opportunities arising in Brussels, as it did with the Water Scarcity and Droughts policy, giving advice on what the EPO can do and what the national offices can do and why it is important, i.e. talking or writing to their ministers, and playing the gatekeeper for national networks’ access to EU funds (WWF-EPO officials 2010). Moreover, the member groups together with WWF International initiated the establishment of WWF-EPO and decided on how WWF-EPO should function and what role it should play in line with the overall goals and principles of WWF in the first place, creating a basis of trust in how the office is run. This forms a basis for the acceptance of WWF-EPO’s representativeness by its member groups.
The WWF and WWF-EPO are very professional groups in terms of their technical expertise and the education and experience of staff. The large office is staffed with 41 people, who come from various backgrounds, some have Commission experience or corporate experience, but the majority comes from NGO background. Staffs interviewed have university degrees, experience working for WWF locally and nationally and for other NGOs, as well as some experience in government administration. Since the WWF is science-based and solutions oriented, this expertise is crucial for its credibility. The WWF flagship analysis ‘the living planet report’ is not only a guideline for WWF-EPO, but also for member groups and supporters. The membership of WWF-EPO or rather WWF is based on the belief that WWF acts in order to achieve its ultimate goal for “people living in harmony with nature”. WWF’s credibility is very much its currency, along with experience and expertise. “With the name WWF we have a reputation, a brand value. You take great care to protect it” (WWF-EPO official 2010). Knowledge is also an important factor in the water policy consultations. It matters that a group can demonstrate that it knows its subject and that information provided is reliable. The WWF-EPO trades in information and ideas. The data and solutions it brought to the Commission on the Water Scarcity and Droughts, according to staff, have been considered reliable by the network (WWF officials 2010/11).

In order to create a basis of trust, the WWF for example uses its ‘brand’ to facilitate the marketing of its credibility and reputation as a professional, global group. WWF-EPO’s organisational credibility and its media reputation are both important factors for the acceptance of its leadership. Working very closely with media, for example, when following a dossier as a way to reach decision-makers, has an impact on public opinion, but also reaches some of the member groups and thereby raises WWF-EPO’s profile. Some of the national groups in turn include examples of WWF-EPO’s work when they communicate with their supporters and they report what they have done with supporters’ money (WWF officials
Both, the experience communicated through case studies as well as media reputation create a basis for trust and thus acceptance of the EU leadership’s representativeness by member groups as well as supporters.

Other indicators of acceptance are public awards, for example the WWF-EPO won the ‘NGO of the year’ award for its policy influence and awareness raising through its advocacy campaign aimed at conserving biodiversity in Europe ‘Make Space for Nature’. The award was voted on by people working in groups listed in the EU transparency register or in the European Public Affairs Directory and thus represents an acceptance of their professional cause work amongst advocacy groups and other lobby groups at EU level. This in turn creates a reputation as basis for acceptance for WWF-EPO within its own member network.

Importantly, the funding by member groups and supporters is one of the very key aspects of WWF, which help it be independent. More than 50 per cent of WWF-EPO’s funding comes from membership next to some funding from governments and private companies. Though WWF-EPO assures that it keeps its independence and right to criticise products from funding companies, funding by member groups and supporters gives the group a lot of flexibility and independence. This also allows the group to take a particular position based on science and understanding, without being biased towards a particular economic sector (WWF officials 2010/11).

BirdLife Europe

BirdLife is an umbrella group of a network of independent national advocacy groups. Here the judgement of the acceptance dimension is more complicated and requires the study of both, the acceptance by member groups and by their members and supporters in turn. It thus depends on BirdLife’s and the national groups’ communication structures and whether

105 54% of the WWF-EPO income came from the WWF network in the 2010 financial year (WWF-EPO Annual Review 2011, 21).
or not supporters are aware of their group’s EU activities and supportive of these. BirdLife's acceptance dimension is thus two-dimensional.

One part of the acceptance dimension is expressed by BirdLife's group memberships, who have the choice of being members of the umbrella. Groups become members of BirdLife, because they agree with BirdLife's approach to representing their values and positions. Like BirdLife, both the RSPB and NABU are active for environmental conservation and birds and their habitats are their flagships. The conservation goal is also reflected in the role of member groups’ supporters: For the NABU supporters are “the backbone of [its] financial independence” for conservation work (NABU official 2010) and RSPB officials note “the aim of having more supporters is finance, and finance is only a means to an end and the end is more conservation” (RSPB official 2011).

The member groups’ acceptance of BirdLife’s representative claims based on its gyroscopic approach to representation takes place within a structural framework of broader policy guidelines. Positions have to be formed according to overall guidelines, thus providing a structural and principled basis for trust in BirdLife to take decisions according to groups’ values. The European and Central Asian Committee, which guides and advises BirdLife Europe, is made up of seven or eight directors of member groups, providing some further control and thus acceptance over, and thus acceptance of, BirdLife’s general policy activities.

If national groups wish to represent their interests at the EU level, they need to become members of EU umbrella groups, because the Commission does not generally engage with national groups. National environmental groups have an interest in having their views represented at the EU level, because about 80 per cent of national environmental policy in the EU is discussed and decided upon in Brussels. Thus national groups want their voice heard on issues already discussed at EU level or that they believe should be discussed at EU level, but they themselves do not generally speak the Brussels language, know the EU decision-making
process and contacts for the issues or have the expertise and resources to get active at EU level. They thus join EU umbrella groups of like-minded environmentalists in order to pool resources and enhance political weight. They have chosen to be members of an EU-group precisely because it would lobby EU-institutions for them as well as inform and indeed filter and frame EU issues relevant in their national context. Member groups chose not to get involved, but they support BirdLife to do so for them (BirdLife and RSPB officials 2010/11). There are a number of environmental umbrella groups active at EU level and BirdLife is one of them, representing the values of environmental conservation groups. With their choice member groups of BirdLife thus trust it to represent their voices in the way they would like to be represented. Another general indicator of the national members’ acceptance of BirdLife’s representativeness is moreover the fact that members make up over a third of the funding of BirdLife Europe.\textsuperscript{106}

In the case of the Water Scarcity and Droughts policy, member groups accepted and trusted the RSPB to represent their interests as BirdLife in the Commission consultation and in the stakeholder meetings. The representation relied on the belief in the expertise of the RSPB to be able to comprehend policy implications and present the case of not only the UK position but that of BirdLife as a whole (BirdLife, RSPB and NABU officials 2010/11), because BirdLife and its members share the same environmental values and believes in gyroscopic and surrogate representation (RSPB official 2011):

“So the Spanish and the Portuguese BirdLife members are interested in water and they give us feedback as to what we might want to say in those meetings, but we are the people who have the staff and resources who go to those meetings and they trust us to represent their interests.”

\textsuperscript{106} In 2011, BirdLife Europe was funded by about 35 per cent by its member groups (‘partners’), by about 29 per cent by the Commission and by about 21 per cent by grants and donations plus about 15 per cent from other sources (BirdLife Europe Annual Report 2011).
In the Water Scarcity and Droughts policy case study trust would have been a particularly sensitive issue for the Southern European partners, because historically, there has been a different sense of urgency between the Southern and Northern countries on the issue of water scarcity and droughts. In the policy on the water scarcity and droughts it was thus in particular the Southern countries who fed their long-standing experience into the BirdLife position drafted by the RSPB, thereby generating trust in representativeness of their concerns in the final policy position (RSPB official 2011).

Member groups of BirdLife also trust the RSPB to represent their interests when working in coalition with other groups at EU level. On the Water Scarcity and Droughts BirdLife/RSPB worked in coalition with the WWF. At the Commission meetings there were usually both, WWF and the RSPB/BirdLife present. If neither were available to go to a meeting where a representation was considered beneficial, they would try to get someone else to go along. Limited amounts of conflict of interest between the different groups were reported, decreasing the need to compromise, and therefore facilitating trust (BirdLife and RSPB officials 2010/11). Environmental groups interested in the Water Scarcity and Droughts policy agree with the associated risks the RSPB sees based on gyroscopic reasoning and there is genuine fear amongst groups that wrong decisions are being taken at the European level cascading down to the member states - a risk groups want to avert (Environmental group officials 2010/11).

**By member groups’ members and individual supporters**

The case studies find that it depends on organisational structures and strategies (including issues) what indicators are adequate to judge representativeness or rather the acceptance dimension.

For example, whilst any WWF supporter knows that s/he is part of a global advocacy groups and is hence clear about what the WWF-EPO is active for, for EU umbrella groups such as BirdLife, the breadth or
narrowness of the cause is a consideration. If an EU umbrella represents a single, individuals, even if unaware of the membership and EU activities of the national groups they are supporting, are still bound to be in line with the values represented. The individual supporter is clear about what exactly a group is supporting and what issues and positions the group will thus represent at EU level. Crucially, groups can likewise be clearer about their supportership, their character and their views enhancing the ease of responsiveness. If the EU umbrella on the other hand represents a general cause, then it is important that individual supporters know the EU activities and positions their group is engaging in.

WWF- European Policy Office

In the case of the WWF the acceptance dimension can be judged based on the number of supporters within Europe, since members and supporters have a sense of belonging to a global group with a global mission and strategy. The WWF-EPO is the EU representation of an international advocacy group, whose principles are known by national member groups as well as individual supporters to be global and thus the same at international, EU or national level. WWF-UK supporters understand that they belong to a group that is active EU-wide and globally.

Not only member groups, but also individual supporters know WWF’s structure to achieve its aim when they chose to become supporters or support specific campaigns. The WWF flagship analysis ‘the living planet report’ presents what WWF as a whole and WWF-EPO is active on and for what reason. This includes the fact that WWF’s structure of representation is based on science and show cases rather than democratic participation. Although WWF-EPO does not formally ask its supporters whether they support a particular position, 3.5 million people still subscribe to WWF membership, donate, sign petitions and get active in campaigns, because they support the general and specific issues as representative of their values. WWF-EPO member groups are aware of this support and the role WWF-EPO’s work plays for this support (WWF officials 2010/11).
The representativeness of the WWF’s EU policy positions is established through the acceptance of values (WWF-EPO official 2011):

“When we are advocating a particular position vis-à-vis the European institutions we didn’t really go back and ask all our members whether they support this position or not, but by people supporting a particular cause or by giving a particular value to biodiversity for example, yes I think we do have a legitimacy to go and advocate for the protection of this biodiversity for example or for protection of in my case the rivers, lakes, groundwater that are providing us with extremely important ecosystem services which a lot of the people, both our supporters and non-supporters, very much benefit from or whose livelihoods very much depend on this.”

WWF-EPO’s priorities are based on the mission of the organisation, which has two large meta-goals, one is biodiversity protection, and the other one is reducing the carbon footprint. These are the values WWF supporters and also member groups are supporting and which WWF, and WWF-EPO, represent.

In context with expectations and acceptance it is also important to consider what supporters believe the role of WWF-EPO to be. In response to what the role of WWF is and whom WWF-EPO represents as advocacy group, one official expressed it is about ‘who you are’, which is much more holistic than ‘whom you represent’. It is the combination of a number of factual statements, rather than only the mission statement of ‘representing everyone who is concerned about for example birds disappearing from Northern Europe’. It is about who a group speaks on behalf of, who it represents, which type of organisation it is, what statutes, what members, what mission statement and what historical record working with the Commission on its mission it has and what partnerships with other respective individuals and groups it enters. It is a number of segments that define who a group is. In other words, supporters do not simply chose
WWF for whom or what it represents, but for who it is, what its philosophy is, its organisational credibility, reputation and expertise. Thus representativeness is also about trust in the image of a group (WWF-EPO official 2010):

“What we are trying to do is have an image which is science based, which is solutions oriented. And of course with the name WWF we have a reputation. So it’s not just science, it is actually our brand values. You take great care to protect it” (WWF-EPO official 2010).

Fundraising campaigns in WWF member groups are also a key mechanism to determine which issues are of interest to supporters. Supporters commit their money to a specific cause or policy, for example to a particular campaign protecting a river or stream in their local county. The amount of support shown reflects the interest in the campaign and issue and ultimately WWF’s representativeness.

BirdLife Europe

As mentioned above, because BirdLife is an umbrella group of a network of independent national advocacy groups, the acceptance dimension is two-dimensional. It is partly expressed by BirdLife’s group memberships. But the acceptance by the independent member groups does not necessarily mean the acceptance by their members and individual supporters in turn. Individual supporters of RSPB might not be aware of the issues BirdLife represents in the name of RSPB; hence there is no direct conscious acceptance of BirdLife’s representativeness by individual national group members and supporters. Supporters of BirdLife’s national member groups such as the RSPB in the UK or the NABU in Germany do not necessarily realise that their groups are members of an EU umbrella representing their interests in Brussels. Here, the differentiation of supporters’ expectations and the communication of issues and
transparency are particularly important for the acceptance dimension of representativeness.

For the judgement of the acceptance dimension of the EU-umbrella BirdLife and the water position put forward by RSPB in its name, it is crucial that individual supporters of national groups are aware of the EU engagement of the advocacy group they are a member or supporter of, such as the RSPB (over one million individual supporters) or NABU (500,000 individual members and supporters). However, the degree of information required also depends on the expectations of individual members and supporters. Individual members and supporters of NABU do not have a direct say in the group’s national or EU politics. But NABU’s federal democratic structure means its member groups in which individuals engage might demand transparency and information as basis for decisions. However, of the 500,000 supporters, only a few thousand are active members who get engaged in local groups and the vast majority are passive financial supporters, who are not interested in more than the odd issue (NABU official 2010). Thus the basis of acceptance for active members will be different to passive supporters and the need for feedback and communication by NABU to these groups varies. Moreover, in Germany, the Grüne Liga coordinates the German advocacy groups’, including NABU’s, position on the Water Framework Directive. This adds another level of complexity to the awareness of the federal group’s members and individual members and supporters. NABU consequently has very informative and detailed national and sub-national websites. In relation to the water scarcity and droughts policy the NABU has published elaborate information on the background and decision-making structure, including a table illustrating the work division around the Water Framework Directive between EU groups, national, subnational, regional and local groups. The

NABU also makes its cooperation with international and EU groups clear on its website and social media sites. The information and communication structure of the NABU thus is transparent, creates awareness and sets a very good basis for the acceptance dimension of the group as a whole.

The RSPB has a very large supportership, but the general feedback it gets is that supporters are not very interested in the governance of the group and they do not expect the RSPB to be a ‘democracy’ or expect to influence policy (RSPB official 2011):

“Our market research suggests that most of our members express an opinion that we do pretty much ... they back the stuff we talk about. They might not have a great interest in all the details of water policy or anything, but they can see why we get involved.”

Most supporters expect to know what the RSPB is doing in general, without being interested in the mechanics of it (RSPB officials 2011). The RSPB also does not inform all its subscribers about every step it takes in forming specific EU policy positions. Rather its specific involvement is supported by trust of its members to act in the interest of the group’s values: “If we didn't have that trust of supporters it would be difficult for us in certain places” (RSPB officials 2011).

Individuals support the RSPB in a variety of ways, most importantly financially. Hence, the RSPB has a number of different ways of interacting with its supporters and through which they express their support for national member groups. This takes place for example through offline and online subscriptions, donations, or through social media sites. Individuals also express their active support in volunteering for the RSPB nature reserves and in the offices. In June 2012 the RSPB reported to have almost 18,000 volunteers nationwide who volunteered over 1 Million hours of
work in 2010/11. But the support always has the same conservation objective. In its current campaign “stepping up for nature”, the aim of the RSPB is precisely

“to remind people that everything, every tiny step you take with us, whether it is taking part in the big garden bird watch or signing a pledge, matters and helps us in our end goal to better nature conservation” (RSPB official 2011).

This complex support, however, can only be counted as acceptance of BirdLife’s activities, if the RSPB makes its supporters aware of its BirdLife membership, or rather, if they know what they are supporting. The RSPB also makes the scope of and financial contribution to the work with BirdLife clear on its website:110

“We carry out all our international work as part of the BirdLife International partnership. [...] The RSPB is the UK Partner of BirdLife International and supports both the BirdLife Secretariat, which co-ordinates the work of the partnership, and individual partner organisations around the world. [...] We are strongly committed to the principle of mutual assistance and co-operation that underpins BirdLife and we work with, and in support of, local partners in all our international efforts. We support BirdLife partners with regular, predictable financial contributions, complemented by expert advice and technical assistance.”

The RSPB has a marketing and media department using a whole range of different market research techniques in order to understand what positions supporters and the general public support. In the case of the water policy there was no feedback or input from supporters, but support

109 RSPB volunteering Facebook site post of 1 June 2012 (posted 30/06/2012: http://www.facebook.com/RSPBVolunteering) and RSPB website (accessed 12/09/2012: http://www.rspb.org.uk/about/facts.aspx). Earlier data of 12,000 volunteers delivering some 700,000 hours of assistance, were claimed to be worth over £3.7 million, the equivalent of around 360 additional members of staff (cited in Maloney 2009, 283).
was measured through previous work in the field. Some of the thoughts that went into the policy position paper came from previous RSPB work in the UK context which had involved some of its supportership, for example people who work on water company investment or water efficiency who wrote letters in support of the RSPB’s position, which was used for the European position. The general sense in the RSPB interviews was that supporters trust the RSPB in representing their interests professionally, but have no interest to engage in governance. The dominant supporter profile is that of nature lovers who wish biodiversity to be protected and who give money to the RSPB to do so. Many also volunteer in the nature reserves or even in the headquarters, but very few are interested in getting engaged in more political work at EU level (RSPB officials 2011).

**Professionalisation in gyroscopic and surrogate representation**

The differentiation of representativeness has crucial consequences for the implications of professionalisation. Firstly, the narrow understanding of professionalisation in the traditional sense of bureaucratisation carries implications primarily for groups whose acceptability dimension is based on the traditional promissory representation. Thus if positions are formed through member participation, the loss of member influence in formal decision-making structures negatively affects the representativeness of the position, or the representative claim. In the case of gyroscopic and surrogate representation, the bureaucratisation or rather the absence of member and supporter participation in the formal position formation does not matter, since the position is formed based on scientific evidence and expertise on the ground (gyroscopic) and empathy (surrogate) and because the acceptance dimension is a separate act from the acceptability dimension.
Still, informal communication with member groups is important in order to ensure the position formation is based on experience in the field. But crucial in gyroscopic and surrogate representativeness is that professionalisation can play a positive role for the acceptance dimension: professionalisation in new media technology facilitates the mediation – and indeed the judgement – of support. Also in the case of promissory and anticipatory representation new media technology provides additional and more fluid channels for formal and informal participation in position formation as well as channels for group responsiveness to member and supporter attitudes (Pickerill 2003, 27; Maloney 2009, 283f; Gibson et al 2004, 198).

The section below explains what the bureaucratisation implications for the gyroscopic and surrogate groups WWF-EPO and BirdLife were and how new media professionalisation affects their dimensions of representativeness.

**Bureaucratisation and gyroscopic/surrogate representation**

The traditional professionalisation, or bureaucratisation literature, expects EU groups to represent by putting forward a “relatively unmediated version of the constituents will” (promissory representation, Mansbridge 2003, 516). The EU group is then accountable to its member groups (and they in turn to their members) in the traditional principal-agent sense. If EU groups then professionalise as detected in the literature, centralising their decision-making structures with an elite leadership remote from member groups, their positions might not reflect the preferences of their members anymore. Professional staff in EU groups would become motivated by their paid position and the survival of the organisation, rather than the representation of member interests and their needs. The fear in the literature is that members would lose power over the preferences of EU
groups, which would hence fail to keep their promises and not be representative of their constituency.

Groups may also predict the positions that the members they claim to represent will agree with in hindsight, creating a reciprocal power relation and enabling continuing mutual influence between the point of position formation and re-election/affirmation of support (anticipatory representation). If EU groups professionalise as assumed in the literature, with their participation and communication streamlined and elite staff taking decisions on behalf of members, it will be difficult for them to predict members’ preferences. Moreover, EU groups professionalising their marketing strategies and media appearance (Frantz 2007; Frantz and Martens 2006) might manipulate the preferences of members in their own organisational survival interest rather than educate members’ preferences in the interest of the original environmental mission (Mansbridge 2003, 517, 519). EU groups would create conditions of choice leading members to make choices not in their interest. EU groups would thus lose representativeness.

The assumptions in the group professionalisation literature are that groups apply modern marketing strategies to market their positions and gain support, rather than focus on bottom-up opinion formation; they employ experts who know about the issues in question but not about grassroots opinions; they employ full-time workers with business motives rather than volunteers who want to promote a cause, and organisational structures become streamlined to be more effective rather than inclusive (Frantz 2007; Frantz 2005). The latter includes the rise of groups with decision-making structures that exclude members from participation in opinion formation (see Saurugger 2008 for an overview, Sudbery 2003, 87; Warleigh 2001, 2004) reducing their role to financial supporters, so-called cheque-book participation (Maloney 1999). The literature assumes that internal professionalisation furthers the gap between what EU umbrella
groups put forward as the opinion of civil society and what grassroots civil society opine (Kohler-Koch 2008; Saurugger 2008).

Both BirdLife Europe and WWF-EPO form part of the first mushrooming of EU environmental groups in Brussels (Wurzel and Connelly 2011, 214). Both have full-time staff with high levels of specialisation and expertise. Offices are small (BirdLife) to medium sized (WWF-EPO) in comparison to national offices and other lobby groups in Brussels, employing specialised policy officers responsible for different issue areas such as water policy or climate change. They also employ a number of administrative personnel responsible for the areas of external communication and media as well as finance and office management (division of labour). WWF-EPO moreover has a sophisticated fundraising-department and management structures. Staffs have professional qualifications and are generally highly educated. Policy officers tend to be educated to university degree in their policy areas and are familiar with the Brussels circuit, but they also tend to have advocacy experience at EU and/or national/subnational level, often with member groups. Administrative staffs tend to be qualified in the relevant finance, management, administration or communication subjects. Neither of the groups outsources their lobbying to agencies, but they engage in sophisticated scientific research in collaboration with research institutions and agencies.

The EU groups interviewed thus match the picture of professionalisation anticipated in the literature to some degree, although with WWF-EPO in particular this is not simply a response to recognition but rooted in the group’s principles and strategy since its foundation. The implications for the representativeness of said groups nevertheless have to be differentiated and are not necessarily all negative. Whilst the professionalisation of promissory groups can pose serious risks to their representativeness, for the gyroscopic and surrogate groups analysed this is
not necessarily the case and in fact appears helpful to the cause in most incidents.

**WWF-EPO**

WWF-EPO was set up with the objective of influencing increasingly complex and technical EU policy (WWF-EPO officials 2010). Its gyroscopic position formation is based on scientific research and experience in the field and a professional lobbying strategy that entails working in partnership with government and business.

The WWF have had to professionalise their gyroscopic policy formation over the years. With changing complexities of policy issues (complex targets such as stopping climate change as opposed to local single species conservation), the information required by decision-makers is changing rapidly and requires new types of partnership (WWF-EPO official 2010):

> “Nowadays another contextual feature is just the complexity of the policy areas we are working in. So the types of partnerships we are talking about now are with people like McKinsey and Earnest and Young and some of the big consultancies on energy and grits, Ecofys, these people. [...] We are scaling up. This is not the kind partnership where Unilever and WWF invented the marine stewardship certificate. This is sophisticated econometric analysis of different scenarios for energy and so forth.”

In a gyroscopic group such as the WWF-EPO, this type of professionalism is exactly what is needed to ensure its policies are working towards the bigger goal of the protection of the natural environment and to stay true to its original mission.

The acceptance of its policies is also based on this professionalism. WWF member groups are part of the same global group and follow the same strategy. They expect WWF-EPO to be professional in their work,
using the latest scientific evidence to form their positions. They also expect WWF-EPO to have the specialised administrative, managerial, fundraising and communication skills their 41 professional staffs demonstrate. Supporters are equally likely to expect this professionalism, since they joined the WWF based on its principles of a solutions-oriented professional group.

**BirdLife Europe**

Professionalism is similarly crucial for the gyroscopic position formation in BirdLife. BirdLife’s lists of endangered birds as indicators for the health of biodiversity is what BirdLife Europe and the member groups work with and which is expected to be produced based on professional knowledge and expertise.

Also, BirdLife Europe’s office is staffed with an international team of 15 permanent staff, who collectively provide a wide range of experience and skills within the fields of conservation, capacity building, policy, management, finance, fundraising, advocacy, science, ornithology, communication, marketing and administration and European languages111. Whilst line staff is educated in general fields like communication or finance, the staff working on policy content generally has advocacy group experience and most have worked prior for national BirdLife partners. Some have EU-institution experience, too.

There is a strong degree of trust that member groups have in BirdLife and the way it selects, represents and advocates on environmental issues. This trust is based on BirdLife’s organisational credibility and expertise. BirdLife’s professional activities over the years have resulted in a good reputation and positive feedback from the media, which in turn has an impact on the acceptance of BirdLife’s work as skilful and influential by its constituency and beyond (BirdLife and RSPB officials 2010/11). The ‘bigger

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vision’ paper on agriculture, for example, led by BirdLife Europe, attracted national media and organisations from across the different member states. This media image impacts the acceptance by members and supporters of the direct national member groups and beyond.

**Professionalisation in new media technology**

The traditional professionalisation argument is based on a too narrow conception of professionalisation, which is mostly restricted to bureaucratisation such as the centralisation of organisational structures and specialised elite staff (though social movement literature broadens the term professionalisation to include network structures Kriesi et al. 1995 in Saurugger 2005, 267). It ignores crucial implications of professionalisation in new media technology for both representativeness dimensions, but particularly for the acceptance dimension.

Though gyroscopic groups do not claim to represent members, their organisational structures of representation nevertheless have to facilitate input of member group experience in order to form their positions. Depending on the group structure and strategies, different degrees of feedback and input to positions via differing formal and informal channels are appropriate and have to be valued accordingly. Here, professionalisation understood as a concept going beyond the traditional account of bureaucratisation and instead including professionalisation in new media technologies. This has the potential to enhance representativeness. For gyroscopic, and indeed for surrogate representativeness, new media professionalisation is significant.

New media technology has become incredibly important and influential in the social, business and government environments. The drive towards an increasing application of new media by EU advocacy groups is also a response to the usage of the medium by individuals, supporters and the public. New media technology, with its network characteristics of communication, is changing society and impacts on how people
communicate, what they spend their time on and how people want to be informed, or rather inform themselves since new media tends to give the user much more agency over what and how she consumes (Castells 2000).

Crucially, it also changes how people participate in political activities and how they want to be represented (acceptance dimension). Several interviewees observed a generational shift not only in the usage of different or rather new media, but also a generational shift in participation attitudes. One interviewee explained how its organisational and participation structure fits the ‘old’ member generation, but young people are not following because they are less willing to enter formal, binding structures. Instead, mobile phones and the internet enhance the attitude of not entering binding agreements or commit (WEED official 2011).

When talking about the benefits of the internet it is important to recognise its exclusive factor. The internet is still not accessible to all and some people, in particular young, educated males, are traditionally said to be more affluent internet users than others (Pickerill 2004, 172). However, in the context of this research, which looks at the EU and in particular at Great Britain and Germany as case studies, this argument does not carry the same weight. There has been a great change over the last years during which the internet infrastructure and its speed have been massively improved in the countries and the generations up to in their forties’ grew up with the internet through most or all of their lives. For example, in 1997 a FoE supporter survey showed that only eighteen per cent of supporters were using the internet or emails at a daily basis (see reference in Pickerill 2003, 72). Today, mailing-lists, including regional and topical mailing-lists, activist-led, campaign-specific and broad issue hubs which can be set up by activists and campaigners themselves, e-petitions, Twitter and Facebook form an important part of the group’s communication and campaign

\[\text{WWF's Facebook sites indicate the most popular user age group is 18-24 years (accessed: 14/09/2012: https://www.facebook.com/WWF/likes).}\]
Moreover, the internet has penetrated work and social life across societies, which means people have generally gained the minimum skills to use social media websites and write emails across generations. There is of course partly some resistance to new media, such as Facebook, because of its infringements of privacy. Groups thus apply a variety of new media combined them with traditional forms of communication. This is also a strategic reaction to the changes of journalism and news coverage, which has also been affected by the rise of the internet. For example, groups use the internet to raise their profile, reach more audiences and gain media attention (see also Pickerill 2003, 71 on a short summary of examples).

The statistics on internet and Facebook usage express how new media technologies have entered the social and political lives of individuals. On 31 December 2011 there were 2,267 million internet users in the world (32.7 per cent of the world population at the time). The population estimate of the world was 6,930 million. There were 900 million active Facebook users in May 2012 that is 39.7 per cent of the world’s internet users. The population in Europe was 816.4 million, of which 500.7 million were internet users and 235.5 million were on Facebook. In other words 61.3 per cent of the European population is online and 47 per cent of the internet users are on Facebook. If ‘Facebook.com’ were a country, it would be bigger than Europe population-wise. Interestingly, there are decisive national differences with regards to Facebook usage. 84 per cent of the UK population use the internet, of which 57.9 per cent are Facebook users. In Germany on the other hand, 82.7 per cent of the population are internet users and only 32.8 per cent of them are Facebook users.

113 FoEE, FoE and BUND officials (2010/11) and FoE websites (accessed 20/08/2012: www.foe.co.uk/resource/guides/campaign_hubs_guide.pdf; http://www.foe.co.uk/get_involved/act_online_index.html).
114 Population and internet user estimates are from 31 December 2011, Facebook estimates from May 2012 (accessed 07/07/2012: http://www.internetworldstats.com/).
115 Note that not every user on Facebook is an individual; hence the numbers are only indicative.
116 UK: population 62.7 million, internet users 52.7 million (84 per cent of the population), Facebook users 30.5 million (57.9 per cent of the internet users). Germany: population 81.5 million, internet users 67.4 million (82.7 per cent of the population), Facebook users 22.1 million (32.8 per cent of the
Facebook has become a major source of information and communication for people. On the one hand this means people are changing their attitudes to where and how they look for information, but it also provides new ways of engaging with issues, for example by re-posting, commenting, messaging and liking. Campaigns are shared via social media, emails and online newsletters, which users subscribe to online, which they otherwise might not have. Engagement is quick, effortless and regardless of time and place (other than requiring an internet connected device). Importantly, being able to make use of new media software on new technology devices such as smart phones further impacts information, communication and participation attitudes. Advocacy groups have to respond to the changes in society and particularly changing attitudes of communication, participation and representation. Promissory and anticipatory groups who represent members’ interests have to respond to their demands of how they wish to voice their interests. Gyroscopic and surrogate groups particularly have to use new media to expand and align their channels of acceptance to what supporters expect. Crucially, social media can build a sense of community and solidarity.

Online channels are constantly improved, but their application by EU groups is still in its infancy and is not used to its full potential. This is partly because EU groups tend to use it reactively to users demands as opposed to innovatively and experimental. ¹¹⁷

**Impact of new media technology on the two dimensions**

New media technology has an impact on both representative dimensions. On the one hand, professionalisation in new media internet users). Data from 31 March 2012 (accessed 07/07/2012: http://www.internetworldstats.com/). Note that there are national social media sites who may be more popular, such as StudiVZ in Germany or Bebo in the UK. ¹¹⁷ This became apparent through interviews with the groups, but also by looking at when groups started using Twitter and Facebook, as well as emails and other technologies that have been available for many years. Pickerill suggests that large more hierarchical and formalised groups are slower and less innovative in their use of new media technologies, whilst small non-hierarchical structures benefit the most of using innovative technologies (Pickerill 2004).
technologies facilitates expert knowledge and case study input to issues on the agenda and policy positions from member groups, essential for gyroscopic position formation. On the other hand, new media technology is a medium through which member groups, individual supporters and the general public can express their acceptance of a group as well as its policy positions, campaigns or goals.

New media and acceptability

New media technology helps to create and reinforce existing networks of communication and linkages between EU member groups as well as network members (Pickerill 2003:76). The linkages also enhance the relationship between national groups and their local member groups (Washbourne 2001, group officials 2010/11). New media can thus help inclusion amongst already existing member groups and supporters (Pickerill 2003, 64). Moreover, it encourages individual staff working on policies to communicate, and spreads a sense of solidarity amongst staff in member groups and supporters alike, reducing feelings of isolation (Warf and Grimes 1997). New media technology thus helps to facilitate local connection and coordination with EU offices as well as coordination and exchange of experiences between national member groups and with EU offices (environmental group officials 2010/11). This input and exchange of expertise in the field with EU groups is crucial to enable gyroscopic representation.

There is a clear development towards incorporating new media technology into organisational and communication structures amongst the group interviewed. Organisational structures and strategies impact on how fast groups adopt the different new media technologies and the width (access) and depth (variety) of the new media tools employed. The application of tools in policy teams moreover depends on the computer knowledge officials have (environmental group officials 2010/11).
Although the WWF-EPO decision-making structure has hardly changed, the informal participation and communication structure has changed and improved considerably through new media technologies and web 2.0. This has helped WWF-EPO to be responsive to the Brussels political environment, whilst receiving input and feedback from the WWF network, counteracting some traditional bureaucratisation tendencies (WWF-EPO official 2010):

“We have to resemble the institutions we are trying to lobby. That means that we have to look like, and act like, and be on a similar time frame as the official institutions. And so all the difficulties they have with organising technical working groups, council meetings, council formations, interacting with the parliament, is exactly the same thing as what we have. The only thing that you could say may be slightly easier, in fact massively easier is communication, because of internet, because of the video conferencing and other things that have made some life easier. But the processes themselves they are all the same.”

Informal channels of participation are incorporated into existing formal decision-making at two different levels. One is in the overall strategic direction and priorities of the office, adjusting and amending it in light of the needs of member groups. Secondly, it is incorporated in the specific policy initiatives that the about 20 networks of the WWF-EPO ‘hub’ take, aligning and adjusting positions with what national WWF offices say is acceptable to them (WWF-EPO official 2010).

Input for the strategic direction and priorities of WWF-EPO are determined in the strategic meetings every five years, but WWF-EPO has recently started to commission surveys sent through to the network via email in support of formal channels (WWF-EPO official 2010):
“We get results from surveys and put that into revisions of strategy plans to see if there are new issues emerging that we may not have been aware of. We are just in the course of doing one now and it is proving to be a very useful tool. It's the start of a more regular sounding out.”

The use of new media in the specific policy teams has informative, communicative and participatory objectives. Communication with the policy and national network is the responsibility of the policy advisers. It thus depends on the policy area and policy officers and how communication technologies are employed, partly because some staffs are more technologically savvy than others. WWF-EPO’s water policy staffs for example do not apply social networks much for the Water Scarcity and Droughts policy, but the area of social networks such as Facebook has been identified as one of the areas that the team would like to explore more (WWF-EPO official 2010). WWF-EPO generally meets relatively frequently in Brussels as well as alternate places outside Belgium, but the technology helps communication and to make information available in the meantime and across member groups, networks and teams.

Since water is a cross-cutting issue, encompassing economic, social, environmental and cultural factors, it is relevant for various policies. The water policy network thus uses a comprehensive integrative communication approach and the network includes experts from WWF’s parallel teams such as marine or agricultural teams. WWF-EPO officials still consider personal meetings crucial for information and participation, and phone conversations and conferences are important mechanisms in particular in really urgent cases, or to update people and to discuss problems (WWF-EPO officials 2010). But new media technologies have become most important for internal information and participation. Even though participation is not understood in the sense of democratic representation in order to be representative of members, it is nevertheless considered “crucially important if you run a European network to get input”
WWF-EPO relies extensively on Emails and mailing-lists and since recently also an intranet working with Google Applications and documents. Google docs form an integral part of WWF-EPO’s web content management system (CMS). WWF-EPO has a partnership with the Google site and Google documents are used as repository of all documents and to share news. It is considered extremely helpful for revising documents, sharing presentations and having online-discussions. For example questions can be posed to the policy team which anyone can offer advice on who might have experience or knowledge and members can put forward changes to positions. The use of online conferences and Skype, the latter having the advantage of indicating availability as well, is becoming more popular, too (WWF-EPO-officials 2010). WWF’s organisational culture is solution-oriented (problem-solving) thinking and new media technology is applied to that objective. That means member groups are able to deliver experience and knowledge through the new media tools mentioned and are consulted and give their consent through them. These are also the channels through which WWF-EPO and its member network set and report on deliverables.

BirdLife Europe

New media technologies are the core mechanisms to raise awareness of issues and discuss and form positions that then represent BirdLife. New media technologies allowed for scheduling flexibility and geographical independence of staff and member groups involved in decision-making. Participation is not only enabled via personal meetings or rather the bi-annual formal meetings, but new media technology professionalisation complements the more formal structures of decision-making within the group. Personal meetings are very valuable, but not always manageable, and the mailing lists are the most effective tool for information and

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118 WWF-EPO uses a content management system (CMS), also called a Web management system, which in their case is a group of Google applications and tools that enable the organisation to seamlessly create, edit, review and publish electronic text. Staff can access the CMS online using a web browser.
participation for BirdLife (BirdLife official 2010). The BirdLife mailing lists are its core and very actively used tool for the discussion of position papers and exchange of views generally. In the water policy case the RSPB formulated the position, which was then emailed around the BirdLife member groups for input, comments and amendments. New media technologies enable EU policy officers and directors of national member groups to communicate, detect policy interests and form positions on policy issues informally and without the requirement to meet face-to-face (BirdLife and RSPB officials 2010/11).

Mailing lists are also a way for BirdLife to send out lobbying opportunities and collect signatures, encouraging member groups to sign campaigns. For example for the marine bycatch action plan it collected about 30,000 signatures (BirdLife official 2010). Google documents and the intranet are further tools applied to discuss and receive input of member groups though it depends on the member groups’ usage whether and to which degree these are employed. Input and dialogue are further enabled mutually through individual emails, phone conversations and phone interviews, providing a more private space for the exchange of specific views and insights.

Generally, input through new media technologies is informally taken into account and assessed and its relevance judged on the secretariat level for BirdLife’s European purposes. For example, if input is considered too marginal for example, in the sense that it is about a local problem rather than a European one, BirdLife will try and direct the groups to the channel it thinks is more appropriate (BirdLife official 2010).

**New media and acceptance**

New media technology also has an impact on the acceptance dimension of representativeness. Existing networks of communication and linkages between EU and member group staff, as well as supporters, encourage staff to connect on policies and help create and reinforce trust
and solidarity (Pickerill 2003, 76), moreover reducing feelings of isolation (Warf and Grimes 1997). Solidarity is the basis for empathy and is particularly important for the acceptance of EU groups’ activities across national boundaries.

Groups use the internet to create new channels of acceptance, by raising their profile, reach more audiences and gain media attention (see also Pickerill 2003, 71 on a short summary of examples).

WWF- European Policy Office

Professionalism is a core part of WWFs and WWF-EPOs image, to which people subscribe. The WWF-EPO was established to play precisely that professional role because member groups felt that this was necessary to represent their interests. EU groups have to be professional, know how the EU institutions function and have knowledge and a track record in the specific policy fields (WWF officials 2010/11). Professionalisation in new media technologies in particular makes it possible for WWF-EPO to carry out its role to influence policy through expertise and packaging experience and showcases into solutions for EU institutions. This professional image in turn postulates a continuing professionalisation, including in new areas such as new media, for the group to be accepted as representative of what it stands for.

By being an informative and communicative tool, new media technology provides the basis for the acceptance dimension of WWF’s representativeness. Improving the communication of WWF-EPO’s activities and goals is crucial for members and supporters, as well as potential supporters, in order to have a clear idea of who they are supporting and why. At the same time, new media technology is a medium through which member groups, individual supporters and the general public can express their acceptance of policy positions, campaigns or goals.

For WWF-EPO itself, new media technologies have enabled responsiveness to the interests of its member groups and to the attitudes
of individual supporters and the general public. This includes responsiveness to empathy expressed by supporters and the public for specific causes, improving the quality of surrogate representation. This in turn enables WWF-EPO to make sure member groups and in particular supporters, who have no formal say in the formation of positions, accept its gyroscopic positions. Whilst Google documents are used for internal communication and participation, Facebook is used for external communication and as a way to reach new audiences that the WWF had not reached otherwise and to raise awareness of issues with a larger audience. Communication and channelling acceptance through social networks is mainly through WWF asking to support online petitions, asking for feedback, inquiring about what supporters think and about public opinion and ideas and to generally interact with and inform supporters and the public.

Being a global advocacy group, it is less important for WWF-EPO specifically to play the informative and communicative role with supporters. This is a role the WWF as a network performs. Supporters accept the WWF-EPOs activities because they understand the WWF as one. To communicate its positions and values, the WWF uses an extensive and interlinked mixture of new media technologies, in particular social media, which are very popular. On their professional websites national and EU groups inform about each other’s work and national groups make their EU involvement clear.\(^{119}\) Facebook (WWF International (1,039,362 likes), Germany (104,322), UK (24,754)) and Twitter (WWF-EU (1,679 followers), Germany (17,354), UK (14,474) and UK Public Affairs (2,729)) are also used extensively and link to each other.\(^{120}\) There are various tools for individuals,


but also groups, to express support for WWF. A relatively new tool to express general support is the option to “donate a tweet a day” to WWF by simply signing up to Justcoz.\footnote{Justcoz website (accessed 20/09/2012: http://justcoz.org/).}

**BirdLife Europe**

BirdLife uses new media to create channels of acceptance for its member groups as well as their individual supporters in turn, and to build a reputation and its global image.

For BirdLife member groups, new media technologies provide ways to be informed about activities and positions of the EU group as well as other national groups in the network. They can thus observe and chose to get involved according to their interest and capacities. The transparency provided further enables groups to accept and trust the BirdLife leadership as well as the network. It enables an exchange of information as well as communication on activities and policies between groups that does not require top-down or one way facilitation through hierarchy. BirdLife, RSPB and NABU cross-reference each other on their websites and link to EU and national press releases and studies of each other, as well as informing about EU-wide campaigns. This provides a basis for gyroscopic representation through experience and expertise, as well as enhancing trust, credibility and a feeling of solidarity.\footnote{BirdLife website (accessed 12/09/2012: http://www.birdlife.org/regional/europe/partnership.html), RSPB website (accessed 12/09/2012: http://www.rspb.org.uk/international/birdlife.aspx) and NABU website (accessed 12/09/2012: http://www.nabu.de/nabu/birdlife/).}

New media technology facilitates the expression of support and hence acceptance in a number of ways. Though not applied in the case of the Water Scarcity and Droughts policy, on several issues campaigning/signatures were used and are considered a method of participation which express acceptance of the position and representation by member groups as well as individual supporters of member groups, depending on how these tools are employed. Social media channels are
further informing about opportunities to get involved in BirdLife and its member groups. Facebook and Twitter for example provide crucial channels for members and supporters to express their acceptance, however BirdLife Europe does not have its own pages and the social media is managed at the international level. On the international page people can post about issues they support, share them, tweet and re-tweet them and ‘like’ Facebook campaigns and events set up in support of specific issues. The official BirdLife Facebook page has about 19,000 ‘likes’ (May 2012). The other Facebook page of BirdLife International, “the unofficial fans page”, is liked by over 7,700 people (May 2012). On these pages supporters have the opportunity to like also campaigns and events organised in other countries around the globe as well as in European neighbour countries.

Importantly, new media technology also helps BirdLife to create a reputation and report on international stories of experience and expertise, in order to create a basis for (European) acceptance. BirdLife International’s presence on Facebook and Twitter (13,094 followers)\(^\text{123}\) for example helps to create a reputation amongst members, supporters and beyond. Moreover, stories on social media get picked up by the press (RSPB official 2011). BirdLife International’s social media links to BirdLife Europe member groups such as NABU and RSPB as well as their regional/local member groups. BirdLife’s Facebook page publicly informs about the work BirdLife International does across the globe, including local, national and international stories, as well as political news, conferences, opportunities to get involved and other events related to wider conservation issues. BirdLife uses Facebook (BirdLife International) and Twitter to inform about relevant local, national and EU political news, as well as on events and conferences.

Also the national groups’ usage of supporter newsletters, Facebook and Twitter (NABU: 6,804 followers)\textsuperscript{124} and their blogs are crucial for raising awareness amongst supporters of their group’s EU activities in order to enable them to express or decline support and thus acceptance. Messages clarifying the belonging to the global BirdLife network, for example the RSPB’s mission sections on its Facebook pages raise such awareness: “The RSPB is the UK charity working to secure a healthy environment for birds and wildlife, helping to create a better world for all of us. We belong to BirdLife International, the global partnership of bird conservation organisations.”\textsuperscript{125}

But at the same time it is important to differentiate between supporters. National member groups such as the RSPB have a large supportership, made up of all sorts of identities, such as subscribers (people who give money), volunteers, people who sign pledges, who lobby politicians, or passionate bird-lovers who participate in activities such as the Big Birdwatch to encourage bird habitats in their gardens. “In theory there is a core purpose of the RSPB that then relates out to those [types of supporters]” (RSPB official 2010). This also means that the channels of acceptance for the RSPB have to be diverse in order to accommodate how these supporters wish to get involved and express their support, but also how much feedback and information they would like in return. Social media has great potential here. In response, the RSPB has thus diversified its channels of support (RSPB official 2011):

“[We set up a team] on how we can update our technology infrastructure to enable us to communicate with our supporters in a way that is relevant to them. We’re very good at doing that in face-to-face situations, but when it comes to email and social media, our hands are tied because we just don’t have the right technology and processes in place. [...] our ultimate objective is to

\textsuperscript{124} NABU Twitter page (accessed 14/09/2012: https://twitter.com/NABU_de/following).
\textsuperscript{125} RSPB Facebook site (accessed 12/09/2012: http://www.facebook.com/RSPBVolunteering/info).
build the capability to get to know more about who our supporters are, what they’re interested in, and what their expectations are. Only then can we start to have a meaningful dialogue with them.”

The RSPB uses a variety of means, such as its community and volunteer blogs, Twitter (31,381 followers)\(^\text{126}\) and Facebook. On Facebook itself the RSPB again has several pages accommodating different supporter types. It has the national ‘RSPB love nature’ page (24,385 likes),\(^\text{127}\) as well as various regional/local pages mostly used by supporters with some official RSPB input. There are event sections and information about annual general meetings, member weekends, events, campaigns and other activities.\(^\text{128}\) In addition there is the RSPB volunteering Facebook site (4,150 likes), reporting about national and some European and international policy activism, campaigns and volunteering events, and linking to other environmental and conservation groups.\(^\text{129}\)

The advantage of social media is that it is not only about what a group chooses to put out to its supporters, but it facilitates supporters to have the conversation that supporters wish to have with a group (RSPB official 2011). For the RSPB this is predominantly gardens and birds. The RSPB as an organisation does not wish to be seen simply as that, because it engages in many more fields. But it also recognises that

“if that is what people come to us about we have to honour that conversation, before you can start educating them about something else and probably they’ll listen better to the other messages we’re putting out. It is important to remember that Facebook is an open channel and people have made it what they want it to be” (RSPB official 2011).

\(^{126}\) RSPB Twitter page (accessed 14/09/2012: https://twitter.com/natures_voice).
Thus being transparent about what a group does and at the same time responsive to what supporters want to hear and engage in can be conflictual. The example of the RSPB shows how the group has to balance its wish to educate its supporters about policies, campaigns and action-led news with the actual supporter engagement interests. The acceptance of a group as representative does also require a group to learn which messages to put out to which audience and how.

“Ultimately we want to try and change people’s perception of the RSPB [but] the majority does not want to talk to us about climate change [...] it just doesn’t get an ear. If we put a post it just doesn’t get any response at all. If it doesn’t work we’ll try and put it out in a different way” (RSPB official 2011).

Here social media has great potential, because groups can observe what people engage in and how as they engage with each other. At the same time, it allows groups to communicate contentious messages, which are more difficult to put out indirectly through the press. It takes out the intermediate channel and enables direct and targeted conversation with selected audiences (RSPB official 2011):

“When you rely on a third party, press, media, the chances are the message is not quite the same. In that respect we are using social media as if it were face-to-face. We are getting more directly to the right audience.”

The most revolutionary aspect of social media is the sense of community and solidarity it creates between strangers and people who are in no geographical proximity.

“Facebook clearly has a community about it. You can see the interaction and conversation. People talk to each other, so we could really clearly see what their interests were. Twitter is easier for us to use as broadcast channel, but we also find out what
people are talking about as well and by running searches and using hash tags you can get a sense of what the conversation topics are, but it is harder to get that sense of community. But we recently had ‘Big Garden Birdwatch’. It was the first time that we could see just how many people were talking on Twitter using hash tags, complete strangers were making jokes and the sense of community was really really strong. Whilst on a day to day basis it is harder to see on Twitter, with Facebook you can see everyone’s interaction visibly there on the screen, fitting in together” (RSPB official 2011).

The example of the RSPB shows how much potential it has in helping groups understand their members and supporters as well as providing new channels of acceptance, ultimately enhancing groups’ representativeness. The better awareness of NABU and RSPB supporters in turn provides representativeness to BirdLife’s positions and activities.

**Conclusion**

This case study shows that advocacy groups representing a cause do not tend to have promissory or anticipatory, but predominantly gyroscopic and surrogate, representation structures. Environmental groups by their very nature are active on behalf of the environment and the people depending on that environment. Thus when environmental EU groups note that “[...] my role is not to encourage the most participatory governance, but to ensure the best results for the environment” (Sudbery 2003, 91f), this is because most environmental groups have a gyroscopic and surrogate representation structure representing a cause. They do not violate participatory principles of promissory representation. Moreover, for most environmental groups, in particular those dealing with climate change, the urgency of the matters they deal with leads them to prioritise taking action in order to prevent climatic and environmental catastrophes as opposed to how or through which agency to achieve the decision on action (Goodin
This is in line with the gyroscopic argument of representing based on scientific findings and common sense, rather than by democratic votes of members. The formal and informal decision-making structures serve to establish agreement on the ‘how’ rather than the ‘what’ with member groups, thus they make sure policy positions are aligned with lobbying strategies and campaigns carried out at the national level as well as safeguarding the compliance with both visions and missions of the groups.

Environmental groups form their positions based on scientific research and expertise on the ground, not because members and supporters have formed and formally voted on a position. The nature of the environmental cause they represent explains why the acceptability dimension here is gyroscopic. In addition, the acceptability dimension is surrogate, because they stand in for the environment and future generations, which themselves have no voice. They form positions around topics and points of view that are not, or only insufficiently, represented in the political discourse, such as nature, biodiversity or the poor in the developing countries.

Both WWF and BirdLife rely on scientific data, expertise and experience on the ground when they form their positions. Expertise is the tool to reach a normative goal which is set in a group’s mission and visions. Groups are professional in their use of scientific data and expertise, and their main scientific references are studies produced by the groups in cooperation with research centres. For both groups the support of member groups for positions is considered important, but it varies according to the issue and member group interest, and to which degree this support is presented. Gyroscopic and surrogate representation is not independent from support through members and supporters. Rather than responding to direct votes on positions, these groups have to make sure that the scientific data they form their positions on is reliable, that the experience they draw on is relevant and that their arguments are in line with their group
principles. If they do not follow these rules, their reputation and credibility are in danger and that in turn means a loss of support and impact.

The difference between the two groups is their organisational type, which has an impact on the way the acceptance dimension can be judged. The WWF-EPO is the EU representation of an international advocacy group, whose principles are known by national member groups as well as individual supporters to be global, thus the same at international, EU or national level. In the case of the WWF the acceptance dimension can thus be judged based on the number of supporters within Europe, since members and supporters have a sense of belonging to a global group with a global mission and strategy. WWF-UK supporters understand that they belong to a group that is active EU-wide and globally. BirdLife on the other hand is an umbrella group of a network of independent national advocacy groups. The acceptance dimension is partly expressed by BirdLife’s group memberships, who have the choice of being members of the umbrella and agreeing to BirdLife acting in their name. However, supporters of BirdLife’s national member groups do not necessarily realise that their groups are members of an EU umbrella representing their interests in Brussels or that as in the water case study, national groups represent their interests through the BirdLife network and name at EU level. Here, the communication of issues and transparency according to supporter expectations is particularly important for the acceptance dimension of representativeness. However, the examples of the RSPB and NABU show that their new media usage, such as websites, supporter newsletters, Facebook, Twitter and their blogs raise awareness amongst supporters of their group’s EU activities. They thus enable their supporters to express or decline support and thus acceptance.

The fact that gyroscopic and surrogate groups in the case studies connect their representative claims to existing government commitments and regulations strengthens the claim that positions are formed in the interest of the environment and specifically the general public and future
generations. The policy goals on water scarcity and droughts are set in the frame of EU standards and (binding) legislation for environmental protection, including that on the quality of water (for example the 'Birds' and 'Habitats' Directives adopted by EU member states and the European Parliament). Further EU commitments on paper that are strengthening the relevance of BirdLife’s representation request are the principle of sustainable development and the goals to reduce greenhouse gases in the fight against climate change.\textsuperscript{130}

Another mechanism for gyroscopic and surrogate groups to ensure positions are formed in the interest of the environment and specifically the general public and future generations are public opinion polls and surveys. The water policy relates to climate change. Opinion surveys reveal that action against and adaption to climate change are primary concerns of the European public. Over two thirds of Europeans see climate change as a ‘very serious problem’ and almost 80 per cent believe that fighting climate change can ‘boost the economy and jobs’. Europeans see climate change as ‘the second most serious problem facing the world’, ‘more serious than the economic situation’ (TNS Political and Social, 2011). Groups fighting against climate change thus form their position based on empathy with a constituency that goes beyond the member- and supportership and is in the general interest of the public. The fact that they do so thus strengthens the acceptability dimension of surrogate groups. The public opinion poll helps judge the strength of the (surrogate) acceptability dimensions in this case. Opinion polls also help understand what supporter expectations may be – and how they may vary. For example, over one third of Eurobarometer respondents across the EU think that the EU should propose additional measures on water-related issues, and want to be able to express their views on such measures (37 per cent). An almost equal proportion (36 per cent) think the EU should propose additional measures, but are not

interested in having a say on them (TNS Opinion and Social 2012, 18). Moreover, at least three quarters of respondents also consider floods (79 per cent), and droughts and overconsumption of water (75 per cent) to be serious problems (TNS Opinion and Social 2012, 9).
The assumption that groups necessarily lose their representativeness as a result of professionalisation has to be revisited taking into account varying organisational structures and strategies and considering the two dimensions of representativeness established in chapter two and three.

The case study analysis is therefore divided into three parts: introduction to the groups and case, organisational structures and strategies of representation, and professionalisation. Firstly, the Commission’s emission reductions communication is introduced and EU groups engaged with the policy are presented (Friends of the Earth Europe, Greenpeace Europe, Climate action Network Europe). Secondly, the promissory (and anticipatory) representation structure as assumed in the existing literature is reviewed and compared with the predominantly gyroscopic and surrogate position formation found in the empirical examples. Moreover, the consequences of distinct organisational structures and strategies of representation for the acceptance dimension of representativeness found in the case study groups are explained. Thirdly, the assumptions of the impact of professionalisation, or bureaucratisation, on group representativeness in the existing literature are reviewed and revisited taking into account gyroscopic and surrogate representation structures. The conception of professionalisation is then extended to include new media technology and its implications for the two dimensions of representativeness. Empirical findings support the thesis that group representativeness is two-dimensional and more complex than hitherto assumed in the professionalisation and representativeness dichotomy.
literature. Moreover groups increasingly professionalise their new media application constituting alternative channels of support and feedback; and hence providing further potential to positively impact representativeness.

**Organisational structure and strategy of representation**

The thesis suggests that in order to understand the representativeness of a group, it is necessary to look at its organisational structure and strategy. The following section first reviews the representation structures and strategies the literature assumes groups have, presuming that representatives’ preferences are induced by the constituency. The cases of Friends of the Earth, Greenpeace and Climate Action Network Europe then reveal that these environmental groups have different organisational structures and strategies of representation. They form their positions based on science, rather than on members’ votes or preferences, and member groups and supporters often express their acceptance of the position represented via means other than democratic votes or participation in governance structures. Taking into account the two dimensions of representativeness, combined with the distinct organisational structures and strategies, it becomes apparent that the evaluation of representativeness depends on and varies according to the structures and strategies of interest representation.

**Forming positions**

The literature on the professionalisation of EU advocacy groups assumes that professionalisation negatively affects group representativeness (on a threshold of media performance professionalisation see Frantz 2007; Frantz and Martens 2006; Saurugger 2005). One of the arguments in the literature, set out in chapter one, is that there is a lack of member and supporter participation (see Saurugger 2008
for an overview, Sudbery 2003, 87; Warleigh 2001, 2004). Moreover, institutionalisation of advocacy groups is said to lead to the centralisation and bureaucratisation of organisational structures and the creation of elite leadership remote from members and supporters, or grassroots interests (Kohler-Koch 2010, 111, Kohler-Koch 2008; Warleigh 2001). Positions put forward by EU groups in Brussels no longer represent the interests of their member- and supporter-ship, because members and supporters have no or little say in the formation of EU positions (Sudbery 2003, 87; Warleigh 2001).

The assumption in the literature is thus that groups form their positions based on democratic member votes or participation in organisational governance. Their positions are induced by the preferences of the members’ interests and the grassroots supporters. In other words, positions are formed to represent members’ preferences. Representatives are ‘acting for’ (Pitkin 1969) members and members cause changes in the groups’ representative behaviour (Mansbridge 2003, 521). The organisational strategy is to represent ‘humans’, since the interests represented are those of the constituency, thus of the members. The human characteristic further includes that the constituency (members) could potentially speak for themselves (Halpin 2006, 926).

The EU groups might thus put forward a “relatively unmediated version of the constituents will” (promissory representation, Mansbridge 2003, 516). The EU group is accountable to its member groups (and they in turn to their members) in the traditional principal-agent sense. EU groups have to keep their promises in order to be representative of their constituency. Or EU groups might put forward a position they predict members will agree to in hindsight (anticipatory representation, Mansbridge 2003, 517). This creates a reciprocal power relation and enables continuing mutual influence, because it leaves room for members to change their preferences and for EU groups to influence members’ preferences (2003, 517f).
In short, to be representative, the literature expects members of EU environmental groups to have a say in the governance of the group. This implies that member groups participate in EU position formation and that they internally provide for participatory structures down to the grassroots in a way that assures their opinion is reflected in EU positions. Structures of representation would give member groups and their members in turn power over the EU groups’ representative activities. Judging representativeness is based on either the numbers of members/supporters (promissory) or the deliberative qualities of the communication between EU groups, member groups and grassroots (anticipatory).

However, positions may also be formed based on values, principles, expertise or empathy. In the traditional promissory and in the anticipatory forms of representation the representatives’ preferences are induced by the constituency whilst in gyroscopic representation, the representatives’ preferences are internally determined. Neither gyroscopic nor surrogate representations require participatory position formation as promissory representation claims do.

The case studies show that groups represent environmental interests not primarily through participatory decision-making structures as assumed in the traditional literature. Groups form their positions based on gyroscopic factors such as scientific knowledge, experience and common sense among the leadership. Decision-making structures tend to be in place to make sure national and sub-national experience and expertise is considered in the position formation and to decide on the ‘how’ rather than the ‘what’ (Greenpeace Germany official 2011). Moreover, their position formation reflects the interests of future generations and the environment, such as nature, the climate and biodiversity, and is thus a surrogate representation.

The important difference between promissory or anticipatory and gyroscopic or surrogate representation is not about whether or not member groups get involved in the formation of a policy position. It is
about whether the policy position itself is based on a bottom-up issue that individual and group members have raised, or whether the need for action is based on scientific, experience and common sense factors. In other words, the promissory representation requires a democratic structure that resembles the specific needs and interests of the members themselves, whilst the gyroscopic representation primarily resembles the interest of a cause based on scientific analysis, experience in the field and common sense, though this is of course happening in the interest of member groups and individual supporters or else they would not be supporting such a cause (acceptance dimension). Consensus or agreement structures are in place to receive agreement for proposed policies based on gyroscopic reasoning, rather than to enable democratic participation in which the interests of the base are represented at the top.

**Representation in EU environmental groups: The acceptability dimension**

*Friends of the Earth Europe*

FoEE's official slogan is "for the people, for the planet, for the future". FoEE is active for the environment and the people, but it is the member groups that decide on the broad topic areas and how to facilitate campaigns in their countries and communities in that interest. As one FoEE official sums up (2011):

"We have to take account of our member organisations, we are a democratic organisation, so our member organisations have a say in how the organisation is run, but I don’t think we work exclusively in the interest of our members. More generally we represent the voice of European people and the environment, really.”
In order to facilitate that the group acts in the interest of the environment, actions are evidence-based and rooted in findings of climate science. As one interviewee explains (FoEE official 2011):

“if we take it on an issue by issue basis, we can see what climate science is telling us [...] most of us would agree that there is overwhelming consensus on climate change, and so our actions are underpinned by an understanding of climate science. That we have a certain carbon budget available to us and we cannot safely exceed certain amounts of emissions and at the moment Europe is emitting far too much and has historically emitted far too much. So we have to take action on that.”

FoEE is moreover a surrogate group, since it represents the environment and future generations, which have no voice. In this context it also represents equitability values, in other words it tries to balance the (in)equitable causes and effects of environmental problems on people from the North and the South. It therefore bases its positions on empathy with ‘the people’. Although FoEE and its member groups consider themselves active in the interest of the general public beyond members and supporters, sometimes the interest of the environment can stand in contrast to the personal interests of individual citizens. In that case the protection of the environment is the decisive indicator (FoE-EWNI 2011):

“The starting point would have to be the environment [...] on occasions [...] the support for the environment is not necessarily widely supported, so an example is increasing taxes on fuel duty or petrol. We think that it is necessary to drive down carbon emissions and our supporters that are close to us think that it is necessary, but it is clear that the bulk of the British population at least wouldn’t be supportive of that. But we still have to advocate that position.”
FoEE’s members decide on the response to science in the form of positions, lobbying and campaign strategies. But their motive for action is based on science, rather than on individual member interest. Actions are not induced by members, as explained by a FoEE official (2011):

“That’s not something which our members are … I mean… on the one hand [action against emissions] is what our members are telling us, but that follows from an analysis of the reality of the environment. Same if we look at biodiversity, same if we look at the impacts of farming, both in Europe and globally, same if we look at global consumptions and resources.”

Research is carried out either by member groups or is commissioned together with other groups, since FoEE is not primarily a research group. The extent of in-house research also depends on the programme, for example the FoEE food and agriculture programme might undertake more of its own research (FoEE official 2011). In the context of climate, one of the most significant pieces of research over the last years is the study on the possibility of a 40 per cent reduction of emissions across Europe, released by Stockholm Environment Institute in partnership with FoEE (FoEE official 2011). FoEE has issued further publications on emissions reductions applying scientific and economic analysis, and proposing policies in order to meet climate change goals.¹³¹

Despite FoE’s (and FoEE’s) hierarchical structure, FoEE conceives itself not as superordinate EU lobby office, but as the network hub of its 30 member groups (FoEE Annual Review 2011, 3). Although FoEE has a scientific approach to position formation, stating that its “demands have always remained true to both science and justice” (2011, 3), it puts great emphasis on voicing local struggles and interprets its role as representing “European voices collected in member groups” (FoEE official 2011). Its task

is to facilitate the dialogue between its member groups in order to engage in a more coherent approach with EU institutions and hence influence policy. It is the member groups that set the policy and strategy at headline level. Most of the main policy positions, the main directions within groups, come from demands of member groups or have been checked and agreed to by member groups (FoEE official 2011). For example, the FoEE strategy plan is agreed by member groups, five of whom also make up the board of FoEE (2011/12). However, the EU office plays a big role in having an overview of the situation in Europe, such as what issues are being lobbied on. FoEE is governed by a mixture of formal and informal decision-making. The formal Annual General Meetings, the decision-making body of FoEE, are attended by senior representatives from all member groups, where they take part in evaluation, planning and decision-making, and the election of the Executive Committee. The Executive Committee meets four times a year to take strategic decisions between Annual General Meetings and to oversee the implementation of the decisions made by the Annual General Meetings. The Executive Committee also appoints the FoEE director and delegates operational decision-making to her.\textsuperscript{132}FoEE has core programmes set around issues such as climate justice and energy, each of which has a steering group with four or five group members who are actively working on it and who generate campaigns. Central Europe-wide campaigns are thus set at the EU level by FoEE and senior national representatives. The national groups work on the main issues affecting their own country and choose to participate in the European and international campaigns which are relevant to them. In turn, the local campaigners can work on local, national and international campaigns. Varying from campaign to campaign, FoEE will have conferences and most programmes have face-to-face campaigner meetings with those working on an issue. At the campaigner meetings on climate at alternating locations,

\textsuperscript{132}FoEE website (accessed 08/07/2012: http://www.foeeurope.org/about/how-we-work).
for example, there are around 20 people from 10 or 15 member groups, if possible subsidised by FoEE (FoEE official 2011).

The motive for these positions and campaigns, however, is scientific research done by FoEE itself or other bodies as well as FoEE office's experience with the Brussels political environment. Its ultimate concerns lie with the (ab)use of the environment and the affect it has on the people. “We fly the civil society flag in the European debate on resource use, addressing Europe’s overconsumption of natural resources by pushing for the robust measurement of Europe’s land, water, carbon and material use” (FoEE Annual Review 2011, 4). For FoEE, participatory democracy and other forms of participatory decision-making processes are the means by which to reach its “vision of a peaceful and sustainable world based on societies living in harmony with nature”.

The FoEE grassroots strategy means that it looks for local solutions in response to global problems. For example, “by building a European-wide campaign for truly transformational change in Europe’s energy production and consumption, putting community and citizen-controlled renewable energy and energy efficiency projects at the core of reaching 100 per cent renewables” (FoEE Annual Review 2011, 15). FoEE’s acceptability dimension of representativeness is based on gyroscopic and surrogate representation, combined with participatory structures that facilitate local experience input and ‘how’ to realise local responses for the people, the planet and the future.

**Greenpeace EU**

“Greenpeace exists because this fragile Earth deserves a voice. It needs solutions. It needs change. It needs action. It needs YOU!”

Greenpeace's mission is to achieve peaceful confrontation to get attention for important environmental issues. This is achieved via three ways: research, direct action and global advocacy. For Greenpeace EU, research,
raising awareness and influencing policy are the most important roles (Greenpeace EU official 2010). As staff remarks, if an environmental problem is detected (Greenpeace official 2010),

“we first want to have sufficient scientific proof of the problems and know how the process works. Then we start dialogues with companies and governments. If this all doesn’t deliver the results we want then we take action, confront companies that do not want to commit to solutions for the environment.”

In the case of the emission reductions communication, its position was guided by scientific data and results of the Intergovernmental Panel on Climate Change (IPCC), who defined the goal to limit global warming to below two degrees above pre-industrial level taken on by the EU as threshold.

Greenpeace is clear about its gyroscopic and surrogate representation and does not claim to represent its member groups and supporters via democratic participation. It also has no official position as to what participation is. Instead, its position formation is grounded in scientific knowledge, expertise and common sense. As one interviewee states (Greenpeace EU official 2010):

“I think overall the influence of all these sources [communication and participation channels for member groups and supporters] on the position of Greenpeace are not very relevant. Of course when it would be a clear indication that there is a big decline of supporters, because Greenpeace supports 30 per cent emission reductions instead of 20 per cent or 30 per cent instead of 50 per cent, if there would really be a clear indication, then of course it would have an impact. But generally speaking I think that our positions are formed, more shaped by contact with experts and professionals, research and science input, our
assessments of what is politically feasible and what not, then that our supporters have a direct say over our positions.”

Science is not only the motive for action, but Greenpeace EU also considers science and professional knowledge crucial for its specific policy goals and suggested solutions. Greenpeace has a research unit in Amsterdam and a science unit at Exeter University to provide input. It also hires external consultants to do specific research, develop a specific policy mechanism or do legal analysis. Based on this research, Greenpeace EU forms its positions, which are discussed and sent round to member groups. The exact policy goal, in this case whether a Greenpeace group pushes for 40 per cent such as in Germany or for 30 per cent such as in the EU, is discussed within the EU climate policy team and also with CAN-E at EU level (Greenpeace Germany official 2010).

The interest of individual member groups or supporters is not the priority of Greenpeace in this context, although the support of Greenpeace’s global campaigns on the ground is of course essential for carrying out these campaigns. Greenpeace does not aim to represent member groups and supporters in a promissory sense, but it has set itself a global environmental mission, which people can choose to support. Supporters are there to support the cause if they share Greenpeace’ values and approach, but they are not there to formulate policies or decide on the pressing issues. The role supporters play in Greenpeace’s organisational structure reflects this gyroscopic and surrogate representation. They are an integral part of Greenpeace and have opportunities to co-decide on ‘how’ campaigns are run, but the positions are mainly formed based on science (Greenpeace EU official 2010):

“We act on behalf of a planet in danger. Those that want to support us in the struggle can do that financially or volunteer. People who support financially can decide to withdraw their donations. This way they vote with their feet, they can decide not
to support us anymore. For those who have a very active role, who volunteer, have an educational role, or are an activist, they of course have the opportunity sometimes to think with the organisation how we should do certain campaigns but this is not [...]. And they in fact are also part of Greenpeace themselves; the volunteers do our actions abroad.”

According to Greenpeace staff, decisions on policy positions happen in different formal/informal ways each time, it is “always a bit of an organic emerging process” (Greenpeace EU official 2010). The EU unit is governed by a General Assembly, which consists of the Executive Directors of Greenpeace EU's national offices, who take care of the annual planning. The members of its board are mainly elected from among the members of this General Assembly as well as a representative of Greenpeace International.135

The position on the emission reductions communication was formed because “climate change is the biggest environmental problem of our time” (Greenpeace EU official 2010). It was informed by scientific research and agreed to by the network of Greenpeace groups to ensure internal support and coordinated with CAN-E coalition partners to increase its potential influence (Greenpeace EU official 2010):

“Formally speaking, this unit signs off all positions of Greenpeace on EU issues. However, of course we need to have support on the position throughout the European and global organisation. At the same time, we are also a member of CAN-E, so we also have to coordinate our work with them. NGOs have relatively little financial resources compared to business lobbyists and compared to governments. So we need to also combine our forces to have an influence. So there are three things, the EU unit

135 Greenpeace EU website (accessed 09/07/2012: http://www.greenpeace.org/eu-unit/en/about/Governance/).
that formally signs off the procedures, then of course we need to find internally and externally adequate support for the position. Then of course the position has to be well informed. So what we do is we have our research unit in Amsterdam, a science unit in Exeter University in the UK, who provide us with input. And then we regularly hire external consultants to do specific research, develop a specific policy mechanism that we could apply, do a legal analysis of existing legislation. We meet to discuss the position and also send it round.”

There is however no regulation as to how many people or groups have to support a position. The position formation is rather informal, and according to staff most of the time consensus or a compromise can be reached (Greenpeace EU official 2010),

“[...] but in the end Greenpeace is a global organisation, not a horizontally structured organisation, so in the end if it would not be possible to agree on a position it would be on the high level where the decision would be made. Greenpeace International or here depending on what the situation is. [In ad-hoc situations you don’t consult?] It depends. I think that formal procedures here do not always help a lot [...]”

Greenpeace EU, nevertheless, as well as other Greenpeace groups, has to adhere to the programme set at the international level, providing an international guideline and coherence of international action. Greenpeace International decides on country specific proposals and develops campaigns. The international programmes, set around specific topics and regions, decide on priorities and objectives and establish task blocks, which in turn are implemented by the EU and national offices. The decision-
making structure of ‘Greenpeace as a whole’ follows ‘mutual consultation’ in order to achieve international coherence.\textsuperscript{136}

“All National/Regional Offices, as well as Greenpeace International, clearly articulate and regularly review their long-term development plans to ensure programme and development coherence, realistic budgeting, and long-term financial self-sufficiency. These development plans are drawn up and evaluated annually in mutual consultation.”

The cooperation between EU level and national groups is increased, when the EU-office receives similar tasks to national offices at the international programme meetings. Prioritising issues is a 'complicated' process and the international programme is a kind of 'problem council' (Greenpeace EU official 2010), where groups present all kinds of positions, agree on the programme, which is then adapted by the directors of the organisations and by the Greenpeace council (made up of different representatives of boards of national organisations) (Greenpeace EU official 2010).

The formation of Greenpeace EU's specific position on the emission reductions communication involved all EU national offices and the Greenpeace EU climate and energy policy director. The latter for example worked closely with Greenpeace Germany's director for climate and energy campaigns on the policy, who also co-represents at the international climate conferences. The EU climate and energy policy director or the director of the EU-office also represent Greenpeace EU externally on this policy and report to the EU-office in meetings or emails.

\textsuperscript{136} Greenpeace International website (accessed 22/08/2012: http://www.greenpeace.org/international/en/about/how-is-greenpeace-structured/financial/).
Climate Action Network Europe

The role of CAN-E is to carry out a formalised regional cooperation, collaboration and networking of “organisations brought together by a common concern” (CAN Charter, 5f). The coordinating role of CAN-E in the interest of the climate change cause is expressed by a CAN-E official (2010): “we represent our members which are united in the cause over climate change, so we also represent the cause through our members.”

CAN-E members have administrative independence and pursue their own mandates, organisational aims and objectives, but there has to be a participatory, accountable and transparent decision-making, enshrined in the CAN code of conduct, which CAN-E has to follow (CAN Charter, 28). What unites CAN-E members is their advocacy in the interest of ‘a healthy environment’ (gyroscopic and surrogate representation) and a consistent vision. CAN-E’s surrogate representation is made explicit in CAN International’s statement that CAN member groups “place a high priority” on development that

“meets the needs of the present without compromising the ability of future generations to meet their own needs” (Brundtland Commission). CAN’s vision is to protect the atmosphere while allowing for sustainable and equitable development worldwide”. CAN-E works to prevent dangerous climate change and promote sustainable energy and environment policy in Europe. [The worldwide network...] CAN is based on trust, openness and democracy. [...] CAN’s mission is to support and empower civil society organisations to influence the design and development of an effective global strategy to reduce greenhouse gas emissions

and ensure its implementation at international, national and local levels in the promotion of equity and sustainable development.”

Member groups agree to the broader strategic and political goals as well as annual work plans at the general assembly in Brussels, whilst specific policy recommendations are on-going throughout the year. CAN-Europe has a Board of Directors, which is appointed by its general assembly. The office prepares a work plan which then gets signed off by the general assembly and the board, but “there is some leeway” (CAN-E official 2010). But the bigger strategies get signed off by the network. Moving to a 30 per cent production goal had to be signed off by the network. The general assembly looks back on what CAN-E has done, and CAN-E informs about the work plan, which members can also influence and feedback on, suggests themes and seeks agreement of member groups (CAN-E and DNR officials 2010). Member groups form the strategy of CAN-E’s work, “they are the backbone of what we do, we do not exist without our members, they are behind everything we more or less do” (CAN-E official 2010). Depending on the issues, either CAN-E or member groups will work on the policies on which they have expertise. CAN-E for example works on the Emissions Trading Scheme or on policies which are within the framework of its general policy goals. On highly technical issues CAN-E does not have any experts in its office, it asks experts from amongst member groups to work on that. Renewable energy is not something the CAN-E office really focuses on for example, but within Greenpeace or FoE there are experts, the same holds for forestry and land use change. CAN-E staff working on a policy represents CAN-E’s position in meetings, but also member groups may represent a position. Meetings are reported back via email.

139 CAN-E website (accessed 08/07/2012: http://www.can-europe.org/about-us). The mission can also be found in the CAN Charter, 5.
140 As of November 2010, the Board is comprised of 8 individuals from 8 member groups.
However, if there is a new communication by the Commission or a new policy proposal coming out which is on an issue area CAN-E already focuses on, then there is no need for CAN-E to agree on the proposal formally. Generally, CAN-E forms joint positions with its member groups before it interacts, but in many cases CAN-E already has an agreed position and so the office can move forward without the need to double-check. In ad-hoc cases, CAN-E will interact with members as long as time and resource allow.

Generally, any new position is sent through the mailing list on which member groups have a week to give feedback and comment. The position is then finalised or becomes a strategic paper. A CAN-E official comments on the issue of conflicts that (2010):

“it rarely happens. So if we have dissenting opinions then we don't have a position on that. On this policy [emission reductions] there was no problem. It actually almost never happened that we have issues.”

CAN-E formed its position on emission reductions through gyroscopic and surrogate representation based on science, principles and common sense. CAN-E, together with Greenpeace and WWF, engaged the Öko-Institut and the Institute for European Environmental Policy to explore the different options for the EU member states to contribute to a 30 per cent carbon target in-depth. Based on this analysis, CAN-E, Greenpeace and WWF summarised policy suggestions in a report. CAN-E’s policy goal of the emission reductions communication changed around 2007/08, when a new ICCP report came out. The new findings made CAN-E change their 30 per cent goal to 40 per cent by 2020. The move was mainly due to scientific elements in the ICCP report so as to be consistent with avoiding dangerous climate change; however there was in addition strategic reasoning. CAN-E and its member groups wanted to take the lead on the 40 per cent target with the European Union and there was the thought that asking for more
might help to raise the middle ground (CAN-E official 2010). Those members with the interest to get involved were involved in shaping the policy, and, according to one interviewee, there is consensus on the emission reductions communication (WEED official 2010).

Some of CAN-E’s member groups, such as Greenpeace EU, WWF-EPO and FoEE, also act with the Commission and the Parliament individually. These groups and CAN-E however, try to find a joint position, a joint outreach. Although CAN-E works with all its member groups, the core groups involved in the emission reductions communication are Greenpeace EU, FoEE, WWF-EPO, Oxfam International, Aprodev, Heal and Sandbag. Most of these are members or associated members.

Represented by EU environmental groups: The acceptance dimension

Representation is more than ‘standing in for’. Whom or what a group represents is reflected in ‘who it is’ (WWF-EPO official 2010). What a group’s philosophy is, its mission, its organisational credibility, reputation and expertise, who it speaks on behalf of, what type of group it is, its structures (statutes), its constituency is and its historical record. These factors are also the basis of choice for member groups and individual supporters when they decide which group or campaign to support. It is what motivates members and supporters to join or support a group. ‘Who a groups is’ or a group’s image also constructs the expectations of member groups and supporters. Whether a group is representative rests not only on how positions are formed and whether there is a considerable degree of participation (acceptability dimension), but also on whether members and supporters accept the advocacy group as representative (acceptance dimension).

Important for the acceptance dimension is that member groups and individual supporters who sign up to a group understand how the group or campaign they support interprets “participation” and what channels of
inclusion are available. Organisational structure and strategies matter and environmental groups come in various types and employ a variety of different strategies (environmental group officials 2010/11; see Pickerill 2003, 47 for an overview of the literature). Environmental groups tend to follow gyroscopic and surrogate representation because of the nature of their issue, described as “objective-driven nature of green thinking” (Dobson 2000, 122). Supporters thus will be inclined to support these types of environmental groups, because they have a similar ‘green thinking’.

This study thus suggests that representativeness is made up of two dimensions. The traditional assumption of representativeness is however concerned only with the first dimension, neglecting that ‘representative claims’ (Saward 2006) do not only have to be acceptable because of the position formation process (acceptability dimension), but they also have to be accepted as representing their interests by the members and supporters (acceptance dimension) (based on the definition of government legitimacy drawing on Kielmansegg 1971, 368; in Dingwerth 2007, 14). Acceptance requires no participation in the position formation. Although in promissory position formation voting is the main act of acceptance, acceptance can be expressed in a variety of ways.

Judging the representativeness of a group is predicated on what a group bases its position formation on (organisational strategies and structures), which in turn affects the indicators by which the acceptance dimension can be judged. In the case of gyroscopic and surrogate representation, the acceptance dimension is separate from the acceptability dimension, and is all the more crucial for the judgement of representativeness, precisely because the support by members and supporters has not been expressed during the formation and vote of the position.

Acceptance can be directed at a group and its missions and visions in general or at specific policy positions and campaigns. The number and amount of regular subscriptions to a group, number of volunteers, amount
of donations, number of ‘Facebook likes’ and Twitter followers, for example, indicate the general acceptance of the group’s principles and positions. Specific support can be expressed by signing offline and online petitions and campaigns, volunteering for specific issues, giving project-specific donations, taking campaign action such as writing to or ringing MPs, liking and sharing Facebook events and campaigns or tweeting about campaigns and positions.

The support by constituencies, or their acceptance of a group as well as its positions, is based on trust, organisational credibility, and reputation. Professionalism in this context is crucial in particular for gyroscopic, but also surrogate groups, because they represent claims that are rooted in expertise as well as empathy, which requires a professional understanding of the beneficiaries.

Marketing requires professionalism, but a group also has to understand the limits of media professionalisation (Frantz 2007). Groups have to be true to their mission and responsive to the views of civil society, or their credibility and reputation suffer. This vulnerability to threats to reputation serves as powerful control mechanism to keep [groups] honest” (Risse 2006, 190). Professionalism thus has to be accompanied by responsibility or accountability, in order to retain trust (CPRE official 2011).

By member groups

In umbrella networks, such as CAN-E, the expectations of member groups are different to EU groups that have members belonging to the same global organisation, such as Greenpeace. CAN-E member groups look to it for coordination, information and outreach and choose to get actively engaged when a policy is of core interest or they have experience and data to feed into a common position. Greenpeace has global positions and campaigns by default. National and local policies and campaigns are always in line with the broader policy strategy. FoEE tackles global problems with a grassroots structure promoting local solutions.
Friends of the Earth Europe

FoEE is a large, popular international environmental group with at least 700 staff and numerous volunteers in national offices and at local level across Europe (FoEE Annual Review 2011, 13). Its popularity amongst the general public, its perception as an internationally active group with a global vision and mission staying close to the grassroots are sources of trust and hence acceptance of the representativeness of FoEE's cause by European member groups, supporters and the public. It is also, what member groups and supporters will expect of FoEE.

FoEE perceives its role as both, a campaigning group as well as lobbying group. In that respect, FoEE helps to coordinate EU-wide campaigns as well as lobby EU-decision-makers on policies relevant to the group's core issues.

"We support our network of member groups with representation, advice and coordination in European and EU policy making, and by sharing knowledge, skills, tools and resources. We enable people to participate in international campaigns through local activist groups and national organisations in 30 European countries".141

FoEE has 30 member groups within Europe.142 Member groups send their senior representative to FoEE Annual General Meetings in order to participate in the decision-making of FoEE, but the individual policy officers engaged in specific policy issues are not necessarily in contact with FoEE policy officers (BUND official 2010). In the BUND for example it is the director who is responsible for the coordination with FoEE, who also sits on the board of FoE International (BUND official 2010). But even if not

141 FoEE website (accessed 08/07/2012: http://www.foeeurope.org/about/how-we-work).
142 Excluding Portugal, Romania, Bulgaria and Slovenia (did not fit with membership criteria or were not interested); beyond the EU including Switzerland, Norway, Macedonia, Croatia, Georgia and Ukraine (FoEE official 2010).
involved with FoEE directly, BUND policy staffs are aware of what FoEE stands for and what interests it represents (BUND official 2010):

“We are the active partner of Friends of the Earth in Germany. It is in this spirit that we are active. We are active for the preservation of our beautiful earth.”

Thus same vision and values, as well as thematic focus, create trust in member groups that FoEE represents their views.

FoEE is a special case, because it is an international advocacy group with a global brand name, but at the same time it emphasises its grassroots structure and decentralisation. Its member groups are autonomous and many of them were established before joining FoEE. They thus are very diverse member groups, although all have similar grassroots values. Most FoEE member groups became a member to have European representation and to be part of a like-minded European network. Beyond vision and values, the German member BUND and FoE England, Wales and Northern Ireland (EWNI) for example also share its visions of organisational structures and strategies to pursue these values with FoE. Similar to FoEE’s claim, the BUND has a grassroots structure. It was set up in 1975 as an association of numerous citizens initiatives rooted in the anti-nuclear movement and has a federal structure, with 2000 regional and local groups across the Bundesländer and 480,000 individual members and supporters. BUND is thus seen as the service provider, who facilitates the cooperation of bottom-up initiatives by its subnational member groups and volunteers. Positions can evolve top-down or bottom-up, but never against the member groups’ interest. The BUND gives autonomy to its federal member groups, who are run by volunteers. Coherence is provided through the same values and guidelines that have been set up over the years of working together, and through good communication that enables the understanding of each other’s work. Still, BUND is active for a cause which is in the interest of its members and technical issues are decided at national level by
BUND’s scientific advisory council. FoE-EWNI, founded in 1971, also defines itself as a grassroots organisation and its local groups are largely autonomous, but most work on at least some national campaigns, such as climate change. Still, unlike BUND, EWNI is seen as the national central body by the more than 200 local groups, which makes it easier for the national office to encourage local engagement in EU-wide campaigns (FoEE official 2011).143

Thus the reason national groups become members of FoEE is very much that they share the 'vision for social and environmental justice' (FoEE Annual Review 2011, 13). Member groups carry out their own independent campaigns, but join at least some of the international and EU-wide campaigns set at FoEI or FoEE level relevant to their national and local activities. On climate, FoEE member groups support the 'vision of community energy' in order to reach 100 per cent renewable energy. The FoEE strategy to make this vision work is by massively increasing the share of community and citizen-owned renewable energy and energy efficiency projects. Member groups work closely on this strategy in the form of ‘affinity groups’ to discuss problems and support each other in promoting the campaign and mobilizing people. 'Strengthening the network' of FoEE, national and local groups and individual supporters is the premise on which the vision is built (FoEE Annual Review 2011, 7). The engagement of local groups and supporters is thus the key of the strategy, creating a strong sense of vision, direction and community amongst member groups, but also amongst local groups and individual supporters. Carrying out Europe-wide campaigns such as 'the big ask' campaign for example help groups to identify with the network, because national members and their local member groups, who focus on local priorities, are tied into the broader mission and visions (FoEE Annual Review 2011, 13). This, through the experience of actively supporting the same visions and campaigns, creates a more defined basis of acceptance of FoEE's representativeness.

143 EWNI website (accessed 21/09/2012: http://www.foe.co.uk/get_involved/act_local_index.html).
Member group fees and member project contributions are often a channel of acceptance; however in FoEE they only account for eight per cent of FoEE’s income and hence are not a significant indicator of acceptance amongst FoEE member groups. The largest part of the income is from foundations (43 per cent) followed by EU operational grants (30 per cent) (FoEE Annual Review 2011, 14).

Greenpeace EU

Greenpeace staff interviewed, both at EU or national level, generally speak of ‘Greenpeace’ meaning the whole organisation as such. This reflects the approach of being ‘one’ global organisation, with one global strategy. Interviewees were aware of each other’s work, use of advocacy tools and surveys that had been carried out. Groups seem well connected and conceive each other and each other’s work under one coordinated objective. This is extremely relevant for the acceptance dimension, as it expresses the acceptance national member groups have for Greenpeace EU’s advocacy. There is awareness and clarity about what each level does, and this forms the basis for support for the general, but also policy specific, advocacy and campaigning.

Greenpeace International’s campaign focus is centring on a variety of issues, including the halting of climate change, which in turn impacts a number of other issue foci, such as the defence of the oceans, and the encouraging of sustainable trade and agriculture. The issue areas are the same for Greenpeace offices around the world, including Europe, and campaigns tend to be global or are connected to global issues, giving Greenpeace a coherent image on what it stands for to member groups and supporters independent of their location.

Greenpeace EU includes over 40 national offices and spends most of its time communicating with its member groups. Greenpeace member groups fund Greenpeace International by about 97 per cent (Greenpeace International Annual Report 2010) and that money also funds Greenpeace
EU. The national groups’ income in turn comes mainly from individual supporters and donations. Greenpeace EU thus is accountable to Greenpeace International. Nevertheless, it works in close cooperation and is responsive to Greenpeace national offices. Important channels that enable responsiveness in the EU are the EU issue groups, in which the respective policy directors of the EU office and national offices work closely together on issue-specific policies and campaigns. The intense exchange enables trust and support based on expertise and common positions. There is a strong “we”-feeling towards the activities to influence EU policy and achievements at EU level (interview Greenpeace Germany). As a Greenpeace Germany official expresses (2010): “The EU office functions best and very good.”

The exchange and contact has continuously grown closer over the last years, partly because the increased number of lobbyists in Brussels has made it more difficult for individual groups to have an impact on policies. The other reason is that EU climate politics increasingly determines national politics (Greenpeace Germany official 2010). Member groups are thus aware of and appreciate the importance of the EU offices work and their coordinated action. There are no differences in opinion within Greenpeace according to one interviewee at a national member group (Greenpeace Germany official 2010). Being used to work together with Greenpeace EU and in coalitions on climate policy generates trust amongst member groups. This trust is further based on the credibility created by learning the expertise Greenpeace EU and member groups have to offer, their strategic connections to other stakeholders, and access to policy makers Greenpeace EU provides. This includes the collaboration with CAN-E, the closest partner Greenpeace works with at EU level. Also national offices have an exchange of information with CAN-E and at times member groups have particular common campaigns on the same content (Greenpeace Germany official 2010). The long established expert
relationships in coalitions create member group trust and credibility in Greenpeace EU’s work (Greenpeace EU official 2010):

“because they are networks we used to work with, that we trust, that have expertise, that have a good connection, gives us access to policy makers, significant amount of support and credibility that helps to increase political pressure.”

Climate Action Network Europe

The acceptance dimension in CAN-E is partly expressed by the number of member groups, who have the choice of being members of the umbrella and agreeing with CAN-E acting in their name.

CAN-E is united in its shared vision; and remaining true to its vision, mission and objectives is one of the commitments CAN-E as well as its member groups had to enter as part of CAN International (CAN Charter, 8, 28). This commitment is fundamental for the trust of member groups as well as individual supporters of member groups in CAN-E’s position formation and activities. CAN-E is based on principles of accountability to its members and on transparency. Rules and codes of conduct and CAN-E’s statements should not be in conflict with the provisions of the CAN Charter or in contradiction with CAN International statements (CAN Charter, 25f).

Sharing the same vision does not mean member groups are all the same. In fact CAN-E’s member groups are very diverse, ranging from network of their own such as Heal or Aprodev over international advocacy groups such as Greenpeace or WWF to small niche-experts such as Sandbag. CAN-E also works with other organisations around issues of mutual concern, such as with the European Climate Foundation (one of the funders), the Centre for Clean Air Policy, Client Earth and the Climate Group. In addition, member groups from the same country work together on national advocacy on emission reductions, which in turn strengthens the network as well as mutual understanding. It is the climate change cause that is a common denominator for all (CAN-E official 2010). As one
interviewee explains, the 150 groups all look at this same policy goal from a
different angle. There are development groups who focus more on the
adaptation towards the negative consequences of climate change,
organisations that focus more on the renewable aspect, groups that focus
more on green jobs, and again others that are focussed on really strong
targets. But reducing the emissions is the common denominator (CAN-E
official 2010). And this is what member groups consider to be the strength
of CAN-E and which is their reason to join. The broad spectrum of expertise
and studies commissioned on specialised knowledge and shared within the
network is very much appreciated by member groups (WEED, Greenpeace
Germany and Sandbag officials 2010).

The scientific consensus, or what groups understand the scientific
consensus to be, dictates what the threats are, what the scale of action
needed is and the pace. Member groups sharing the same vision means
they also rely on scientific data, experience and common sense of their
leadership when it comes to position formation in the interest of the
environment and the people. For the specific policy goal scientific studies
or international treaties were crucial indicators also for member groups
(WEED, Greenpeace, Germanwatch, DNR, CPRE and Sandbag officials
2010). Reasons for member groups to support the CAN-E position are
climate security, energy security in the EU and the moral credibility of the
EU beyond the field of climate change. Germanwatch, co-founder of CAN-E,
is a close co-operating partner on the emission reductions policy, also
because German corporations play a destructive role with regards to the
policy goals. It is very active on this policy, because

“the EU target breaches the central article two in the UN
climate convention and is not consistent with the two degree limit.
It is important the the EU sets itself a high target and it is also in
the economic interest” (Germanwatch official 2010).
CPRE staff remark that the reason CPRE got active on the emissions issue is that “carbon emissions are probably the largest long-term threat to the countryside” (CPRE official 2011). Thus groups prioritise scientific and common sense reasons rather than member and supporter representation in their line of argument why acting is important and why they support CAN-E. In this vein CAN-E’s work is also supported by the less or hardly active member groups. As one member group official states (WEED official 2010):

“CAN-E’s work, though not WEED’s core issue at the moment, is in our interest, otherwise we would not be a member. Conflicts are less about fundamental questions, but about ‘how’ we do something. [...] Do we have a conference, a demonstration, or not. Finding a consensus works in 90 per cent of the cases. If there is no consensus, only a subset goes along. That is the advantage of a network.”

Information and transparency are key elements in facilitating support and they are considered as such by CAN-E: “CAN-Europe has more than 150 member organisations in 27 European countries. The wider and better informed group we are, the stronger our voice!”\(^{144}\) Groups make up their opinion about CAN-E through direct and media reporting on CAN-E’s activities and choose to join or continue to support the group. Therefore, communicating with reporters is an activity CAN-E invests a lot of time in. The large increase of membership since 2009 (Copenhagen run-up and after) (CAN-E Report 2010, 6) reflects an acceptance by groups of CAN-E’s widely publicised activities in response to political events.

“In 2009, climate change also saw an unprecedented amount of public interest. This time in the spotlight allowed CAN Europe to

raise its public profile, increase media presence and increase membership by seven groups” (CAN-E Report 2010, 3).

According to its own reporting, the strength of the network and trust amongst groups has grown since (CAN-E Report 2010, 11):

“As lobbying activities reached a near-frenzied peak before Copenhagen in December, our network frequently pulled together to create common positions, which meant we all became more comfortable working together. Ties between network members are now the strongest they have ever been, giving us a sound base for our joint work in 2010. This includes contributing to EU climate legislative processes, such as the communication on a -30 per cent reduction target, working with Connie Hedegaard, the Commissioner of the European Commission’s newly-created Directorate General for Climate [...].”

A number of member groups interviewed view CAN-E as one of the central actors in EU lobbying on the emission reductions issue (Greenpeace and DNR officials). Staff interviewed felt that the activities with regards to the policy raised the profile in the eyes of the constituency: “These are our members; sure that is what we are supposed to do. If we do our work well and we have some results, we get feedback from them” (CAN-E official 2010). Trust in and satisfaction with the representativeness of CAN-E as well as its professional representation was also expressed by member groups. A Germanwatch official for example comments (2010): “yes, they also have their resource problems and restricted capacities, but I think they do a good job.” The appreciation by the broader constituency, such as citizens on a whole and also by other stakeholders, depends and is more difficult to determine. Some of the work CAN-E does is not appreciated by the business community for example (CAN-E official 2010). CAN-E helps member groups with information about Brussels politics, such as when there is a need for member groups to participate in Commission
consultations individually. This knowledge and the fact that almost all staff have general advocacy group and/or civil society experience at local, national and EU level, including member groups (CAN-E official 2010), are additional factors enhancing trust.

Only 4.45 per cent of CAN-E’s budget comes from membership fees and contributions.¹⁴⁵ Financial contributions thus are not a voice of acceptance for CAN-E member groups. By far the largest contribution to the budget comes from philanthropic foundations (about 55 per cent) and about 28 per cent of the funding share from the European Commission.¹⁴⁶

**By member groups’ members and individual supporters**

The case studies find that it depends on organisational structures and strategies (including issues) what indicators are adequate to judge representativeness or rather the acceptance dimension.

For example, whilst any Greenpeace supporter knows that s/he is part of a global advocacy groups and is hence clear about what Greenpeace EU is active for, for EU umbrella groups such as CAN-E, the breadth or narrowness of the cause it represents is a consideration. If an EU umbrella represents a single cause, individuals, even if unaware of the membership and EU activities of the national groups they are supporting, are still bound to be in line with the values represented. The individual supporter is clear about what exactly a group is supporting and what issues and positions the group will thus represent at EU level. Crucially, groups can likewise be clearer about their supportership, their character and their views enhancing the ease of responsiveness. If the EU umbrella on the other hand represents a general cause, then it is important that individual supporters know the EU activities and positions their group is engaging in.

In umbrella networks, such as CAN-E, the expectations of member groups are very different to those EU groups that have members belonging to the same organisation, such as Greenpeace. CAN-E member groups look to it for coordination, information and outreach and choose to get actively engaged when a policy is of core interest or they have experience and data to feed into a common position. Only a number of groups of the large network work together at any point in time on specific policies. They moreover exchange tactics and advocacy repertoires ranging from simple feedback on the technicalities of online petitions to the efficiency poll software. Greenpeace on the other hand has global positions and campaigns. National and local policies and campaigns are in line with the broader policy. CAN-E is thus representative of its policies and the groups supporting the individual policies. Greenpeace EU’s positions on the other hand are representative of the entire Greenpeace network, as they are all aligned through the Greenpeace International and the global strategy.

Friends of the Earth Europe

Similar to member groups, FoEE supporters in the UK, Germany and across the globe are aware that they are supporting not only a European, but a global federation spanning over 70 countries that has been around for over forty years. FoEI’s earliest national group dates back to 1909 (FoEE Annual Review 2011, 13). This long time of taking actions and gaining experience “provides a backdrop of credibility and confidence with which we continue to address the social and environmental challenges facing our planet” (FoEE Annual Review 2011, 3). FoEE’s and FoE’s experience as a whole has created a credibility and a certain image of what they stand for. Supporters know whom they support, and FoEE in turn has to make sure it stays credible to the mission supporters lend their help or voice to. It is global values that national groups and individual supporters sign up to and get active for with Friends of the Earth. For example FoE-EWNI stand for

“A beautiful world: We depend on the planet, so let’s keep it in good shape. A good life: A healthy planet is one that works for people too. A
positive relationship with the environment: Acting together for the planet and everyone who lives on it.”

The reference is clearly to the earth as a whole, understanding that each individual is part of the bigger environment, for which FoEE stand. This also comes across on national groups’ new media channels of communication with supporters and the public. FoE-EWNI’s Facebook page, with its 8,458 likes and 823 shares since it joined Facebook in April 2010, states in its slogan that it is striving to “making life better for people by encouraging solutions to environmental problems”. This is not only a general, global aim, but it is also one that is following a gyroscopic representation that people express their support with. In the case of the FoEE the acceptance dimension can be judged based on the number of supporters within Europe, because there is a sense of belonging and support for the same European or rather international vision and mission.

FoEE describes itself as a bottom-up grassroots group, or as described by interviewees as an equal ‘group of like-minded’ with strong links to member groups (FoEE, FoE-EWNI and BUND officials 2010/11). The image of an EU grassroots group means that FoEE member groups and their members and supporters in turn might expect opportunities of participation as well as being kept up to date on policies. FoEE thus has to live up to its grassroots claim in its organisational strategies and structures in order to be accepted as representative by its member groups. At the same time, its gyroscopic representation means that positions are in the interest of the environment. Sometimes, the interests of the environment can be in contrast with the public’s views or even the supporters. In such cases, FoE groups will debate the issue with their supporters based on scientific reasoning (FoE-EWNI official 2011):

147 Friends of the Earth England, Wales and Northern Ireland website (accessed 05/07/2012: http://www.foe.co.uk/what_we_do/about_us/friends_earth_values_beliefs.html).
“So, for example, if we are researching just how much carbon the UK can release to keep within its fair share of a global carbon budget to prevent plus 1.5 degree rising global temperatures, that would lead to the need for very stringent reductions indeed in the UK and for us to consider options that we would perhaps not necessarily like to consider. For example nuclear power. We would need to carry out that research and have that debate with our supporters before we then change our public position.”

But grassroots for national FoE groups in particular means that their (local) member groups are independent groups of local activists who choose to act as members of FoE. Their acceptance of FoE’s global values is through their choice to be active in the name of FoE. As one FoE-EWNI official explains (2011):

“These are people who are first and foremost activists working in partnership with us. They do not do fundraising for us for example. They do not have that purpose. They have a choice of what they want to work on. We do not tell them what to work on, but they choose to work with us in partnership.”

One way to keep a close connection with the grassroots is through continuous information and updates on FoEE’s work and positions on current environmental issues. For that matter FoEE produces a number of publications with background information to the various issues it is active on (also mentioned in the annual review 2011). These are available for free online or in print and range from simple information sheets to more in-depth analysis and policy suggestions, offering a choice how and to which degree supporters like to stay informed.

Information about FoEE’s activities and participation opportunities are also transmitted through the national member groups, through personal contact, TV, radio, print, websites and social media such as
The degree of communication depends on the organisational structure of the national groups as well as on national media reporting. The UK for instance has some very visible stories on Europe, such as on 'the big ask campaign', which is a Europe-wide campaign asking for a 40 per cent reduction of emissions not only in Brussels but also the national level. In Germany on the other hand, 'the big ask' campaign has not been very actively run across the country, since it has been more difficult for FoEE to direct the information down to a more local level. This has partly to do with the bottom-up structure of the BUND, where information runs from the local to the national level and local groups see the national office as a service office rather than taking a lead from it, as is the case with Foe-EWNI (FoEE official 2011). Still, local groups in Germany carried out their own political activities in support of the common move towards renewable energies and emission reductions which are related to the big ask campaign, such as halting the construction of two new coal power plants. And of course the internet makes information available to those interested. 'The big ask' campaign has its own website, where anyone can get details about the aims and objectives of the campaign, political demands and activities and achievements by national groups as well as read the scientific study or its summary.

FoEE's 30 national member groups “represent more than 2,500 local groups all over Europe” (FoEE Annual Review 2011, 13), who are supported by individuals as volunteers or financially. Supporters thus show their acceptance of FoE and thus FoEE values and campaigns through regular subscriptions, donations, volunteering and other means. With the choice individuals make in how to express their support, they also decide on the

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degree to which they wish to be involved in FoE groups (FoE-EWNI official 2011):

“Our local group supporters [activists] do not have to pay us any money. Our local group supporters are much closer to us and we work much more closely with them in terms of developing strategy. Individual group supporters [subscribers] are people who pay us a small amount of money each month by direct debit or bank transfer. Our individual supporters who we are trying to build a better relationship with tend to be people who support what we are doing, are very time-limited and therefore they are happy to give us money to do the job for them. Of course if we do not do the right job, they can cancel their membership.”

The national member groups, such as FoE-EWNI (71.4 per cent in 2011 and 96 per cent in 2010)\textsuperscript{151} and the German BUND (70.5 per cent: 34.2 per cent membership fees and 36.3 per cent donations in 2011),\textsuperscript{152} are mainly financed by individual supporters and donations. In particular, the share of individual supporters indicates their acceptance of the national groups’ representativeness. That includes their activities at the EU level or rather FoEE’s activities at the EU level in so far as they are aware of activities and/or these are taken in the spirit of FoE, thus in line with the shared visions of social and environmental justice.

Acceptance is also expressed by the number of volunteers, since it is these who carry out the core political and conservation work at the local level. Because member groups such as the BUND are based on volunteers, they also have to be responsive to citizen interests.

“Groups work together with social and environmental movements to inspire and mobilise citizens to act, and in the past two years we have empowered more than 1,000,000 people to

\textsuperscript{151} Friends of the Earth Limited Annual Accounts (2010-2011:11).
\textsuperscript{152} BUND website (accessed 17/07/2012: http://www.bund.net/ueber_uns/finanzen/einnahmen/).
take action, both online and on the streets” (FoEE Annual Review 2011, 13).

The BUND for example cooperates politically with local citizen initiatives and sees their 'representation' as part of its role. This close cooperation in turn provides a basis for supporters' and the public's acceptance not only of the BUND, but also of FoEE and FoE as a whole. FoEE and its member groups, through a number of activities aiming to 'strengthening the network', also get in contact with local people who are not members or supporters of FoE. The Young Friends of the Earth Europe group for example ran a summer camp where they, amongst other issues, learned about climate effects by the local residents and their first-hand experiences (FoEE Annual Review 2011, 7).

A further way of expressing acceptance of FoE groups’ positions and thus their representativeness is through signing petitions. FoEE member groups for example collected 635,000 signatures demanding a phase-out of nuclear power across Europe (FoEE Annual review 2011, 5).

Additionally, in order to be responsive and enable the acceptance of its campaigns and thus its representativeness also by its constituency beyond the national member groups, FoEE either undertakes or commissions surveys. To understand which issues are important to its constituents in the field of climate change, FoEE and a coalition of national member groups, for example, initiated a survey on fuel efficiency labelling conducted in the UK, Germany and four other countries.

Greenpeace EU

It is clear to any individual supporter of Greenpeace that they are part of a global network. Greenpeace describes itself on Twitter as “an independent global campaigning organisation acting to change attitudes and behavior, to protect the environment and promote peace” (independent referring to independent from politics, political parties and
industry according to Greenpeace Germany).\footnote{Greenpeace Twitter page (accessed 20/07/2012: http://twitter.com/Greenpeace).} This sense of belonging to a global group transcends also when looking at Facebook. The ‘about’ section on the site makes clear that all groups are part of Greenpeace International or rather of one “Greenpeace” network facilitated by the international office. This is the same for national Facebook sites. The Greenpeace UK Facebook site says:\footnote{Greenpeace UK Facebook (accessed 20/07/2012: http://www.facebook.com/greenpeaceuk/info).}

“[it is about] positive change through action. Defending the natural world and promote peace. We campaign to prevent climate change, to protect oceans and ancient forests, to eliminate toxic chemicals, to stop the release of genetically modified organisms into nature, and for nuclear disarmament and an end to nuclear contamination.”

This is the same global message as any Greenpeace group puts out to its supporters and the public. In the case of Greenpeace EU the acceptance dimension can thus be judged based on the number of supporters within Europe, since members and supporters have a sense of belonging to a global group with a global mission and strategy. Greenpeace EU supporters understand that they belong to a group that is active EU-wide and globally.

Individual Greenpeace supporters, who are affiliated with Greenpeace International by donations or national and subnational groups by subscriptions and volunteering rather than Greenpeace EU, which has no individual supporters, would not expect to be involved in shaping the emission reductions policy. In fact, the link on the Greenpeace EU website to ‘support’ the group links to donations for Greenpeace as such (Greenpeace International). Supporters know Greenpeace’s decision-making structure, making it clear to them what role they play or do not play in decision-making and position formation. This is also reflected in the fact that Greenpeace EU staff has a positive sense that activities towards this policy raised the profile of Greenpeace EU in the eyes of its member groups
and supporters, despite the fact that they did not have an impact on the position directly (Greenpeace EU official 2010).

Acceptance is shown through the expression of support. There are a number of alternative ways for individual supporters and volunteers to participate and express support for Greenpeace. One obvious way to express general support is financially, whether through monthly subscription or donations. Greenpeace EU is funded by Greenpeace International. Globally, Greenpeace relies wholly on supporter subscriptions and voluntary donations of around three million individual supporters (98.7 per cent of total income in 2010) and on grant support from independent foundations (1.3 per cent of total income in 2007). Though money goes to different accounts, it goes to “Greenpeace”, not Greenpeace International or Greenpeace UK or Germany and it is made clear that it supports Greenpeace as a whole. Greenpeace EU in turn is funded by Greenpeace International. Greenpeace does not seek or accept donations from governments (including the EU institutions), corporations or political parties. It is thus effectively the supporters who provide the majority of the funding for Greenpeace EU, although they have no say on what share goes to the EU office and into which EU campaign. Being a supporter of Greenpeace by paying monthly subscriptions is therefore the most obvious way for individuals to express their general support for Greenpeace. If they no longer agree with Greenpeace’s mission and/or actions, then people who support financially can decide to withdraw their subscriptions:

“People who support financially can decide to withdraw their donations. This way they vote with their feet, they can decide not to support us anymore” (Greenpeace EU official 2010).

Another crucial way of expressing support for Greenpeace in a more targeted way is by choosing to actively engage in specific campaigns, for example as volunteer, in an educational role, or as an activist. Greenpeace activists, who support specific campaigns and actions, are not necessarily supporters that financially subscribe to Greenpeace.

Greenpeace is a campaign as well as lobby group. Its primary image amongst the public is a group carrying out peaceful, spectacular actions, generating public pressure via public actions. Greenpeace tries to influence corporations, the public and policies via its public campaigns and mass mobilisations. Lobbying is another important leg of its work. This becomes clear through its various own communication channels, such as websites and reports. Supporters can also get active in both, they can decide to get active as direct activists in campaigns, or they can engage in lobbying work themselves, such as writing letter to MPs. In that regard, Greenpeace UK for example has set up different supporter email lists, the 'Get Active' newsletter and for the activists and the lobbying network for lobbyists. Both channels for active support are communicated via the online member group and both newsletters.

Next to Facebook, Twitter, the website and blogs, volunteers have the opportunity to attend meetings and skills shares, as well as trainings for activists. Individuals can participate in campaigning and collecting signatures or they can give their signature in an act of support. Participation or the expression of support can also mean giving feedback, which Greenpeace EU can be responsive to (Greenpeace EU official 2010). Tools for feedback are personal meetings and phone conversations, but also opinion polls, the Facebook page, Twitter, some of Greenpeace EU's websites which have the possibility to leave comments, paper surveys, online surveys and blogs. One Greenpeace EU official remarks (2010):
“Personal meetings are very effective; you really get a chance to ask more in-depth questions, what if you would change this, what is the most appealing argument. Personally I like very much this focus group when you develop a position or campaign you can test it with the focus group. Where you have representativeness from different parts of society, like students, different levels of education test the idea of the campaign or the lobby you want to do.”

However, Greenpeace EU plays a slightly different role within the global organisation, focussing on EU lobbying in coordination with member groups. Greenpeace EU has no direct contact with supporters and the communication with supporters on precise EU positions instead is down to the international and national offices. According to Greenpeace staff, this is also because there are 28 different countries in the EU with 28 national debates in their national newspapers. The national member groups choose a communications line (framing of issues) that fits into this national context and that is most effective in this national context (Greenpeace EU official 2010). The Greenpeace national and regional offices are firmly rooted within the local environmental communities in the countries they operate. They maintain direct contact with the public; all Greenpeace offices can be directly contacted by phone or email. Greenpeace International maintains contacts with supporters and donors in countries where Greenpeace does not have offices.157

At the national level there is much more communication with the supporter base, since groups such as Greenpeace Germany are solely funded by supporter subscriptions and donations. Although there is no grassroots democracy structure, at this level the sense of ‘duty’ towards supporters and volunteers is much more prominent. “Credibility is our most precious asset” (Greenpeace Germany official 2010). In other words,

although key issues are decided by the national group, there is an emphasis on being accountable and responsive to supporter demands. Greenpeace Germany, for example, discusses themes and supporter responses within the team and informs supporters through the supporter magazine and the online newsletter on global, EU and national Greenpeace news. The Greenpeace Germany office keeps close contact with its supporters; supporters call the office and there is an open dialogue, where each supporter gets an open ear and can voice wishes and criticism. There are regular targeted image surveys to understand supporter opinions and their demands. These opinion surveys tend to give more general responses and are carried out by external organisations amongst members, including in-depth interviews with about 100 people. A specific survey on the 30 per cent emission reductions communication was not conducted, since this according to Greenpeace staff is too detailed. As a Greenpeace EU official explains (2010):

“You have to put this political demand in a broader campaign communication strategy. We usually test our campaign communication strategy with our supporters but not directly the policy demands that are linked to it.”

But surveys in hindsight show that supporters subscribe to the 30 per cent aim, because they give insights to how supporters view and judge Greenpeace’s engagement (Greenpeace Germany official 2010). Moreover, the policy is part of the greater combat against climate change, which is a major campaign issue for all Greenpeace groups. Greenpeace UK also informs on the EU emission reductions policy, and related policies such as the Emissions Trading Scheme (ETS) and the general EU 20/20 goals and respective global, national and local campaigns on its blog, its get active email newsletter, and through its annual review.

Greenpeace member groups are also able to actively seek feedback and news of supporters by a variety of means. National offices carry out
regular consultations and surveys of member group and supporter interests. Greenpeace EU staff explains (2011):

“This depends on the national offices who have their own fundraising and supporter policies, but many of our offices do interact with supporters, ask them what their perception of Greenpeace is, what campaigns they like, what campaigns they are less interested in. The EU office does not do it, because we do not have direct contact with supporters. We get our money from Greenpeace International. Not the role of our office like national offices.”

Although Greenpeace members know who Greenpeace is, whether it is Greenpeace International, the EU office or a national group, information about specific policy positions and political developments in that respect are important to enable individuals and groups to follow Greenpeace's work. Greenpeace EU, for example, reports on its website as well as in its annual review about policy positions and political developments with regards to the issues they are active on, including emissions. It further published a number of detailed reports on the topic of emission reductions, such as on the emissions trading scheme together with WWF. Continuous reporting also through national media channels is important to create public credibility for Greenpeace' work. For example, the Greenpeace view on the topic of the UN climate change conferences and the goal to reduce emissions on climate change and emission reductions was aired on the German public national news, next to the views of the German environmental minister (Tagesschau 12pm 16/07/2012).

Climate Action Network Europe

Acceptance by the grassroots for a EU network group such as CAN-E uniting independent member groups requires the network to be transparent and forward information about CAN-E’s work. Supporters of its national member groups such as Sandbag in the UK or Germanwatch might
not necessarily realise that their groups are members of a EU umbrella representing their interests in Brussels. Some member groups are themselves umbrellas of groups, making communication and information networks all the more vital. Groups interviewed often felt it was important to pass on information to their member groups and individual supporters. Some umbrella groups, such as the Deutscher Naturschutzring in Germany, function precisely as that EU information hub for Germany and its member groups and informs via news magazines, mailing lists and member group EU-news (Deutscher Naturschutzring official 2010 and Facebook).

The media is also an important channel to inform on policies and issues. A CAN-E official remarked that he spent the same time communicating with reporters putting out the message of his work as he did on lobbying EU institutions (2010). CAN-E reports that its media work is effective in reaching out to the public: “In 2009, climate change also saw an unprecedented amount of public interest. This time in the spotlight allowed CAN Europe to raise its public profile, increase media presence [...]” (CAN-E Report 2010, 5). The very active press work over the past two years (CAN-E Report 2010, 14) is enhancing the public profile of CAN-E as well as improving the transparency of CAN-E’s work for member groups, individual supporters and the public. CAN-E’s activities have been mentioned in a large number of European and national press articles, news wires, websites and publications (details in CAN-E Report 2010, 14).

Even if member groups do not inform their members and supporters about the work CAN-E does, they can raise awareness of their group being a member of CAN-E on their websites and in reports. Some of the less or hardly active groups in CANE-E do not point out their membership on their websites or Facebook, such as CPRE, WEED or Sandbag, though they state their involvement in European and international networks in general and
with those actively involved.\footnote{For example CPRE, WEED and Sandbag: (CPRE Annual Review 2011/12, 2), WEED website (accessed 20/07/2012: http://www.weed-online.org/about/index.html) and Sandbag website (accessed 20/07/2012: http://www.sandbag.org.uk/about/).} WEED for example clearly says on its Facebook site:\footnote{WEED Facebook page (accessed 20/07/2012: https://www.Facebook.com/WEED.Berlin/info).}

“The social and environmental effects of globalisation, demand for reshaping financial, economic, ecological and trade policies towards more justice and sustainability. WEED assesses the existing problems and their causes and advocates positive solutions. We are actively participating in national and international civil society networks, and advocacy initiatives. WEED analyses world-economic, ecological and socio-political issues, and generates studies and working papers.”

For the niche group Sandbag specialised in emission trading technologies, part of the EU emission reductions communication, the EU is its core advocacy focus. Though the CAN-E membership is not mentioned, subscribers, who are electronic followers and/or financial supporters, know about Sandbag’s EU activities through information and reports, often in coalition with other EU groups, through its website, Facebook and its newsletter. CAN-E also asks subscribers to actively engage with the EU policy by signing petitions or writing to MEP’s or Commissioners. Sandbag is information led, does in-house research and its several thousand subscribers similarly tend to be very informed individuals with an interest in expert analysis who will expect in particular to be informed about technological and related political developments (Sandbag official 2011).

Very active member groups tend to make their membership and activities explicit on their websites and often via other channels. Germanwatch, for example, also publishes an annual Climate Change Performance Index together with CAN-E, which evaluates and compares the climate protection performance of 57 industrialised and developing
countries (i.e. Harmeling 2012). In fact Germanwatch understands its role in making sure that German actors play a constructive role in the EU-context, for example by lobbying for the support of a 30 per cent target by the German government and are well informed. The Deutscher Naturschutzring, active on the energy efficiency side to the policy, similarly sees its role in informing its member groups and the public about important political events in the EU and nationally, related to environment. EU coordination is considered an essential part of its engagements, explicitly including CAN-E, and its member groups appreciate these activities according to one interviewee (Deutscher Naturschutzring official 2010). Member groups as well as anyone interested can find an extensive amount of current and archived information, including reports on the emission reductions policy by CAN-E on the Deutscher Naturschutzring website, in special issues, through its news RSS feed, through its email newsletter or through its Twitter channel ‘Umweltnachrichten’.

CAN-E is active on a single cause. This means that member groups and their members and supporters in turn are relatively clear about the issues tackled and positions put out by CAN-E, even if they are not well informed. CAN-E’s member groups support the network, because the issue is relevant to them and in line with their own cause. This means that their members and supporters are likely to know and support CAN-E’s positions. There is thus less demand to report and inform of a single cause group such as CAN-E.

**Professionalisation in gyroscopic and surrogate representation**

The differentiation of representativeness has crucial consequences for the implications of professionalisation. Firstly, the narrow understanding of professionalisation in the traditional sense of bureaucratisation carries implications primarily for groups whose acceptability dimension is based on
the traditional promissory representation. Thus if positions are formed through member participation, the loss of member influence in formal decision-making structures negatively affects the representativeness of the position, or the representative claim. In the case of gyroscopic and surrogate representation, the bureaucratisation or rather the absence of member and supporter participation in the formal position formation does not matter, since the position is formed based on scientific evidence and expertise on the ground (gyroscopic) and empathy (surrogate) and because the acceptance dimension is a separate act from the acceptability dimension.

Still, the informal communication with member groups is important in order to qualify the position formation is based on experience in the field. But crucial in gyroscopic and surrogate representativeness is that professionalisation can play a positive role for the acceptance dimension: professionalisation in new media technology facilitates the mediation – and indeed the judgement - of support. Also in the case of promissory and anticipatory representation new media technology provides additional and more fluid channels for formal and informal participation in position formation as well as channels for group responsiveness to member and supporter attitudes (Pickerill 2003, 27; Maloney 2009, 283f; Gibson et al 2004, 198).

The section below explains the bureaucratisation implications for the three gyroscopic and surrogate groups interviewed and how new media professionalisation affects their dimensions of representativeness.

Bureaucratisation and gyroscopic/surrogate representation

The traditional professionalisation, or bureaucratisation literature, expects EU groups to represent by putting forward a “relatively unmediated version of the constituents will” (promissory representation, Mansbridge 2003, 516). The EU group is then accountable to its member groups (and
they in turn to their members) in the traditional principal-agent sense. If EU groups then professionalise as detected in the literature, centralising their decision-making structures with an elite leadership remote from member groups, their positions might not reflect the preferences of their members anymore. Professional staff in EU groups would become motivated by their paid position and the survival of the organisation, rather than the representation of member interests and their needs. The fear in the literature is that members would lose power over the preferences of EU groups, which would hence fail to keep their promises and not be representative of their constituency.

Groups may also predict the positions that the members they claim to represent will agree with in hindsight, creating a reciprocal power relation and enabling continuing mutual influence between the point of position formation and re-election/affirmation of support (anticipatory representation). If EU groups bureaucratise and streamline their participation and communication and remote elite staff take decisions on behalf of members, it will be difficult for them to predict members’ preferences. Moreover, EU groups professionalising their marketing strategies and media appearance (Frantz 2007; Frantz and Martens 2006) might manipulate the preferences of members in their own organisational survival interest rather than educate members’ preferences in the interest of the original environmental mission (Mansbridge 2003, 517, 519). EU groups would create conditions of choice leading members to make choices not in their interest. EU groups would thus lose representativeness.

The assumptions in the group professionalisation literature are that groups apply modern marketing strategies to market their positions and gain support, rather than focus on bottom-up opinion formation; they employ experts who know about the issues in question but not about grassroots opinions; they employ full-time workers with business motives rather than volunteers who want to promote a cause, and organisational structures become streamlined to be more effective rather than inclusive.
(Frantz 2007; Frantz 2005). The latter includes the rise of groups with decision-making structures that exclude members from participation in opinion formation (see Saurugger 2008 for an overview, Sudbery 2003, 87; Warleigh 2001, 2004) reducing their role to financial supporters, so-called cheque-book participation (Maloney 1999). The literature assumes that internal professionalisation furthers the gap between what EU umbrella groups put forward as the opinion of civil society and what grassroots civil society opine (Kohler-Koch 2008; Saurugger 2008).

All three groups form part of the first mushrooming of EU environmental groups in Brussels (Wurzel and Connelly 2011, 214). They have full-time staff with high levels of specialisation and expertise. Offices are small (CAN-E, Greenpeace EU) to medium sized (Friends of the Earth Europe) in comparison to national offices and other lobby groups in Brussels, employing specialised policy officers responsible for different issue areas such as climate change. They also employ a number of administrative personnel responsible for the areas of external communication and media as well as finance and office management (division of labour). Staffs have professional qualifications and are generally highly educated. Policy officers tend to be educated to university degree in their policy areas and are familiar with the Brussels circuit, but they also tend to have advocacy experience at EU and/or national/subnational level, often with member groups. Administrative staffs tend to be qualified in the relevant finance, management, administration or communication subjects. Neither of the groups outsources their lobbying to agencies, but they engage in sophisticated scientific research in collaboration with research institutions and agencies.

The EU groups interviewed thus match the picture of professionalisation anticipated in the literature to some degree. The implications for the representativeness of said groups nevertheless have to be differentiated and are not necessarily all negative. Whilst the professionalisation of promissory groups can pose serious risks to their
representativeness, for the gyroscopic and surrogate groups analysed this is not necessarily the case and in fact appears helpful to the cause in most incidents.

**Friends of the Earth Europe**

The international scope of FoEE’s strategy resembled in the name ‘Friends of the Earth’ was essential to its founders, and requires the expertise and knowledge to grasp the bigger picture. FoEE forms its positions based on science and ecological and social values with an international objective. The formation of its international positions moreover relies on input from communities, and alliances with indigenous peoples, farmers’ movements, trade unions, human rights groups and others.\(^{160}\) This in turn requires a professional team that connects with and maintains relationships with these groups.

FoEE has expanded its issues and tools since its foundation. Starting out as an anti-nuclear power movement, it today spans a number of issues, such as climate change, policies that promote unsustainable consumption and production and place biodiversity protection above free trade priorities – although all are true to the original aim to create environmentally sustainable and socially just societies. This expansion is partly due to “the emergence of ever more global and social problems”.\(^{161}\) Moreover, its marketing strategies now include using big names, such as Radiohead for the European Big Ask campaign.

Member groups of the FoEE network and also individual supporters will thus expect FoEE to be professional and knowledgeable in their formation of positions and in how and with whom they form alliances. They will further expect FoEE, and FoEI as as a whole, to be able to keep up to date with scientific knowledge and pressing environmental issues in order to fulfil their original mission. This includes having professional staffing at


\(^{161}\) FoEI website (accessed 17/09/2012:http://www.foei.org/en/who-we-are/about/25years).
EU level which is able to incorporate latest environmental science, Brussels know-how as well as the diversity of its grassroots network into its advocacy and campaign strategies. The use of marketing strategies using prominent names can be helpful if member groups and supporters find it is an acceptable way to raise awareness for the cause. The repercussion of the big ask campaign and its accepted impact on for example UK legislation in the media can be interpreted as positive for FoEE’s reputation and credibility and thus the acceptance of its representativeness in the broader public.\textsuperscript{162}

\textbf{Greenpeace EU}

In its mission to represent the health of the planet and stop environmentally destructive policies, Greenpeace set up its European office in Brussels. The fact that 80 per cent of environmental legislation in the EU is decided at EU level made it necessary for Greenpeace to advocate also directly with EU institutions.\textsuperscript{163} Greenpeace EU looks at EU politics from a global perspective and aims to have certain environmental standards in the EU that can have a positive impact globally. It aims to monitor and analyse EU institutions work, expose EU policies and laws it considers deficient, and challenge EU decision-makers to implement ‘progressive solutions’. To fulfil these tasks Greenpeace EU employs 15 staff, mainly as policy officers, as well as some directing, managing and communication staff.\textsuperscript{164}

Professionalisation for Greenpeace is necessary to be able to form gyroscopic positions and promote solutions in protection of the environment. Greenpeace member groups, but also sub-national groups and supporters, expect Greenpeace to be skilful and professional in their development of strategies that combine research, advocacy and action. This also means that members and supporters, in order to fulfil these highly

\textsuperscript{162} FoE website (accessed 24/09/2012: http://www.foe.co.uk/campaigns/success_stories/gov_climate_bill.html).
\textsuperscript{163} WWF-EPO website (accessed 20/08/2012: http://www.wwf.eu/about_us/eu_environment/).
\textsuperscript{164} Greenpeace EU websites (18/09/2012: http://www.greenpeace.org/eu-unit/en/).
technical tasks, will expect Greenpeace EU to employ professional and skilled staff.

Greenpeace’ professionalism has helped the group to attain a global reputation and credibility, whilst still considered “radical” by European Commission staff (DG ENV official 2010). Particularly its professionalisation in new media technology has helped the group to expand its tools for its long-standing strategy to raise funds and engage activists in support of its campaigns and cause.

**Climate Action Network Europe**

CAN-E’s task is to coordinate positions and lobby activities both in Europe but also at the international climate change negotiations. The coordinating role by CAN-E entails mostly supporting its member groups offering logistical and informational support about policy and climate change. There is also an outreach element in its role in the sense that it talks to other stakeholders.

In order to coordinate positions and provide useful information, CAN-E member groups thus expect it to have professional staffs in the climate change policy areas, with experience in international negotiations and EU politics and policies. They further expect CAN-E to have the insight to Brussels politics which in particular members not based in Brussels find is hard to get. In line with these expectations, CAN-E employs 12 staff, including policy officials, as well as staff in the areas of members’ outreach, office, finance, and communication management and fundraising.\(^{165}\) Staff is professional and highly educated in particular in the social sciences backgrounds. Almost all have NGO and/or civil society experience and started off with local or national CAN-E member groups, or other advocacy groups. Some of the staff have also worked for EU institutions or have government backgrounds (CAN-E official 2010).

CAN-E’s professionalisation in particular of its new media technology, such as its website and intranet, has facilitated the communication of information and coordination of positions between its large numbers of member groups. The professionalisation of its media presence, both, online and offline, has moreover resulted in increased traffic on its websites and additional memberships. This is also a sign of acceptance by member groups as well as CAN-E’s work in the public.

**Professionalisation in new media technology**

The traditional professionalisation argument is based on a too narrow conception of professionalisation, which is mostly restricted to bureaucratisation (though social movement literature broadens the term professionalisation to include network structures Kriesi et al. 1995 in Saurugger 2005, 267) such as centralisation of organisational structures and specialised elite staff. It ignores crucial implications of professionalisation in new media technology for both representativeness dimensions, but particularly for the acceptance dimension.

Though gyroscopic groups do not claim to represent members, their organisational structures of representation nevertheless have to facilitate input of member group experience in order to form their positions. Depending on the group structure and strategies, different degrees of feedback and input to positions via differing formal and informal channels are appropriate and have to be valued accordingly. Here, professionalisation understood as a concept going beyond the traditional account of bureaucratisation and instead including professionalisation in new media technologies, has the potential to enhance representativeness. For gyroscopic, and indeed for surrogate representativeness, new media professionalisation is significant.

The statistics of the internet and Facebook usage express how new media technologies have entered the social and political lives of individuals. On 31 December 2011 there were 2,267 million internet users in the world.
The population estimate of the world was 6,930 million. There were 900 million active Facebook users in May 2012 that is 39.7 per cent of the world’s internet users. The population in Europe was 816.4 million, of which 500.7 million were internet users and 235.5 million were on Facebook. In other words 61.3 per cent of the European population is online and 47 per cent of the internet users are on Facebook. If ‘Facebook.com’ were a country, it would be bigger than Europe population-wise. Interestingly, there are decisive national differences with regards to Facebook usage. 84 per cent of the UK population use the internet, of which 57.9 per cent are Facebook users. In Germany on the other hand, 82.7 per cent of the population are internet users and only 32.8 per cent of them are Facebook users.

Facebook has become a major source of information and communication for people. On the one hand this means people are changing their attitudes to where and how they look for information, but it also provides new ways of engaging with issues, for example by re-posting, commenting, messaging, liking. Campaigns are shared via social media, emails and online newsletters, which users subscribe to online, which they otherwise might not have. Engagement is quick, effortless and regardless of time and place (other than requiring an internet connected device). Importantly, being able to make use of new media software on new technology devices such as smart phones further impacts information, communication and participation attitudes. Advocacy groups have to respond to the changes in society and particularly changing attitudes of communication, participation and representation. Promissory and anticipatory groups who represent members’ interests have to respond to

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**Notes:**

166 Population and internet user estimates are from 31 December 2011, Facebook estimates from May 2012 (accessed 07/07/2012: http://www.internetworldstats.com/).

167 Note that not every user on Facebook is an individual; hence the numbers are only indicative.

168 UK: population 62.7 million, internet users 52.7 million (84 per cent of the population), Facebook users 30.5 million (57.9 per cent of the internet users). Germany: population 81.5 million, internet users 67.4 million (82.7 per cent of the population), Facebook users 22.1 million (32.8 per cent of the internet users). Data from 31 March 2012 (accessed 07/07/2012: http://www.internetworldstats.com/). Note that there are national social media sites who may be more popular, such as StudiVZ in Germany or Bebo in the UK.
their demands of how they wish to voice their interests. Gyroscopic and surrogate groups particularly have to use new media to expand and align their channels of acceptance to what supporters expect. Crucially, social media can build a sense of community and solidarity.

Online channels are constantly improved, but their application by EU groups is still in its infancy and not using new media technology to its full potential. This is partly because EU groups tend to use it reactively to users demands as opposed to innovatively and experimental.\footnote{This became apparent through interviews with the groups, but also by looking at when groups started using Twitter and Facebook, as well as emails and other technologies that have been available for many years. Pickerill suggests that large more hierarchical and formalised groups are slower and less innovative in their use of new media technologies, whilst small non-hierarchical structures benefit the most of using innovative technologies (Pickerill 2004.).}

**Impact of new media technology on the two dimensions**

New media technology has an impact on both representative dimensions. On the one hand, professionalisation in new media technologies facilitates expert knowledge and case study input to issues on the agenda and policy positions from member groups, essential for gyroscopic position formation. On the other hand, new media technology is a medium through which member groups, individual supporters and the general public can express their acceptance of a group as well as its policy positions, campaigns or goals.

**New media and acceptability**

New media technology helps to create and reinforce existing networks of communication and linkages between EU member groups as well as network members (Pickerill 2003:76). The linkages also enhance the relationship between national groups and their local member groups (Washbourne 2001, group officials 2010/11). New media can thus help inclusion amongst already existing member groups and supporters (Pickerill 2003, 64). Moreover, it encourages individual staff working on policies to communicate, and spreads a sense of solidarity amongst staff in member
groups and supporters alike, reducing feelings of isolation (Warf and Grimes 1997). New media technology thus helps to facilitate local connection and coordination with EU offices as well as coordination and exchange of experiences between national member groups and with EU offices (environmental group officials 2010/11). This input and exchange of expertise in the field with EU groups is crucial to enable gyroscopic representation.

There is a clear development towards incorporating new media technology into organisational and communication structures amongst the group interviewed. Organisational structures and strategies impact on how fast groups adopt the different new media technologies and the width (access) and depth (variety) of the new media tools employed. The application of tools in policy teams moreover depends on the computer knowledge officials have (environmental group officials 2010/11).

Pickerill points out the need for groups to decide between the logic of numbers and the concentration on becoming particularly technically adept and concludes that it would be hard for a group to reconcile both the incorporation of more participants as well as complicated online actions (Pickerill 2003, 53). Her example is Greenpeace, however, this organisation actually seems to have been able to reconcile both, a huge number of supporters globally who at the same time have the possibility to participate online, volunteer and get active, if they so choose. The reality is that the majority prefer to simply pay their monthly subscriptions and let others do the advocacy and direct action. Existing studies on new media are assuming a desire for participation required for promissory representation which we do not find in all advocacy groups and certainly not in all environmental groups. Pickerill looks at environmental justice movements, who traditionally place a strong emphasis on participatory inclusion, such as Friends of the Earth England, Wales and Northern Ireland. But the emphasis on ‘what’ inclusiveness and ‘how’ this should be facilitated varies between different types of environmental groups. Inclusion can take place
via votes or other formal input, or via online participation, or direct action and volunteering. Again, the benefits of new media are assessed in terms of participatory democracy and inclusion, rather than the acceptability and acceptance dimensions. Moreover, the criticism is directed at the isolation or non-inclusion of individuals outside a group's network, but new media is considered to enhance participation within the existing groups network (Pickerill 2003, 46).

Friends of the Earth Europe

FoEE uses new media tools to supplement its formal decision-making. Most internal discussions take place and positions are formed via mailing-lists and emails, next to phone calls and face-to-face meetings. Member groups confirm the extensive use of emails for communication on policies and positions. A BUND official confirms that meanwhile over 90 per cent of his communication is run over emails rather than the phone (BUND official 2010). New media technologies provide an informal channel to exchange information and communicate and discuss issues and positions amongst FoEE and its member groups. FoEE moreover gets more general input for strategic directions and feedback on EU-wide campaigns from groups through online surveys.

FoEE is still relatively new to social media. It has developed its Facebook (joined December 2010) and Twitter use over the last years and these sites are very actively used for communication between FoEE, member groups and international groups. FoEE has Twitter groups for communication between FoEE and member groups, as well as general Facebook and Twitter accounts for external communication with supporters and the public. Twitter also facilitates the following of specific issue groups, such as the EU climate group and leading individuals. FoEE runs a very active Twitter site called ‘FOE_groups_ppl’, which is a public Twitter site for FoE groups from around the world, with 71 member groups, to which in addition anyone from the public can subscribe. FoEE moreover gets feedback from supporters through Facebook likes and messages and
through tweets and re-tweets. Still Facebook and Twitter are predominantly external communication tools, partly because Facebook is a rather public place to have internal discussions and Twitter is limited to 140 characters (FoEE official 2010).

The input and exchange of local and national data and expertise with EU groups is crucial to enable gyroscopic representation. Examples are the FoEE issue of bee decline across Europe and the Save the Arctic campaign by Greenpeace. In both cases there is an exchange between EU and national groups as well as with local groups. The emphasis in the bee campaign varies between groups. FoEE relates the issue to GM, the UK group to biodiversity and the German group to biodiversity and pesticides killing a variety of insects, including bees. The three groups’ websites cross-reference to each other as well as to national media articles providing updates on each other’s campaigns. Groups can thus exchange developments and news on the campaign to the EU office and the network and vice-versa in order to strengthen their campaign and position.

FoE set up online structures amongst national and local groups, benefitting connectivity (Pickerill 2003, 54). Today, mailing-lists, including regional and topical mailing-lists, activist-led, campaign-specific and broad issue hubs which can be set up by activists and campaigners themselves, e-petitions, Twitter and Facebook form an important part of the group’s communication and campaign repertoire. This mixed approach to new media technology also helps to provide the broadest access possible for the different type of ‘users’.

Greenpeace EU

The communication with member groups makes much use of new media technologies and has gone far beyond personal meetings and phone conversations, although these are still important tools. The EU office

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informs via emails lists, there is an intranet for communication amongst professional employees, and there are Twitter, Facebook, the website and blogs. Internally and with Greenpeace offices, mailing lists and emails are crucial tools of communication, discussion of positions and exchange of views.

The most effective and important tool for participation in the broader understanding, according to Greenpeace staff, is collecting signatures. But new media, in particular social media, is growing to be a key tool of not only communication, but also participation and expression of opinion and support, as one interviewee explains (Greenpeace EU official 2010):

“Increasingly becoming important are social networks. Greenpeace is one of the organisations that is a front runner on these social networks and involvement in campaigns. In case supporters of Greenpeace or potential supporters of Greenpeace would not like our position or campaign they can use this network to voice their concerns or positions or just not show up.”

National member groups also give feedback to Greenpeace EU and Greenpeace International via virtual discussion forums, blog posts, Twitter (and re-tweets) as well as Facebook for Greenpeace international. There is a global tweet list with “official Greenpeace tweets from around the world”, a Greenpeace staff Twitter list and issue-based Greenpeace lists such as on climate and nuclear-reactive issues. Also on a national level Twitter has become an actively used communication tool. Greenpeace UK for example has a public Twitter list for international Greenpeace groups (33 members and 17 subscribers) and one for Greenpeace supporter groups around the UK (40 members and 15 subscribers).171

171 Greenpeace UK Twitter (accessed 24/02/2012: https://twitter.com/GreenpeaceUK/lists).
Climate Action Network Europe

CAN-E relies heavily on new media technologies for its position formation. For CAN-E’s large network, emails and mailing lists are the most important communication and participation tools with member groups, next to online and phone conferences as well as phone calls (CAN-E, Germanwatch and DNR officials 2010). CAN-E uses its recently established Google-based mail system, which allows staff and member groups to share documents (Google docs) and intranet sites (Google sites)(CAN-E Report 2010, 14). Personal meetings take place mostly with member groups in Brussels or in its proximity such as the Netherlands or France, apart from the general assemblies, which are very inclusive. The lack of personal contact is a disadvantage for groups situated further away, but phone conversations, online and phone conferences, emails and various mailing lists are crucial communication and participation technologies that are used to help overcome the distance. Phone conferences can include all member groups and everyone can join and participate and are mostly used for the work on specific topics. CAN-E uses mostly Skype or calls into a phone/online conference channel. Since CAN-E tends to work with a number of groups on each different policy rather than its entire membership of 152 groups, online conferences are a convenient tool for discussing specific policies.

The decision-making on policy documents, for example, taking place throughout the year is carried out online. Statements of opinion by member groups on mostly pre-formulated positions by CAN-E are sent round via mailing lists often relatively early in the process of formulating a position (CAN-E, Germanwatch and DNR officials 2010). Expert studies are also contributed to the network and policy positions online by member groups (Germanwatch official 2010). Outside position formation, in order to make sure its work is connected to the bigger strategic and political goals in the interest of its member groups, CAN-E reports to its member groups on its activities via mailing lists. CAN-E’s member news section on its
website moreover informs the network on activities and news relevant to CAN-E policies. Beyond that, it carries out offline and online member group surveys to understand the interests of members, get feedback on its achievements and adapt and improve according to member group needs. For feedback and participatory purposes, CAN-E conducted its first online survey in 2010 (CAN-E Report 2010, 7):

“With our new network coordinator in place, CAN Europe has been able to embark on a network survey in 2010 to try to ascertain the composition, needs and expectations of our bigger-than-ever membership base. The survey was designed by CAN Europe secretariat staff and distributed to members in mid-2010. So far, the response from members has been greater than expected. Once all the surveys are complete, the results will be analysed and ready for presentation and discussion before the end of the year.”

A number of CAN-E member groups, in particular those not based in Brussels, find it is

“harder to be part of the daily tit-for-tat in Brussels. It is very easy to respond via the internet to media announcements. It is difficult to understand the 'feel' of where people are moving, harder for us to grasp the 'politics' of the debate, the human politics, which arguments are people swayed by. Membership with CAN-E has been very important for communicating that information” (Sandbag official 2011).

For these groups new media technologies are an easy channel of access to information they indeed request from their membership with CAN-E.

172 CAN-E website (accessed 03/09/2012: http://www.caneurope.org/).
New media and acceptance

New media technology also has an impact also on the acceptance dimension of representativeness. Existing networks of communication and linkages between EU and member group staff as well as supporters encourage staff to connect on policies and help create and reinforce trust and solidarity (Pickerill 2003, 76), moreover reducing feelings of isolation (Warf and Grimes 1997). Solidarity is the basis for empathy and is particularly important for the acceptance of EU groups’ activities across national boundaries.

Groups use the internet to create new channels of acceptance, by raising their profile, reach more audiences and gain media attention (see also Pickerill 2003, 71 on a short summary of examples).

Friends of the Earth Europe

New media is an important tool for FoEE to connect to individual supporters. Twitter and Facebook have been very actively used as external communication tools with supporters and the public since February 2011. FoEE joined Facebook in December 2010 and is very active since, with 1,563 likes. Anyone can post and comment and there are frequent posts of FoE groups, other advocacy groups, movements, campaigns and individuals on the site. In addition, the FoEE site has a message function for direct contact. FoEE reports on its activities at EU level as well as formal decision-making at annual general meetings. It provides links to FoE videos and other informative sources explaining environmental issues the EU is facing. It shares links of other FoE Facebook groups, including local groups in the EU. The “likes” by the FoEE Facebook group itself are an expression of who and what FoEE agrees with and supports, making its views and opinions on current issues more transparent. There is a lot of information sharing of direct action and events of other environment-related

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movements. A similar message is transpired by FoEE’s slogan on Twitter: “Friends of the Earth folk in Brussels, representing people and planet, and campaigning for sustainable and just societies and the protection of the environment.”174 On Twitter FoEE has 2,149 followers and tweeted 959 times since active. Tweets are about EU political decision-making, events, activities and direct action. Supporters have an overview of who FoEE supports or is interested in by checking out who it follows. At the same time FoEE can see what groups and people support or opine since anybody can tweet to FoEE. Media reports about FoEE are also important to help create its public image and trust. These media reports are then shared on the various FoE groups’ Facebook sites, are tweetted and shared via other new media means.

Input to support positions is greatly facilitated through online participation: “Our cyberactions give you the opportunity to be proactive and show your support for our international campaigns without leaving home.”175 Expressing support and thus acceptance online can take place for example by sending an email to policy-makers or in support of community activism, signing petitions or statements or calling on corporations to change their attitudes. All these cyberactions facilitate the support of specific actions and campaigns. A relatively new tool to express general support of the group is the option to “donate a tweet a day” to FoEE by simply signing up to Justcoz.176

New media technologies are also a channel for FoEE member groups to connect with their supporters in turn. This is particularly relevant for financial supporters, who do not engage in activist events and have less or no personal contact. Here new media enables communication and enhancing individual supporters’ awareness: “We encourage [subscribers]

to [become active in the local groups] through our online newsletters and magazines and websites” (FoE-EWNI official 2011).

Surveys, as mentioned above, are means, which FoEE uses to keep up to date with structure, size and support of its campaigns and positions. An example is the survey FoEE undertook for its 25th anniversary in 2011, when it assessed the shape and strength of its network and how it has evolved since its formation in 1986 (FoEE Annual Review 2011, 13).

A greater awareness of FoEE’s activities in Brussels and its specific positions amongst member groups plays an important part for the acceptance dimension of FoEE’s member groups. There are a number of ways through which FoEE communicates with and reports on its activities to member groups. One channel of communication is the annual review, where FoEE additionally reports on the FoEE network of national groups via the “highlights of our member groups’ achievements” section (2011), giving insights into the work of national group members from different countries. Also FoEE websites provide info on member groups, including latest tweets and newsfeeds.177

But reports enhancing FoEE’s acceptance with member group members and supporters also takes place through the web by media corporations. This enhances its expert image, and promotes its publications and credibility with its broader constituency.178

Greenpeace EU

Greenpeace prides itself as frontrunner in the application of new and social media in advocacy and campaigning (Greenpeace EU official 2010). It’s recent ‘Save the Arctic’ campaign has a novel approach to linking up all its different new media tools for one campaign and its international Facebook site is one of the most ‘liked’ and active sites amongst advocacy

groups on Facebook. Greenpeace has a global environmental vision and strategy, detecting global environmental problems and connecting as a global organisation, to which ends it utilises new media technology extensively. Greenpeace uses an extensive variety of new media tools, tailored for different users, whether staff in the EU office or in national and subnational offices, activists, volunteers, lobbyist supporters or simply online supporters, subscribers and donators.

Greenpeace EU uses a number of informal participation channels with its national member groups and Greenpeace International, in particular emails and mailing lists. Moreover it uses opinions polls, Facebook (Greenpeace International and national groups), Twitter, the comment section on its website, online surveys and virtual discussion forums as well as national opinion surveys as channels for feedback through which member groups and also individual supporters can show their acceptance or concerns. There is an abundance of ways for supporters to engage with Greenpeace International and its national and subnational member groups, donate or sign up for regular subscriptions and it is made clear that the money and engagement supports Greenpeace as a whole.  

Additionally, there are information channels such as the general online supporter magazine and tailored newsletters for each activist and lobbyist volunteers and supporters. The tailored newsletters are a response to the supporter opinions and expectations generated in an online survey sent round to the supporter network via email. The get active email newsletter is particularly tailored to Greenpeace volunteers and activists informing about national and local activities. Greenpeace UK also carries out surveys with its active supporter network, in order to understand how Greenpeace communicates with its activists via the newsletter, including content, tone and timing (Greenpeace UK survey sent out via its 'get active' newsletter in January 2012). A relatively new tool to express general support of

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Greenpeace is the option to “donate a tweet a day” to any Greenpeace group by simply signing up to Justcoz.\(^{180}\)

Moreover, Greenpeace implements global campaigns via global communication efforts, for example the ‘Save the Arctic’ campaign in 2012. The campaign is run consistently by the national groups and on the international and national Greenpeace websites. The national Facebook pages campaign for the ‘Save the Arctic’ global campaign in addition to their national foci. Generally, the Greenpeace international, UK and Germany Facebook sites all post similar information about international and national Greenpeace events, action, scientific data and studies and politics. The communication and hence the picture of Greenpeace and its work is thus very similar for all individual supporters.

Greenpeace has recently integrated a number of existing and innovative new media technologies for its ‘Save the Arctic’ campaign. It has combined mailing-lists for activists and lobbyists with a massive global online campaign on all of its websites, social media sites, and YouTube channels and with an experimental and interactive beta-campaign site where individual campaign supporters can choose an Arctic animal avatar and join a game where the individuals with most points win a trip to the Arctic. By the 22 September 2012, the campaign had received almost two million signatures and raised over £82,000.\(^{181}\)

Although Greenpeace EU does not see this as its core task, there is communication between the EU office and individual supporters and activists as well. There is the supporters' magazine, which informs about what Greenpeace is doing around Europe and globally, and for national groups’ volunteer activists there are meetings and skill shares (Greenpeace EU official 2010). The Greenpeace EU office also gets indirect feedback through its work with member groups. For example in the climate team, the respective EU director works closely with the respective Greenpeace

\(^{180}\) Justcoz website (accessed 20/09/2012: http://justcoz.org/).

\(^{181}\) Save the Arctic campaign (accessed 22/08/2012: http://www.savethearctic.org/en).
Germany director, who himself is in close contact with supporters and activists.

Greenpeace EU does not have a Facebook site of its own, but there is the Greenpeace International Facebook site, as well as national and local sites. The Greenpeace International Facebook site is one of the most active sites with amongst the most followers on Facebook. It joined Facebook in 2008, has 1.2 million members and 81,011 users are sharing posts about or mention Greenpeace International (people 'talking about this' accounts for anything in the news feed, such as page likes, posts, liking, sharing and commenting, tagging and mentioning the page). Anyone can post, comment or send messages. The site informs about international and national campaigns and is extremely actively, used not only by Greenpeace but also by users, who comment, like and share posts. National Facebook sites tend to be equally popular and busy. Greenpeace Germany joined Facebook in August 2008 and the page has 70,249 likes and 7,510 are talking about it. Greenpeace UK joined Facebook in March 2008 and the page has 86,275 likes and 9,975 are talking about it.\(^{182}\)

**Climate Action Network Europe**

CAN-E relies heavily on new media technologies also in order to live up to its own demands of openness, transparency and information, crucial for the acceptance dimension of its representativeness. For informational purposes and to increase visibility with its diverse audiences, whether member groups, supporters, decision-makers, journalists or the public, CAN-E revamped its website and broadened the range of communications tools in 2009, for both internal and external communications. This includes publishing the newsletter “Hotspot” and annual reports online. CAN-E also has Facebook and Twitter accounts, but they are still under development. It has undergone a major professionalisation of its electronic media presence


“The [new web]site was launched in late 2009, just before the Copenhagen climate summit, and is a more user-friendly tool, which we hope will reinforce our brand recognition as well as providing an information portal for our members and the general public.”

The redesign of its website included launching a new Content Management System (CMS)-based website, utilising dedicated intranet sites for members attending 2009’s final two UNFCCC negotiation sessions, upgrading the office’s IT systems, switching to Mac and moving to a Google-based mail system, which allows for easy sharing of documents (Google docs) and intranet sites (Google sites). This intranet section of the website requires a login and allows for CAN-E staff and members to post documents for editing and comment, as well as providing a forum for additional discussions apart from email lists. The intranet and Google docs are useful for example for sharing information such as reports on general assembly’s or specific policy documents that CAN-E does not wish to be public (CAN-E official 2010).

“These improved tools helped us to communicate and update our network more easily, as well as helping us greatly in our role as coordinators of EU level NGO climate work and communicating to the outside world. In 2009 we saw more media hits than ever before, evidence of our increased capacity and efficiency in communications” (CAN-E Report 2010, 8).

CAN-E uses its website and blog for communication with the constituency beyond direct member groups. On the CAN-E website there is a media section with press releases giving information about its EU work as
well as updates on related policy issues and political developments. Social media is increasingly thought of as a crucial communication tool not only with member groups but beyond, however Facebook and Twitter are still in the process of being developed further. CAN-E joined Facebook at the beginning of 2010 and has 914 likes. The message function and recommendations function are tools for feedback. The page shows posts on EU political-decision-making, reports and assessments of EU politics, events, direct action and CAN-E in the media. CAN-E also itself ‘likes’ a number of other groups, which indicates who CAN-E agrees with, giving another insight to its views. Although posts can only be published by CAN-E, the public can make comments. Press conferences, the newsletter called hotspot as well as annual reports are further important tools for communication with member groups and beyond. Interesting is that print seems to have followed electronic media, rather than the other way round and is in fact considered a backup for electronic media.

Coordinating a large network of 152 member groups across Europe makes it difficult to keep personal contact. CAN-E uses online surveys in order to be reflective and responsive to member group interests and feedback (CAN-E official 2010):

“We just did a survey on that, analysing the results. We have [152] members, you cannot call them all up. You really have to work with surveys to see what they think of the work we are doing, the activities, the products, the priorities. We did it ourselves within the office. We sent out a questionnaire by email. We got a lot of feedback, still analysing the results.”

CAN-E consistently provides feedback to member groups and informs about the results of member opinion surveys (DNR official 2010). Online surveys thus help CAN-E to stay close to member group interests and views and enhance the acceptance of its work.
Campaigning is not a core participatory tool of CAN-E, but its campaign "time to leave" in 2008 collected signatures from citizens and forwarded their messages to policy-makers and thus enabled participation.

CAN-E member groups are often themselves umbrella networks without individual supporters, such as the Deutscher Naturschutzzring, Heal or Aprodev. Since CAN-E represents a single cause, member groups are generally aware of what CAN-E stands for and its positions. Likewise, their member groups and supporters in turn are likely to be supportive, since the issue will be in line with their groups’ vision and cause. Still, here, the communication of issues and transparency is particularly important for the acceptance dimension of representativeness. The member groups’ usage of new media and electronic and paper communication tools such as reports, magazines, and newsletters, Facebook and Twitter and their blogs are crucial for raising awareness amongst supporters of their group’s EU activities in order to enable them to express or decline support and thus acceptance.

**Conclusion**

Environmental groups form their positions based on scientific research and expertise on the ground, not because members and supporters have formed and formally voted on a position. The nature of the environmental cause they represent explains why the acceptability dimension here is gyroscopic. In addition, the acceptability dimension is surrogate, because they stand in for the environment and future generations, which themselves have no voice. They form positions around topics and points of view that are not, or only insufficiently, represented in the political discourse, such as nature, biodiversity or the poor in the developing countries.

All three EU environmental and climate change groups interviewed form their policy position based on gyroscopic and surrogate
representation (acceptability dimension), relying on scientific data, expertise and experience on the ground. Expertise is the tool to reach a normative goal, which is set in a group’s mission and visions. Groups are professional in their use of scientific data and expertise. They moreover get and value the support of their member groups, individual supporters and beyond (acceptance dimension) for their position taken. The difference between the three groups is their organisational type, which has an impact on the way the acceptance dimension can be judged. For all groups the support of member groups for positions is considered important, but it varies according to the issue and member group interest to which degree this support is presented. Gyroscopic and surrogate representation is not independent from support through members and supporters. Rather than responding to direct votes on positions, these groups have to make sure that the scientific data they form their positions on is reliable, that the experience they draw on is relevant and that their arguments are in line with their group principles. If they do not follow these rules, their reputation and credibility are in danger and that in turn means loss of support and impact.

The difference between the three groups is their organisational type, which has an impact on the way the acceptance dimension can be judged. Greenpeace EU is the EU representation of an international advocacy group, whose principles are known by national member groups as well as individual supporters to be global, thus the same at international, EU or national level. In the case of Greenpeace the acceptance dimension can thus be judged based on the number of supporters within Europe, since members and supporters have a sense of belonging to a global group with a global mission and strategy. Greenpeace-UK supporters understand that they belong to a group that is active EU-wide and globally. CAN-E on the other hand is an umbrella group of a network of independent national advocacy groups. The acceptance dimension is partly expressed by CAN-E’s group memberships, who have the choice of being members of the
umbrella and agreeing to CAN-E acting in their name. However, supporters of CAN-E’s national member groups do not necessarily realise that their groups are members of an EU umbrella representing their interests in Brussels or that as in the emission reductions study, national groups represent their interests through the CAN-E network and name at EU level. Here, the communication of issues and transparency according to supporter expectations is particularly important for the acceptance dimension of representativeness. However, the examples of the Deutscher Naturschutzmring, Germanwatch and Sandbag show that their new media usage, such as websites, supporter newsletters, Facebook, Twitter and their blogs have the potential to raise awareness amongst supporters of their group’s EU activities. They thus enable their supporters to express or decline support and thus acceptance.

Another mechanism for gyroscopic and surrogate groups to ensure positions are formed in the interest of the environment and specifically the general public and future generations are public opinion polls and surveys. The aim to reduce emissions relates to climate change. Opinion surveys reveal that action against and adaption to climate change are primary concerns of the European public. Over two thirds of Europeans see climate change as a ‘very serious problem’ and almost 80 per cent believe that fighting climate change can ‘boost the economy and jobs’. Europeans see climate change as ‘the second most serious problem facing the world’, ‘more serious than the economic situation’ (TNS Political and Social 2011). Groups fighting against climate change thus form their position based on empathy with a constituency that goes beyond the member- and supportership and is in the general interest of the public. The fact that they do so thus strengthens the acceptability dimension of surrogate groups. The public opinion poll helps judge the strength of the (surrogate) acceptability dimensions in this case.
8 Conclusion

According to an important strand of the interest group literature, professionalisation of EU advocacy groups negatively affects their representativeness. According to these approaches, positions put forward by EU groups in Brussels no longer represent the interests of their members and supporters, because they have little or no say in the formation of EU positions (Sudbery 2003, 87; Warleigh 2001).

This thesis has demonstrated that the impact of professionalisation on the representativeness of advocacy groups is significantly determined by organisational structure and strategies. The theoretical contribution has been to explain the diversity of EU environmental groups’ representation structures and the related acceptance of their representativeness by member groups and supporters. Groups examined were environmental cause groups active in the public and global interest. In addition, the thesis has contributed by exploring the relationship between new forms of professionalisation in new media technology and representation (acceptability) and acceptance structures and strategies.

The empirical, theoretical and normative contributions are summarised below. In addition, suggestions for future research to build on these contributions, as well as practical advice for environmental advocacy groups and government institutions are outlined.

Empirical findings

The empirical chapters of this thesis exemplify the representative behaviour and professionalisation of EU environmental groups. The cogency of the findings has benefitted from the adoption of methodological approaches incorporating new media measures channelling
member group input and exchange of experience and research, as well as facilitating the expression of support. The fact that positions are formed not through votes and participation, but based on scientific studies, experience and principles, has illuminated the hitherto overlooked acceptance dimension of representativeness. Taken together, these insights have enabled certain existing assumptions to be challenged whilst providing evidence for a series of new theoretical insights.

The literature makes clear that the strategy of the European Commission to enhance its democratic credentials is based on the assumption that groups are representative of their members. A number of scholars believe that this strategy is doomed, because as groups become recognised, they professionalise and lose their representativeness. Yet from this perspective there is limited discussion of the relation between the organisational diversity of groups, the way they represent and what indicators make the different groups representative. Moreover, the application also does not consider how new media is applied to represent and facilitate the expression of support for a group and its positions. The aforementioned empirical enquiries give an important insight into these shortcomings through a combination of website, social media and governance document analysis of environmental groups, as well as in-depth qualitative interviews with EU groups and their member groups (chapters four, five and six). The analysis makes clear that environmental cause groups make representative claims on behalf of the environment and they professionalise not only in their bureaucratic structures, but also in their new media presence and application. The results demonstrate that since groups also represent causes, this means representativeness needs to be thought of differently.
Specifically, the results of interviews and the examination in the way new media was used shed new light on representativeness and make clear that representativeness is two-dimensional (see figure 1). They suggest on the one hand that the assessment depends on whether groups represent (human) members or (non-human) causes. Promissory and anticipatory advocacy groups representing members’ interests form their position based on participatory mechanisms, such as (re)electing the leadership and voting on positions, giving members authority over the formation of positions. Meanwhile, it is shown that environmental groups form their positions based on science, experience and principles (gyroscopic representation). Environmental groups also form their positions based on empathy with the beneficiaries, and express the voice of nature which has no voice itself in political decision-making (surrogate representation). The relevance of these insights for group representativeness and professionalisation is established in chapters five and six. These show that groups have different strategies regarding who or what they represent and crucially, that this determines what they base their positions on. If the strategy is to represent members, the structures will be participatory in order to represent members’ voices. If the strategy is to represent a cause, such as the environment (non-
human), then the structures are likely to focus on incorporating science, expertise and experience in accordance with the group’s mission in order to represent in a way that is considered to benefit the environment.

On the other hand, the acceptance of groups’ values and positions happens through separate structures and media. In groups representing members, the members express their acceptance of policy positions, group leadership, as well as the group itself, through the respective decision-making structures. But the empirical results indicate that in groups forming their positions based on science, expertise and their mission, different mechanisms express acceptance at a separate point in time to the position formation. The representativeness is shown to depend on the type of group and the breadth of the cause it represents in order to judge the acceptance dimension in gyroscopic and surrogate (cause) groups. The examples of Greenpeace EU, WWF-EPO and FoEE indicate that their acceptance dimensions can be judged by the number of member groups as well as supporters these groups have. This is because as global advocacy groups, they have a global mission and values shared by all groups, and thus understood by member groups and supporters at any level. Thus local Greenpeace supporters know who and what they support also at the EU level.

The examples of CAN-E and BirdLife Europe on the other hand suggest that the assessment of the acceptance dimension is more refined in EU network umbrella groups with independent member groups that moreover carry different names. Part of the acceptance dimension can be judged by the number of (direct) member groups, since with their membership they express acceptance that the EU group advocates their values. Acceptance by the members and supporters of these member groups in turn however is shown to depend on the breadth of the cause the EU group represents. Both CAN-E, which aims to halt climate change, and BirdLife Europe, which aims to protect birds and biodiversity, are active on single causes, unlike the European Environmental Bureau, for example,
which represents the general cause of the protection of the environment. The national member groups of both CAN-E and BirdLife Europe joined the umbrella because the latter’s single cause resembles their own values and interests. It is thus likely that their members and supporters are also in support of the cause, since they have signed up to the national group representing the same cause. Consequently, the acceptance dimensions here can also be judged by the number of member groups as well as supporters more broadly.

In the case of umbrella networks representing a general cause, such as the European Environmental Bureau, however, the situation is different. Its member groups often represent single causes. Their members and supporters might not wish to support the more general causes the EU umbrella represents. Here it is crucial the member groups’ members and supporters are aware of their group’s activities at EU level or rather their membership in the EU umbrella. Only then can their continued support be judged as the acceptance of the EU umbrella and its values and positions. However, an EU umbrella group might put forward a specific position which is in line with the single cause of a member group, in which case it would be representative of the broader member and-supportership.

Taken together, these insights have made a telling contribution not only to our understanding of the dynamics of representation, but also to our understanding of the impact of professionalisation. While a promissory group with participatory structures may potentially lose representativeness if it bureaucratises (table 2), this is shown to not be the case for cause groups, since their representativeness is based on science, experience and principles. However, in EU umbrella networks representing a general cause, bureaucratisation might impact communication structures and thus negatively affect the awareness of member group members and supporters. The latter might thus not realise that their national group is part of an EU umbrella and what this EU umbrella represents.
<table>
<thead>
<tr>
<th>Type of group</th>
<th>Bureaucratization</th>
<th>New media technology*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Promissory/Anticipatory</td>
<td>Negative</td>
<td>Positive</td>
</tr>
<tr>
<td>Gyroscopic/Surrogate: global advocacy group</td>
<td>-</td>
<td>Positive</td>
</tr>
<tr>
<td>Gyroscopic/Surrogate: network umbrella (single cause)</td>
<td>-</td>
<td>Positive</td>
</tr>
<tr>
<td>Gyroscopic/Surrogate: network umbrella (general cause)</td>
<td>Partly negative (if it leads to non-awareness of member group members and supporters)</td>
<td>Positive</td>
</tr>
</tbody>
</table>

* Note the threshold of media professionalisation (Frantz 2007)

**Table 2: The potential effects of professionalisation on group representativeness**

The analysis further demonstrates that groups professionalise their new media applications towards representative structures. The findings in chapter five and six connect the professionalisation in new media technology with the two dimensions of representativeness – acceptability and acceptance – in cause groups. Here it is shown that in general, all five EU environmental groups increasingly apply new media technology for both dimensions. New ways of eliciting feedback and input from member groups, such as emails, mailing-lists, Google docs, intranet, Skype and online conferences, enhance the acceptability dimension of groups. Moreover, the findings indicate that the communication between EU groups, member groups and their member and supporter networks is enhanced though new and social media such as Facebook, Twitter, blogs and online petitions. This enhances awareness of these groups’ activities and principles and enables individual supporters to express their support for the groups and their specific positions. The results also show that through enhanced and direct information and communication, new media has the potential to enhance sense of solidarity amongst those supporting the cause and empathy with the environment and the people benefitting from its protection.

Testimony from the interviews also reveals that social media does not merely recreate the same offline practices online. Social media can be applied in a way that enables a unique dynamic of communication between
supporters and member groups, undisturbed by interference from the
groups themselves. The example of the RSPB shows how the group
leadership was able to observe through Facebook and Twitter how and
where supporter conversations developed and what mattered to its
supporters. The observations were used to help enhance the
communication structures with groups in order to raise awareness but also
be responsive to their interests, and enabled the group to develop online
structures tailored to the ways supporters wish to engage with the group
and express support. This suggests that the concepts of participation and
representation need to adapt to behavioural changes as a result of new
media technologies.

However, the insights also confirmed certain restrictions of new
media’s potential for representative structures and strategies. For one, the
extent to which new media technologies enable representative dynamics
depends on how groups and individual staff apply the tools. The
professional application and thus the impacts on acceptability and
acceptance were shown to vary between groups. Second, they need to
vary. This is because it depends on what the member groups, as well as
supporters, expect of new media technology to do for them. EU groups
have diverse organisational structures and strategies and member groups
accordingly were shown to have diverse expectancies of the type and
degree of engagement and representative structures in place. Third, new
media technologies can only add to participatory structures in promissory
and anticipatory groups, but not replace them.

**Theoretical contributions**

The thesis makes a number of theoretical contributions to our
understanding of representativeness and the concept of
professionalisation. Insights have been provided which directly connect the
organisational structures and strategies of environmental groups with how
their positions are formed and supported. The two dimensions of representativeness (acceptability and acceptance) were then connected with a perception of how groups apply new media to support of representativeness. Theoretical contributions have been made to both the representation and professionalisation literatures on (EU) advocacy groups. The thesis connected a progressive understanding of representation with research in online and social media technology. In so doing, an interface between what were two largely unrelated research strands has been established. The thesis identifies hitherto undiscovered dynamics of representativeness which in turn change the relation between both representativeness and professionalisation. At the same time, the thesis' understanding of group representativeness is placed within, and contributes to, the wider literature on interest representation.

Many of the arguments put forward in this thesis have been informed by the traditional assumption that groups are promissory, i.e. represent members who thus have to have authority over the positions the groups puts forward (Kohler-Koch 2010, 111; Sudbery 2003; Warleigh 2001). From this premise comes another prevailing assumption that group professionalisation, leading to a loss of members’ say over EU groups’ positions, thus hampers representativeness (Frantz 2007, Maloney 2009, Saurugger 2008, Kohler-Koch 2008). The point of departure was to identify and explain the limitations of these assumptions (chapter one and two) with the initial insight of placing the underlying dynamics of representativeness in the EU professionalisation literature in a wider context of representation. The political party literature asserts that groups perform different types of representation (Mansbridge 2003) and the advocacy literature differentiates between groups representing humans and non-humans (Halpin 2006; O’Neill 2001). Combining these understandings shows that representation is structured differently according to what or whom groups claim to represent. It follows that the representativeness of groups has to be assessed accordingly.
Representativeness in promissory groups is judged by their organisational participation structures. Meanwhile, the representativeness of EU environmental cause groups is shown on the one hand to be judged based on the credibility of their science, expertise and their adherence to principles in forming positions. On the other the representativeness is judged by the degree of acceptance through member groups and their members and supporters in turn. Moreover, the initial insight from the professionalisation literature was placed in the wider context of the bureaucratisation and new media literatures. This shows that groups not only professionalise in the bureaucratic sense, they also increasingly professionalise their application of new media technologies in internal position formation and knowledge exchange as well as in external communication. Groups counteract certain bureaucratic tendencies, but importantly they gain new channels of representation and acceptance. Taken together, these conditions show that the professionalisation of cause groups frequently enhances their representativeness.

These ideas are explained in relation to the representative claim a number of EU environmental groups make. Because they represent a cause, such as the protection of biodiversity or the halting of climate change, their representation is shown to be gyroscopic and surrogate. The mission to act in the interest of the environment leads groups to take a scientific approach to their position formation. Member input is important not for the need to represent their interests as such, but to receive experience on the ground and research findings in order to strengthen the position put forward by the EU group. Gyroscopic representation structures are shown to allow for member group influence over the general direction and broader strategic decisions of the EU group. This authority is further weighted by the fact that EU groups themselves have a reason for wanting to stay close to the interests of the European (and international) group network, because there is a sense of solidarity and understanding that without the support of the network the group loses its strength.
Incorporating the typology of representation built on the progressive literature of a diversity of representation that includes gyroscopic and surrogate representation, the thesis further provides theoretical insights into surrogate representation dynamics. The underlying environmental and global values provide a strong incentive for EU groups, as well as member groups and their supporters, to act in solidarity. Rather than representing the personal interests of members, there is empathy for “the people” and for the “beautiful planet”. These shared values lead groups to form their positions based on experience and professional knowledge that furthers the objective to protect the planet, but also generates trust and thus support within a network of like-minded.

The thesis also provides additional theoretical insights into the dimensions of representativeness. The theoretical approach of using a more complex typology of representation dynamics highlights a limitation to the prevailing one-dimensional concept of representativeness. Since in promissory and anticipatory groups the acceptance of the position is expressed at the same time as positions are voted upon or leaderships are elected, this two-dimensional character has not been obvious. However, in gyroscopic and surrogate groups, where the formation of positions is based on scientific indicators rather than members’ votes, the acceptance of a group, its positions and its leadership has not been expressed by its member groups and supporters during the formation of positions. Here groups are shown to rely on other channels of feedback and support.

Chapters five and six also add another qualification to the view that groups represent members. The diversity of organisational structures and strategies of groups shows that members and supporters are equally diverse. The mission of a group gives an insight into what motivates national groups to join EU groups or individuals to join a national or sub-national member group. The representativeness of a group is not only constituted by its function in representing, but also by the choice member groups and supporters make when they decide which group to join, with
which values and representation structures (acceptance). It is demonstrated that environmental groups do not claim to represent their members through democratic participation structures. Consequently, this is not why members join. The thesis suggests that the concept of representativeness is just as much about the character of a group as it is about how it represents.

This insight has implications for the prevailing thesis of professionalisation limiting group representativeness. It is demonstrated that in addition to shared values, member groups choose to support EU umbrella networks precisely because they appreciate their professionalism in advocacy and expertise. Similarly, individuals choose to support international (or EU) advocacy groups because they trust in the expertise and professionalism of groups in their mission to represent and further shared values. This is shown to be particularly relevant to groups with the mission to represent environmental values through evidence-based indicators, rather than those representing members’ interests through membership logic.

The theory highlights the consequences of professionalisation in new media technology for gyroscopic and surrogate representative behaviour. The indicators developed for the two representative dimensions reveal that EU groups come to rely on new media technology to take advantage of the expertise and experience from their members to form strong gyroscopic positions. Beyond the formation of positions, groups also use new media to raise awareness of issues and create the necessary sense of solidarity necessary for surrogate representation but also for the informed acceptance of groups’ positions and activities. Moreover, groups use new media to facilitate the expressions of support by their member groups but also by member groups’ members and supporters.
Normative implications

Collectively, the theoretical and empirical explanations of this thesis serve to increase our understanding of what makes groups representative, and how representative behaviour is shaped by professionalisation. As a consequence, a fuller and more dynamic picture of EU environmental groups’ representativeness emerges, giving rise to a number of normative implications for democratic decision-making in the EU.

Here it is helpful to take Dahl’s concept of pluralism as a starting point for the discussion (Dahl 1978; 1999). In this framework, democracy is enhanced through the recognition of a diversity of organised interests participating in order to influence political outcomes, alongside the traditional mechanism of parliamentary or assembly votes (Czempiel and Rosenau 1992; Schulze 1994). Participation is based on the principle of democratic self-governance (Dahl 1999, 20; European Commission 2002, 5), which implies that all affected interests must have equal opportunities to represent themselves in the decision-making process of these decisions (Steffek and Nanz 2008, 10). However, there are limitations to this approach, particularly regarding advocacy groups active in the general interest, such as environmentalists, who stand less chance in their competition for voice and influence with business and professional interests (Olson 1965, 159–167).

The assumption then, as explained in chapter one, is that the European Commission, deriving its legitimacy as a bureaucratic actor substantially from a participatory conception of democracy, can enhance its democratic legitimacy by increasing access for and improving its dialogue with groups active in the general interest (European Commission 2001; Greenwood 2007; Kohler-Koch and Finke 2007; Saurugger 2008; Steffek et al. 2008). The implicit assumption is that advocacy groups are representative organisations where the leadership reflects the interests of its members and supporters. Groups channel grassroots’ interests and
opinions across the EU into Commission decision-making and thus bridge the gap between the Commission’s politics and European civil society (for reviews see Armstrong 2001; Greenwood 2007). However, a number of interest group scholars criticise this strategy, because as groups are recognised as political actors, they professionalise and lose their representativeness. Recognition is assumed to co-opt EU advocacy groups who then cease to be representative of their members, or grassroots (Kohler-Koch 2010, 111; Sudbery 2003; Warleigh 2001). The implications of this loss of representativeness are mainly considered at the system level as a deprived diversity of organised interests, creating an imbalance in the plurality of interests represented to the detriment of general interests (Saurugger 2006).

The thesis offers insights into the extent to which professionalisation affects the internal organisational representation structures of advocacy groups and their representativeness. The findings suggest that at the individual organisational level the implications of professionalisation are dependent on organisational structures and strategies, given that groups represent different beneficiaries. Whilst promissory and anticipatory groups representing members risk losing their representativeness as a result of bureaucratisation, this assertion remains largely unconfirmed in the cases of gyroscopic and surrogate groups representing a cause with the support of their affiliates. Indeed, professionalisation in new media technology has the potential to counteract bureaucratisation tendencies (Pickerill 2003) and may enhance the representativeness of those groups who rely strongly on professionalism in their advocacy and representation of a cause.

As a direct result of these insights, the exploration of environmental advocacy groups has yielded additional normative implications for the pluralism of interest representation in the Commission, and indeed at EU level. This thesis shows that the study of the impact of professionalisation on democracy through the mobilisation of participation in advocacy groups,
generated from democratic representation theory, fails to recognise the potential democratic contribution of advocacy groups. This perspective excludes gyroscopic and surrogate groups, who benefit from certain professionalisation and who are representative not because of internal participation but because of support expressed in its diverse forms. Pluralist interest representation is about recognising diverse interests, not about equal participation within groups. Gyroscopic and surrogate groups increase the diversity of interests represented, thus enriching pluralism and enhancing democracy.

The normative implications for representativeness in this thesis are relevant not only for the EU, but for any instance of general interest representation. However, the limitation of the assumption that groups represent members who have to have authority over the positions groups put forward is particularly crucial in the context of the EU political environment. Here the literature emphasises an increased remoteness between the EU leadership and grassroots. This is owed to the multilevel structure of EU decision-making. Tensions are exacerbated because groups work in confederations and networks spanning multiple political levels, nationalities and cultures, which adds new dimensions also to the position formation. The requirement of additional levels of expertise due to the particularly technical and complex nature of EU policies, however, also fortifies the argument that professionalisation will be welcomed by supporters of knowledge-based cause groups.

In addition, the extension of the professionalisation concept to include new media applications carries normative implications for participations and representation. The traditional understanding that formal structures of participation and representation carry more normative power reduces participation and representation to those who have the time and resources to actively participate and be represented. It also ignores the choices individuals and groups make with regards to the ways they choose to participate and be represented.
However, the issue of professionalisation, whilst troubling for the democratic legitimacy of the Commission’s and indeed the EU’s decision-making, may in fact stem less from the characteristics of general or diffuse interests than from organisational logic. Recognition has had similar effects for example on political parties and trade unions. Political party and corporatist literatures reveal similar trends towards professionalisation and a marginalisation of the linkage function between the EU level organisation and its local members. The implication may be that professionalisation is not a trend restricted to the particular institutional approach to advocacy groups, but may indeed be a necessary consequence of recognition due to organisational logic.

The thesis confirms a limit to media professionalisation also for gyroscopic and surrogate groups (Frantz 2007). EU groups seeking to present themselves in a more favourable light in order to attract members and supporters and creating a misleading image about their principles and values (leading members and supporters to make choices against their values) misrepresent support. Credibility and trust in groups depends as much on their professionalism in advocacy and awareness-raising as in knowing the limits to professional media and marketing performance. Critical reports in the media indicate that some groups have already crossed the line (Frantz 2007, 193). The response however is likely to be a loss of support, since the professional but credible representation of shared-values is a crucial factor motivating people to join cause groups.

It is worth noting that accepting the reality of ‘professionalisation’ in the sense of an increased advocacy focus as opposed to grassroots participation in itself is disputed. It is questionable whether there has ever been transnational cooperation amongst groups mobilising grassroots input at EU level. The assumption of a “golden era” of the ideal traditional representative organisation is contested (Fielding 2001, 28; Ward and Gibson 2009). Professionalisation of political communication might just be a myth and we are simply experiencing the continuous modernisation of
society and the adaptation of groups to resulting changes in practices and cultures, as argued in the case of political parties (Negrine and Lilleker 2002).

Through this focus on the internal representativeness of groups, the extent to which professionalisation also impacts on the diversity and representativeness of the interest representation system is highlighted. Moreover, with reference to the on-going debate over the Commission’s alleged democratic deficit, this discussion not only has resonance for a participatory concept of democracy, but also for a representative one. This is because, as Dahl suggests, there is a need for a constant supply of countervailing policy input in the space between elections in order to prevent elites or interests seeking private goods from dominating the policy process.

**Future Research**

This thesis has opened up a number of avenues for further research. The most prominent are listed below, within both the representativeness and professionalisation context.

The analysis has contributed to our understanding of how the professionalisation of advocacy groups affects their representativeness depending on organisational structures and strategies. It has given examples that show representativeness in advocacy is more diverse and dynamic than hitherto assumed. The next step is on the one hand to explore environmental cause groups in more detail and on the other hand to apply the same theoretical approach across gyroscopic and surrogate groups in other issue areas, such as animal or human rights. A particular issue arising in the debate on surrogate representation is where groups represent people of communities other than themselves, such as the North representing the South. In groups representing the voices of the vulnerable, i.e. farmers in the global South or illegal immigrants, the line between the
representation of humans and a cause becomes unclear. These groups do not represent the voices of these people directly, but interests claimed beneficial to them. Even more complicated are cases where for example women’s groups in the North explicitly claim to represent women in the South, hence speaking for other constituents without their consultation.

Furthermore, since part of the thesis has given examples of opportunities of informal communication and participation and the representation of interests through new media, it remains to be explored in-depth and at a broader level what the normative implications are for participation and representation in light of modern technology and behaviour. What does participation mean for the individual social media user? How do people want their voices heard and interests represented, as new media technology opens up new possibilities to do so? What are the implications for interest group representation?

This links directly to another field of future research. The thesis moves the emphasis away from representing as a protective and promoting measure towards representativeness encompassing ‘who a group is’ and what motivates people to join. The assertion in the literature that EU institutions are interested mostly in what groups do (functional representation), as opposed to who they are, may have particular implications for the genuine acceptance and consideration of the voices of civil society in EU interest group representation. The thesis has contributed to our knowledge of how bureaucratisation and new media professionalisation affect representativeness. The insight into the more diverse dynamics of representativeness established in this thesis have important empirical and normative implications. Future research should continue to explore how the Commission’s strategy to engage with advocacy groups affects cause groups in particular and in detail.
Benefit to practitioners

This research is of interest to environmentalists, cause groups and advocacy groups more generally, because it provides a typology and indicators to understand and judge their representativeness. This strengthens their position vis-à-vis decision-makers, but also enhances their credibility in the public and media. The findings can further used as a guide in how to improve representative structures.

A better understanding of why and which groups are representative also helps decision-makers, such as the Commission, but also other EU and national government institutions, in their task to be inclusive of the diverse voices of civil society and evaluate advocacy group input appropriately. For environment ministries or Directorate Generals, the insight is useful to strengthen their own arguments, since they can point not only to the expertise, but also the representativeness of the groups they have behind their positions.
### Appendix

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References

Adam, Frane. 2007. *Elite Networks, NGOs and Governance*. Efficient and Democratic Governance in a Multi-level Europe. Ljubljana: CONNEX.


CAN Charter. 1989?. *Climate Action Network: Our network rules and guiding principles for network governance.* [online] Available at:


Kohler-Koch, Beate and Barbara Finke. 2007. “The Institutional Shaping of 
EU-Society Relation: a contribution to democracy via participation?” 

Kohler-Koch, Beate and Vanessa Buth. 2009. “Civil Society in EU 
Governance – Lobby Groups like Any Other?” _TranState Working Paper_, 108 
(2009).

Kohler-Koch, Beate, and Berthold Rittberger. 2007. _Debating the 
Democratic Legitimacy of the European Union_. Governance in Europe. 

Kohler-Koch, Beate, and Christine Quittkat. 2009. “What Is Civil Society and 
Who Represents Civil Society in the EU? — Results of an Online Survey 

Parliament.” _European Integration Online Papers_ 1 (9).

Kohler-Koch, Beate. 2007. ‘The Organisation of Interests and Democracy in 
the European Union’. In _Debating the Democratic Legitimacy of the 
Lanham: Rowman and Littlefield.

Kohler-Koch, Beate, 2008. Representation, representativeness, and 
accountability in EU-civil society relations. In: _CONNEX Final Conference: 
Efficient and Democratic Governance in a Multi-Level Europe_. Mannheim, 
Germany 6-8 March 2008.

Kohler-Koch, Beate. 2008a. Does Participatory Governance Hold its 
Promises? In: _CONNEX Final Conference: Efficient and Democratic 
Governance in a Multi-Level Europe_. Mannheim, Germany 6-8 March 2008.

What Role for Civil Society for What Kind of Europe?” _Policy and Society_ 28 


of Civil Society in EU Accountability.” _West European politics_ 33 (5): 1117-
1141.

Kristan, Primož. 2007. Professionalisation of Non-governmental Sector: Are 
Civic Associations Becoming Elitist? In _Elite Networks, NGOs and 
Governance_, ed. Frane Adam, 7:48-63. CONNEX. Ljubljana: CONNEX.


Pickerill, Jenny. 2004. ‘Rethinking Political Participation: Experiments in Internet Activism in Australia and Britain’. In Electronic Democracy:


