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NHO in Europe

A Study on an Interest Group's Choice of Lobbying Channels and Strategies in the European Union

Bachelor's project in European Studies

Supervisor: Carine S. Germond

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Abstract

This paper studies how the Confederation of Norwegian enterprises (NHO) lobbies the European Union. The study will look on the European Union's social policy, and funds for research and innovation. To do this, the thesis will be based on NHO's preferred lobbying channels and strategies. The thesis explores two case studies: the Lisbon Strategy and Horizon 2020. The lobbying channels looked at are BusinessEurope, NHO's office in Brussels and the national government. Strategies looked at are voice versus access, informational lobbying, and provision of technical expertise. The thesis concludes that NHO prefers using its umbrella organisation BusinessEurope as the main lobbying channel but uses the national government as a lobbying channel as well. Additionally, NHO concisely uses informational lobbying, and the theory of access as its preferred strategy. A surprising finding in the thesis was the lack of literature on NHO's Brussels office as a lobbying channel during the negotiations of the Lisbon Strategy and Horizon 2020.

Sammendrag

Denne oppgaven tar for seg Næringslivets Hovedorganisasjons (NHO) lobbyvirksomhet mot den Europeiske Union. Oppgaven vil se på NHOs lobbying inn mot den Europeiske Unions sosialpolitikk og dens finansiering av forskning og innovasjon. For å gjøre dette vil oppgaven ta utgangspunkt i NHOs foretrukne lobbykanaler og strategier. Oppgaven sammenligner to casestudier, Lisboa-strategien og Horisont 2020, og ser på NHOs bruk av kanaler og strategier i hvert tilfelle. Lobbykanalene som ble sett på er BusinessEurope, Brussel-kontoret og den norske regjeringen. Strategier som er sett på er «voice» mot «access», informasjonslobbying og tilbud av teknisk ekspertise. Oppgaven konkluderer med at NHO foretrekker å bruke paraplyorganisasjonen BusinessEurope som den viktigste lobbykanalen, men bruker også den nasjonale regjeringen som en lobbykanal. I tillegg bruker NHO konsistent informasjonslobbying og teorien om tilgang som sin foretrukne strategi. Et overraskende funn i oppgaven var mangelen på litteratur om NHOs Brussel-kontor som lobbykanal under Lisboa-strategien og Horisont 2020-forhandlingene.

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List of Abbreviations

Commission	The European Commission
EDI	Employee-driven innovation
EEA	European Economic Area
EU	European Union
H2020	Horizon 2020
LO	Norwegian Confederation of Trade Unions
NHO	Confederation of Norwegian Enterprises
OMC	Open method of coordination
Parliament	The European Parliament
UNICE	Union of Industrial and Employers' Confederations of Europe

1. Introduction

Lobbying has become an important part of the European Union's (EU) legislation process. Numerous interest groups are organised on the EU level in different collective entities to protect and promote their interests (Greenwood, 2011, p. 11). Even interest groups in countries that are not part of the EU, like Norway, are still organised at the European level. This is because the EU makes legislations which these countries must apply. With the signature of the European Economic Area (EEA) agreement in 1992, Norwegian actors outside the government saw the importance of access to EU policy makers to get information and to influence policy that would affect Norway or the market (Eliassen & Peneva, 2011, p. 2016). The Confederation of Norwegian Enterprise (NHO, the main Norwegian organisation), has lobbied in the EU since the 1970s. NHO had already set up an office before the signing of the EEA-agreement, and throughout the 1990s, it was joined in Brussels by other interest organisations like the Norwegian Confederation of Trade Unions (LO) and the Norwegian Association of Local and Regional Authorities (Eliassen & Peneva, 2011, p. 16). As Norwegian enterprises became more dependent on the European market and had to implement EU legislations, the importance of representation in the EU became more prominent.

NHO's lobbying concerns several policy fields but it has a particularly important stake in two areas: social policy and research and innovation. These two areas are relevant to NHO as its members rely on good social policy agreements to set the right terms for their employees, as well as it is important for its members to be aware of funding opportunities and investments. Gerda Falkner, professor in European integration, explains the European social policy as "[...] actions that fall under the so-called 'social dimension of European integration' (that is, any acts carried out under the social policy chapter of the Treaty), policies targeted at facilitating the freedom of movement of workers in the social realm, and, last but not least, action to harmonize the quite diverse social or labour law standards of the members states, whatever the treaty base" (Falkner, 2016, p. 270). NHO also has an interest in the research and innovation funds provided by the EU. The EU supports research and innovation because it helps the EU "compete globally and preserve [its] unique social model" (European union, n.d.). The Treaty of Lisbon aimed to strengthen the EU's actions in the field of research and therefore created a European Research Area. The aim was to establish the EU as a "leading knowledge-based economy" (Eur-lex, n.d.).

This paper aims to explore how NHO uses different lobbying strategies to get access, influence, and information, and how NHO operates on a national and European level. The thesis will focus on two EU policy areas: social policy, and research and innovation policy. Thus, the research question chosen for the study is:

How does NHO lobby in the European Union's social policy and funding for research and innovation?

Two sub-research questions were added: (1) "What channels and lobbying strategies does NHO use?" and (2) "to what extent does NHO favour one lobbying channel/strategy to another".

NHO is a relevant and important lobby group to look at because it represents a large group of businesses with different interests and objectives. Additionally, it is noteworthy to look at a Norwegian lobby group, because Norway is a country that is not entirely outside of the EU, but not inside either. NHO as a lobby group can influence and access information

which the Norwegian government may not have the same ability to do because of the missing representation in European institutions. Nevertheless, NHO as a Norwegian lobby group, may struggle more to lobby inside of the EU, compared to other lobby groups that come from member countries. Norway has a special position in the EU, and it is therefore valuable and relevant to examine how NHO uses this position to gain access.

The thesis is an explanatory study; it will look at *the ways in which* NHO lobbies, and not at the outcome of the chosen lobbying strategies and channels. Explanatory studies look at cases and what causes the cases (Moses & Knutsen, 2019, p. 36). The purpose of the thesis is to explain NHO's process of lobbying in the EU. It explores which channels and strategies NHO uses in the lobbying process. This thesis aims to contribute to the still relatively sparse existing research on Norwegian lobbying groups. The research has focused primarily on the lobby techniques utilized by interest groups (Eliassen & Peneva 2011, Gullberg 2008, 2010, 2015). Further research that has been done on the topic are several Norwegian master theses which have studied organisation on EU level versus Norwegian level (Larsen 2009, Holte 2011, Ellingsen 2012). These theses included NHO as one of the interest groups they researched. This study will be based upon this former research. Additionally, this study relies primarily on online-accessible primary sources. It uses sources from NHO's webpage and newsletters, as well as documents from the EU institutions.

The thesis will look at two case studies, namely: the Lisbon strategy and Horizon 2020 (H2020). The focus will here be on the channels and strategies that NHO uses. The thesis will look at why NHO chooses various strategies and channels. Qualitative studies can be limited to case studies and aims to get an understanding of a topic (Tjora, 2018, p. 24), and ask questions about the society's structure, something that is often taken for granted (Tjora, 2018, p. 29). This study will therefore be a qualitative comparative case study. The case studies are relevant to the research question because both cases have had influence on NHO's members and have been important for NHO to get influence on and access to the EU. Case studies are relevant and necessary for this thesis as they give in-depth perspectives to the lobbying process. Further, it makes more sense to explain a process through examples, instead of just the theory, to make it easier for the reader to follow. By comparing these two cases, the thesis aims to explore different choices of channels and strategies in NHO's lobbying to the EU. Additionally, the thesis aims to acquire different perspectives on NHO's choices. The case studies can be converted to look at how NHO lobbies the European Union on a general level.

The thesis is organised as follows: section 2 will describe the empirical background of NHO. Section 3 will look at the conceptual framework of lobbying channels by describing the Brussels route and the National route. Section 4 will explore the theoretical framework of lobbying strategies. Section 5 and 6 examine the two case studies of H2020 and the Lisbon Strategy. Section 7 discusses the case studies and gives concluding remarks. The thesis will conclude by stating that based on the two case studies, NHO prefers BusinessEurope as a lobbying channel, and informational and direct lobbying as a lobbying strategy.

2. The Confederation of Norwegian Enterprises

NHO consists of 10 regional unions and 16 national unions and has over 27,000 member companies. It is the largest interest organisation for enterprises in Norway. Together the member businesses contribute to around 40 percent of the economic value in Norway

(NHO, 2018). NHO has a central national office and regional offices, as well as an office in Brussels. Its goal is to strengthen the business sector and contribute to forming the future (NHO, 2018). The members have trustees that represents the members' interests in boards, councils, and committees, and they also decide in which direction NHO should go. NHO is also a part of Norway's wage negotiation and advises its members in employee policy (NHO b, n.d.).

NHO Brussels is the division that focuses on the lobbying towards the EU and manages the office in Brussels. It aims to influence decisions that are made in the European institutions, and to inform its colleagues in NHO about EU and EEA-matters which the organisation is working with. NHO's interest in European policies and legislations is motivated by economic concerns, and thereby the EU has a major influence on the Norwegian economy (Holte, 2011, p. 59). The reason for establishing the NHO Brussels office is that the Norwegian business sector is a part of the European business sector through the EEA Agreement and hence access to the internal market. Policies and legislations made in Brussels affect the daily life of Norwegian enterprises, and NHO's presence in Brussels makes it possible for it to promote its members' interests and be a part of the decision-making process (NHO a, n.d.).

Because NHO represents many members, NHO Brussels operates more on a general level, and its work in Brussels and towards the national government is based on this. It follows the cases that are relevant for BusinessEurope, NHO's umbrella organisation. The reason for this is that if it focuses too much on small cases, some of its members might not see the use of having representation in Europe, nor see the importance of lobbying towards Europe (Larsen, 2009, p. 66). NHO is directed by its members, with a hierarchal structure built up by two pillars: the 15 regional unions and the 21 national unions. These pillars represent the employers in Norway. NHO Brussels is affected by this dual pillar structure. NHO centrally sets the policy and what it is going to promote into the EU. Representatives from central NHO, instead of the Brussels Office employees, are part of different sub-committees in BusinessEurope. Because the members of NHO set the Brussel agenda for NHO, it is vital that NHO Brussels provides enough information about new policies and legislation. Hence, information collecting is looked upon as one of its most important tasks (Holte, 2011, p. 58).

3. Lobbying Channels

The Lisbon Treaty was signed in 2007 and formalized channels of communications between interest groups, national governments, and European institutions. EU saw the importance of social partners and its role because it had been an important part of the policy making up until this point. The Social dialogue established that before the European Commission (Commission) adjusts or changes anything about the social policy, social partners must be consulted, enabling the interest groups more power in the legislation process (European Parliament, 2020).

The distribution of power between the institutions, the national states and the interest groups is called the theory of multi-level governance. The base is that power is distributed on different levels. The EU is a prime example of this theory, because the national state, and the regional and local authorities are sovereign, but they choose to give up some of its sovereignty to the European level in trade for a membership in the EU and all its benefits. Different policy areas are therefore distributed on different levels (Eising, 2004,

p. 215-216). Justin Greenwood explains the European policy process as a “multi-level character” (2017, p. 26) because of the various levels interest groups can use to assert influence. The EU consists of different institutions, for example the Commission and the European Parliament. Because of the divided power in the EU, it also means that there are several channels that interest groups can use. Greenwood argues that this multi-level character gives opportunities for outsiders, as well as it restricts insiders because of the pluralistic effect and the limitations of institutions to dominate (Greenwood, 2017, p. 53).

This thesis will use the Commission’s definition of lobbying: “all activities carried out with the objective of influencing the policy, formulation, and decision-making processes of the European institutions” (European Commission, 2006, p. 5). Greenwood divides the ways in which lobbying groups can do lobbying in the multi-level EU into two main groups: “The Brussels route” and “The National route” (Greenwood, 2017, p. 27). NHO uses both levels as means of channels; it uses the Brussels route through its office and representation in Brussels and its membership in BusinessEurope, and the national route through its lobbying in the Norwegian government. Therefore, one can argue that NHO has three main channels of lobbying in the Multi-Level governance. It lobbies on the national level through the Norwegian government, on the European level through its office in Brussels, and on an interest group level through BusinessEurope.

3.1 The Brussels Route

3.1.1 Office in Brussels

All the European institutions have main offices located in Brussels, and the different buildings are known for short distances between them, meaning that interest groups have easy and quick access to all institutions located in the European Quarter. The Commission is perceived as accessible and has promoted dialogue with interest groups since 1958. The Commission urges interest groups to establish contact with it. This is presented in “The Open and Structured Dialogue with Interest Groups” which was initiated by the Commission in 1992 (Larsen, 2009, p. 18). Therefore, it is vital for interest groups to have an office located in Brussels, an office which can establish and maintain a relationship with the European Institutions, as well as other stakeholders. NHO’s office in Brussels was the first Norwegian interest group office to be established in Brussels (Eliassen & Peneva, 2011, p. 15). Today the office is managed by NHO Brussels and works as a service office for all of NHO (NHO a, n.d.).

Collecting information is one of the important tasks the office has, and the information is sent directly to its offices in Norway which distributes the information to its members. The office in Brussels distributes information through weekly newsletters and teaches its members about the Brussels system. Larsen claims that the office in Brussels has adapted and progressed in line with changes in the European system over time (Larsen, 2009, p. 40). She claims that as new policies and directives are established in the EU, the office must adapt and therefore change or revise its strategies. When the roles of the institutions have changed, the office’s approach towards the institutions changes too.

The office works towards the European institutions, and it gives input to the Commission and European Parliament in legislations that affect NHO’s members, for instance social policy legislations. Larsen explains that the Commission is the main institution that NHO lobbies towards, but that the European Parliament also is viewed as an important contact

(Larsen, 2009, p. 41). The Commission is the main initiator of legislation and therefore important for all interest groups. After the Lisbon Treaty in 2007, the European Parliament became co-legislator and gained importance for interest groups (Cini & Borragán, 2013, p. 6). Another important task for the Office is to facilitate contact and set up meetings between its members in Norway and actors and institutions in Brussels. The employees at the office sometimes also have meetings with the institutions on their own (Holte, 2011, p. 55).

3.1.2 Membership in BusinessEurope

One can distinguish between national interest groups and EU interest groups (Eurogroups). BusinessEurope is perceived as a Eurogroup because it is composed of national associations and is typically a higher order associate than its members, when representing their interests (Eising, 2013, p. 187). According to Greenwood, BusinessEurope is one of the key organizations in the Social Dialogue (Greenwood, 2017, 51).

BusinessEurope was established as Union of Industrial and Employers' Confederations of Europe (UNICE) in 1958 and the aim was to track political consequences of the community after the Treaty of Rome (Eliassen & Peneva, 2018, p. 15). In 2007, UNICE changed its name to BusinessEurope – The confederation of European Business. The visions of a central industrial federation, a competitive industrial policy, representing national business confederations to the European institutions and solidarity between national business confederations are today still political goals BusinessEurope strives to achieve (BusinessEurope, 2019). Currently, BusinessEurope has 40 members from 35 different countries. The members are both from the EU and from the European Economic Area countries including NHO (BusinessEurope, 2019). Eliassen and Peneva argue that a membership in BusinessEurope is an important part of the European strategy from the employers' side (Eliassen & Peneva, 2018, p. 15). BusinessEurope is perceived as more influential than NHO on a European level because of more members, unique insight in the Business sector, and because it is recognized as a Eurogroup which gives an easier access to European institutions through the Union's committees (Eising, 2013, p. 187).

NHO participates in four of BusinessEurope's governing bodies: Council of Presidents, Executive Bureau, Executive Committee, and Committee of Permanent Delegates. The Council of Presidents consists of all the presidents from the member organisations in BusinessEurope and is the highest governing body. It meets twice annually. NHO also participates in BusinessEurope's committees and working groups, for instance the Economic and Financial Committee, and the International Relations Committee. The committees usually have working groups as sub-committees, and work policies in the EU, and negotiations between politicians and the civilians (NHO c, n.d.).

When NHO tries to promote a European case, it firstly works towards BusinessEurope before moving on to European institutions (Holte, 2011, p. 54). NHO gets most of its information about new legislations in the Commission from BusinessEurope, so BusinessEurope also works as an information tool for NHO. Furthermore, NHO can also influence the consultations rounds in Brussels through BusinessEurope as BusinessEurope is encouraged by the Commission to bring input to the discussion. Therefore, NHO can give input on matters to BusinessEurope which again will be taken into the discussion with the Commission (Holte, 2011, p. 56). BusinessEurope lobbies towards the Council of the EU by contacting the Presidency with its agreed agendas 24 months before the Presidency takes office, so BusinessEurope can be a part of the Presidency's programme from the beginning

(Greenwood, 2017, p. 29). Because the political structure in the EU can be characterised as a multi-level governance, interest groups like BusinessEurope have several gateways to lobby through.

Holte (2011, p. 9) has simplified this structure into a hierarchy of four institutions that BusinessEurope can try to lobby into. Firstly, a legislation is assessed by the Commission through a consultation green paper or white paper. Secondly, when the proposal is finished, the Commission sends it to the European Parliament or the council of Ministers, who formally discuss the proposal. Thirdly, if the Parliament or the council of Ministers do not agree, the legislation proposal is sent to a committee of mediators where representatives from the Commission also participate. The committee tries to achieve a compromise between the two institutions. Fourthly, the negotiated proposal is sent back to the Parliament and Council of Ministers who pass it (Holte, 2011, p. 9). BusinessEurope can lobby all these steps to get its policies into the new legislation.

3.2 The National Route

The use of a national route is based on how much influence a nation has on a European level (Greenwood, 2017, p. 28). When the Council of the European Union sets the agenda for its meetings, the agenda is chosen by the member states. These agendas are often influenced by national interest groups that lobby towards their national government to get their interests on the agenda. Scientists therefore argue that indirect lobbying of the council through member states, has become the favoured route of lobbying for interest groups because the Council portrays itself "as an institution where no lobbying takes place". The Secretary tends to refuse requests for meetings and information by interest groups, which makes the national route "easier" for interest groups when it comes to the European Council (Greenwood, 2017, p. 29).

Because Norway is not a part of the EU, but only a part of the European Economic Area, the country has no formal representation in European institutions. Therefore, NHO prioritise lobbying through the European route, but that does not mean that the National route is less important. Norway participates in the internal market through the EEA agreement, which means that most of the internal market's legislations and regulations is implemented in Norway, but with several limitations to influence the legislations and regulations that are implemented (Gullberg, 2015, p. 1531). Norway can influence the EU in the early stages of the decision-making process. It is done by having national experts in the committees in the Commission. According to EFTA's website, Norway has 43 national experts in the Commission distributed in different committees (Vandeput, n.d.). As an EEA country, Norway may also address the Commission, the European Parliament, and the Council of Europe through formal letters, and Gullberg states that the lobbying is most effective if it is done when the Commission is preparing legislations. Furthermore, Norway also has an EU mission with an office in Brussels that represents Norwegian interests towards the European institutions (Gullberg, 2015, p. 1535).

4. Lobbying Strategies

Jan Beyers (2004, p. 213) divides influence strategies into two main sections: *voice* and *access*. Voice suggests public indirect strategies, while access is inside lobbying, thus lobbying towards decision makers and constitutional institutions. Access strategies are

strategies that take place where political bargaining is happening and is only partially visible to the public. Beyers defines it as "the exchange of policy relevant information with public officials through formal or informal networks" (Beyers, 2004, p. 213). Voice strategies are strategies that try to engage and involve the public and use their support to have a voice in political decisions. It is defined by Beyer as "activities taking place in various public spheres, an arena where the communication among societal interests, policy-makers and citizens becomes visible to a broader audience" (Byers, 2004, p. 213).

Voice is an indirect form of lobbying as the information travels from the interest group to the policy makers indirectly. This makes indirect lobbying, or the voice strategy, less suited for specific interests, but interest groups are still using this as an important strategy because it might be easier to get the interest group's message across when they show that they have public support. Though, interest organisations have a responsibility of making sure that the information that the public acquires is correct. This might prove difficult because the public only has limited resources of information through the media. However, this makes the voice strategy good for choosing the most important information that the interest group want to convey that fits its values. Beyers also divides the voice strategy into two different main politics: *information politics* and *protest politics*. Information politics aims to inform the public, but at strategic decision points, so that the information will get to key policy makers or specialized constituencies outside the decision-making arena. Protest politics differs from information politics as it stages events to attract attention and increase a conflict. Its aim is to convince policy makers that there is a public support to the case which will leave an impression on them (Beyers, 2004, p. 214-215).

Access is defined as direct lobbying, as the information is conveyed directly from the interest group to the policy makers. This strategy is useful when conveying operational and technical information, as the message is more clearly conveyed in direct lobbying with less chances of misunderstandings or lack of information (Beyer, 2004, p. 213). However, it might prove more difficult to get access, as the interest groups or actors have to prove valid and credible expertise to be able to convey their message to policy makers, which means that the interest group needs to be an established interest group in the political landscape (Beyer, 2004, p. 214). Access, however, does not necessarily imply influence, as political actors who are ineffective, may gain access to institutions without being able to take advantage of this. On the other hand, access can be used as an indicator on how successful interest groups are, as access is power for interest groups according to David Truman (Bouwen, 2004, p. 338).

A form of direct lobbying and access is informational lobbying. Adam W. Chalmers states "The currency of lobbying in the EU is information" (2013, p. 39). Interest groups trades information to obtain access to meetings, committees, and institutions in the EU. Furthermore, how interest groups interact with EU decision-makers is defined by the information interest groups have access to and can provide. Most likely, interest groups are already experts on special policy areas in which their interests lie. This is valuable for policymakers. By inviting interest groups to the table, both the policy makers and the interest groups benefit as the interest groups get access, and the policy makers get valuable information (Chalmers, 2013, p. 41). Gullberg (2010, p. 44) presents informational lobbying as one of the main strategies on how interest organisations can influence decision-making processes.

Another main strategy that Gullberg presents is technical expertise (2010, p. 44). Because of NHO's unique position as a main organisation from a developed economy like Norway,

which is outside of the EU but part of the EEA, NHO can be viewed as a provider of technical expertise (Gullberg, 2010, p. 44-45). Technical expertise is a relevant and salient part of bureaucracy. The EU is dependent on technical expertise from outside-actors, because even though the EU draws up the legislative proposals, rules, and regulations, the EU also needs to expertise to get the correct legislative proposals and to keep up with the bureaucracy. Both the Commission and Members of Parliament (MEP) put weight on the role of interest groups in the informational section of a legislative process (Gullberg, 2011, p. 469-470).

The choice of strategy by interest groups depends on two main factors: firstly, the varying costs and benefits that the actors have access to and which is associated with the strategies, and secondly, the interest groups' structural position, in other words the access that they have to the political sphere (Beyers, 2004, p. 215). NHO has secured access to the political sphere by joining BusinessEurope which is a part of the political landscape in Brussels. Through means from its member organisations, NHO has the resources to represent its members' interests in Brussels. Beyers claims that all information that can be conveyed through voice, also can be conveyed through access, but not the other way around. This claim would suggest that interest groups should always prioritize choosing the access strategy as it is most beneficial and compatible. However, interest groups still use voice as an influential strategy because the added value of using voice in addition to access may help them sway policy makers to its cause. Moreover, some interest groups may not have the most influential access, and therefore depend on getting additional support from the public through voice. Though, established interest groups only tend to use voice occasionally as it is likely more costly than direct lobbying through access, and voice strategy also brings the risk of harming the public image if it is not convincing enough or does not get enough public support (Beyers, 2004, p. 215).

5. Case study 1: Horizon 2020

The European Research Area was applied in the Lisbon Treaty from 2009. This meant that a common European research policy, for which Commission was responsible, was to be established, but at the same time the member states also had their own research policy (Ellingsen, 2012, p. 10). Horizon 2020 (H2020) is the EU's new framework for research and innovation. With a budget of over 77 billion euro it is the largest research and innovation programme the EU has ever had. Countries, businesses, research institutions, universities etc. could apply for funding from 2014 and until 2020. The aim is to secure European competitiveness on the global market and it seeks to further develop the European Research Area. H2020 was implemented in *Europe 2020 – Flagship Initiative Innovation Union* which was the Commission's framework for better conditions and policies in the research and innovation sector (European Commission, n.d.).

Before establishing H2020 as a programme, the Commission presented a Green Paper in 2011. The purpose of the Green Paper was to promote a public debate on "the key issues to be taken into account for future EU research and innovation funding programmes" (European Commission, 2011, p. 3). Through the Green Paper, the Commission asked for input on how the EU's budget and measures should be implemented in the new research policy, the European innovation program and its competitiveness and innovation framework programme (European Commission, 2011, p. 3-4). Furthermore, the Commission raised several questions to reach its main goals: cooperation to accomplish the goals set in Europe 2020, how to meet the major changes in society, how to strengthen

Europe's competitiveness, and how to reinforce the European Research Area (European Commission, 2011, p. 8-13). The inputs from national governments, interest groups and other actors resulted in H2020 which was presented in November 2011 (Ellingsen, 2012, p. 44). The purpose of H2020 was to promote closer interactions between the business sector, universities, and institutions of research (Ellingsen, 2012, p. 45).

Norway participates in this research programme with the same rights as EU member countries, and therefore Norwegian businesses can apply for funding for research and innovation through the EU (NHO Europanytt, 2019). For NHO it is important to have information and knowledge about H2020, the European Research Area and the relevant policies. It lays the foundation for what both NHO and its member corporations can apply for and make the corporations competitive on a European level. This again can make Norway a competitive country on innovation and research (Ellingsen, 2012, p. 2). There has been a mutual agreement among politicians and interest groups in Norway that Norwegian participation in the common European research and innovation area is beneficial and it has had a huge significance for how research is conducted in the Norwegian Business sector (Ellingsen, 2012, p. 12).

5.1 NHO channels

5.1.1 Lobbying through BusinessEurope

NHO participated in BusinessEurope's work group on research and innovation, where it obtained most of the relevant information about the development of H2020. The information NHO was interested in was how funding would be given, how to apply, what themes would be prioritized and what stakes NHO had in them (BusinessEurope, 2018). NHO stated in the interview with Ellingsen that if it did not participate in the task group, NHO would have to get information through the departments in Norway. Instead, the departments looked to NHO for information, not the other way around (Ellingsen, 2012, p. 50).

As mentioned above, BusinessEurope have its own research and innovation working group that meets around four times a year. This group is a part of the Industrial Affairs committee (BusinessEurope, 2020). Regular participants in the working group are from Norway, Denmark, Germany, Austria, Finland, and the Netherlands, but in the period where H2020 was discussed a lot, more participants attended the meetings. The central agenda for the meetings was H2020. Through this group NHO met actors that it could share political views and goals with. Also, the group contributes to forming NHO's positions. This could indicate that H2020 was a prioritized area for the research and innovation sector (Ellingsen, 2012, p. 54). However, the meetings in the research and innovation group in BusinessEurope is characterized by consensual decision makings. This means that NHO is limited to promote interests that Norway or NHO has a special interest in, for instance petroleum, as this is not likely to be supported by other countries/members (Ellingsen, 2012, p. 55). In other words, even though NHO has great value in participating in the meetings, not all of its interests can be discussed nor presented in the meetings, as the norm is that everything that is presented should be relevant to the others as well. In Ellingsen's research, the informant from NHO expressed a dissatisfaction of this arrangement, because NHO wished for a higher threshold of matters that could be discussed and thought of the debate culture as strict (Ellingsen, 2012, p. 54-55).

The Green Paper from the Commission on H2020 asked 27 questions (European Commission, 2011), and NHO answered six of them in the input document sent to BusinessEurope. Through the Green Paper, the Commission initiated public consultation with stakeholders. NHO was concerned about the relationship between EU-funding, and regional and national funding, simplifying administration and small businesses, the understanding of innovation, innovative public acquisitions, and a pilot-plan on a European PhD (Ellingsen, 2012, p. 51-53). This input was sent to BusinessEurope who answered all the Commission's 27 questions in its own input document based on its members previous answers, including those of NHO (BusinessEurope, 2012). The input that BusinessEurope sent into the Commission was characterized by consensus from its member organisations, even though the members had different priorities.

5.1.2 Lobbying on a national level

The core element of the Norwegian research policy is participating in the EU framework for research and innovation. Because Norway is a small country on a global scale, it is important for the country to participate in networks so that Norway can bring knowledge home. Over 4000 Norwegian applications have been submitted to H2020 from Norwegian companies and organisations, many of them from members in NHO (Norway and the EU, 2017). In Ellingsen's interview with an informant from NHO, the informant states that it was hard to negotiate with the Norwegian government about H2020. The reason for this could be competition between NHO and the state, or between NHO and the Norwegian Research Council. Therefore, NHO has been selective on where to use its resources lobbying on a national level (Ellingsen, 2012, p. 56). NHO has an important connection with the Norwegian research council. The research council is a part of the Norwegian delegation to the EU, and NHO used it as an important lobbying channel throughout the H2020-development (Ellingsen, 2012, p. 56) (Norway and the EU, 2017).

NHO's focus was mostly on exchanging information via written correspondence to the Norwegian Ministry of Education and Research. Through these mails, NHO was able to comment on cases and present its views to the ministry, which again the ministry would use in the consultation response to the Commission (Ellingsen, 2012, p. 56). NHO's informant expressed that NHO experienced not being invited to all the meetings that it would have liked to participate in. NHO also chose not to have representatives on all the conferences organised by the Commission as part of the public consultation with stakeholders about H2020, because NHO for instance prioritised meetings with BusinessEurope instead. NHO's informant expressed a feeling of NHO doing a lot of the groundwork for the government and ministry, without being invited to the "fun part" of the negotiations (Ellingsen, 2012, p. 56).

5.2 NHO strategies

NHO was generally positive to the Commission's Green Paper on H2020, mostly because there was an intensified focus on increasing businesses' participation in the EU's research and innovation programmes (Ellingsen, 2012, p. 51). As mentioned above, NHO sent an input document to BusinessEurope on H2020. The input document was, in addition, sent to the Norwegian Research Council and Innovation Norway. Innovation Norway is a government funded company that aims to increase innovation in the Norwegian business sector, contribute to develop the districts, and promote the Norwegian business sector

(Innovasjon Norge, 2019). The reason for sharing the input document was to inform and keep the other actors updated on NHO's views on the new framework for innovation and research in the EU (Ellingsen, 2012, p. 54). The sharing of the document could also be indirect lobbying because NHO used other stakeholders, in this case the Norwegian Research Council and Innovation Norway, to promote NHO's interests and share its views. Both the Research Council and Innovation Norway are government funded and owned, and therefore have a different voice in the government compared to NHO which is an "outside-cooperation".

Through NHO's participation in the research and innovation working group in BusinessEurope, NHO get access to EU law makers. The research and innovation groups makes it possible for NHO meeting with other political actors, such as Commission officials and Commissioners responsible for research, which share political views, and which NHO can try to influence or sway into fronting its political views (BusinessEurope, 2020). These meetings also give NHO access to the Commission because the representatives from the Commission regularly send representatives to the meetings to get input. Through the research and innovation group, NHO was able to promote its priorities on the framework for H2020 directly to the Commission, and therefore was able to use direct lobbying as a strategy (Ellingsen, 2012, p. 54). In other words, NHO was able to use the BusinessEurope working groups as an institutional channel of influence. When exchanging information in the working group, NHO can acquire access to the institutions in the EU, and uses the information as access (Chalmers, 2013, p. 40).

Nevertheless, this strategy also works the other way around, because the meetings with Commission officials and other national interest groups with similar views contribute to sway NHO's position in a more European way. The informant from NHO that Ellingsen interviewed stated that in the meeting NHO learned something about the sector or area that it did not know. This helped NHO bring new light to its political stance on the subject (Ellingsen, 2012, p. 54). These meetings can also be informational lobbying and providing of technical expertise, as NHO trades information about its sector with the representatives in the Commission. When NHO gives information to the Commission, NHO establishes a contact with the Commission's representatives which gives direct access to the Commission. The EU sees this interaction as valuable because to fulfil the institutional role, the EU needs close contact with the private sector (Bouwen, 2004, p. 339).

Another strategy that NHO uses in its membership in BusinessEurope is to ally themselves with other Nordic representatives, such as the Confederation of Danish Industry and the Confederation of Swedish Enterprise. Through alliance-building on a European level, NHO attains a greater voice, and by having backing when voicing a matter, the chances of getting support to the cause is greater. Creating alliances between the Nordic partners has also proven to be effective, as NHO states that the representatives from the Nordic countries are generally more prepared and constitutes a larger part of the discussion than other partners. It is also important for NHO to create alliances with actors that come from EU-countries. Through them, NHO can indirectly lobby the EU. The NHO informant states that this alliance is well-suited for NHO as they share many of the same interests, such as improving the Nordic model of labour. Moreover, because NHO is an active part, it experiences getting more approval in its cases (Ellingsen, 2012, p. 55). This kind of strategy can also be characterised as informational lobbying, as the Nordic representatives exchange information to get support from each other (Gullberg, 2011, p. 469).

Informational lobbying was also used in NHO's contact with the research sector in the Norwegian delegation to the EU. This was lobbying on a national level. Norway has an embassy in Brussels, and through the exchange of information the delegation can access different institutions. This was a major advantage for NHO, as the delegation had another access than BusinessEurope (Ellingsen, 2012, p. 56). By combining access through BusinessEurope and the Norwegian delegation, NHO managed to get different ways of access to the EU which benefited NHO's influence on the process of H2020.

6. Case study 2: The Lisbon Strategy

The Lisbon Strategy (LS) was adopted by the European Council in March 2000, and the aim was to establish Europe as the "most competitive and dynamic knowledge-based economy in the world" (Ellingsen, 2012, p. 8). In other words, the Lisbon Strategy was the EU's programme for growth and employment. It builds on 24 guidelines for integrating national policy into the European policy to increase the value created in Europe (Nærings- og Handelsdepartementet 2006, p. 5). The Commission was responsible for following up the strategy. The strategy emphasized that there should be a strong coherence between growth and employment on the one side, and the work for a better environment and social integration on the other side (Nærings- og Handelsdepartementet, 2006, p. 13). The guidelines were adopted by the Council of EU, and the member states committed to report on and follow these guidelines. It should be noted that the guidelines are not political interventions but are more of the general nature (Nærings- og Handelsdepartementet, 2006, p. 21).

There were several motives for why the Lisbon Strategy was developed and launched. The EU found it hard to compete against the United States and Japan, which had experienced a high employment growth throughout the 1990s, while Europe's unemployment level remained high, especially among certain categories of job-seekers such as those under 25 and those over 55 years of age. Europe also lacked the infrastructure of a freer regulated employment market, and the lack of competitiveness between businesses on the European market (Nærings- og Handelsdepartementet, 2006, p. 15-16). The Lisbon Strategy was therefore a response to these challenges and there were several reasons to why the EU believed that the Lisbon Challenge would be successful. Firstly, growth in one country can be mutually stimulating to the other countries surrounding it. Secondly, countries could learn from each other by sharing experiences, and by comparing results and processes it would become more clear what works, and what does not work. Thirdly, supranational institutions supervising may increase countries willingness to reform on the national level. And lastly, strategic cross-border adaption may be reduced by coordinated efforts from the European countries (Nærings- og Handelsdepartementet, 2006, p. 20).

The largest challenge the Lisbon Strategy faced was that the policies that the Strategy affected conventionally fell under national sovereignty. As there was no current framework that suited the new policies, a new steering mechanism was adopted: the open method of coordination (OMC)¹. Countries were to participate in forums where they could cooperate through comparing themselves to other countries through statistical analysis and bench-

¹ The open method of coordination (OMC) is a EU soft law. It is a process of policymaking, but EU legislations adopted through the OMC is not binding nor does it require member states' laws to change. It aims to reach greater merging towards main EU goals (<https://www.eurofound.europa.eu/observatories/eurwork/industrial-relations-dictionary/open-method-of-coordination>).

mark testing. In this way, the aim was to learn through the best practice. One of the most successful policy sectors in this new mechanism was in the educational sector. They kept the national sovereignty because of the countries expertise but developed a network of indicators to evaluate the effect of the policies. This again, could influence the national debate on educational policies (Nærings- og Handelsdepartementet, 2005, p. 21). In addition to the OMC, the EU also chose the principle of sectoral coordination. The method intended that each country should contribute to coordinating measures that traditionally belonged to different political administrative sectors, for instance innovation and education (Braadland & Havnes, 2003, p. V).

By the time the Lisbon Strategy was debated, the Norwegian business sector had several elements of risk that NHO wanted to tackle. According to Harald Erichsen, board leader of NHO Hordaland in November 2002, the current situation in the Norwegian business sector was critical. The reasons for this were initially that the interest rates were four percentage points higher than other countries. Also, the wage increase had since 1998 been one to two percent higher per year than other OECD-countries. The exchange rate in Norway was significantly higher than trading partners. And lastly, the unemployment rate was increasing. All this meant that Norway's ability to compete with other countries was fading, and there was a need for reform in the Norwegian framework for employment. Therefore, NHO showed great support for the Lisbon Strategy when it was launched (Erichsen, 2002). The risk that Norway faced was that businesses chose to expand outside of Norway, because it was more attractive. Therefore, NHO wished to focus on better terms of competitiveness, and on the employment market (Erichsen, 2002).

NHO is a part of *the Nordic Model*, a model that refers to the organisation of the labour market, and the cooperation and relationship between government and the main organisations in the labour market. The Nordic model is characterised by high taxes, a generous welfare system, small income-differences, a dynamic business sector, high economic growth and internationally competitive (Rasmussen, 2007, p. 4). One can see equivalent tendencies in both Sweden and Denmark, and that is why it is referred to as the Nordic Model, and the model contributes to maintaining economic progress and Norwegian competitiveness (NOU:2, 2012, p. 372). Throughout the 1990s and early 2000, the Nordic countries in Europe saw the highest growth in productivity and employment compared to other European countries (Nærings- og Handelsdepartementet, 2006, p. 16). The model uses coordinated wage settlements between the actors in the labour market, and the government. In this settlement, NHO is one of the main actors and represents the employers. The coordinated wage settlements results in a high wage level and small differences (NOU:2, 2012, p. 427). Because of the respected cooperation between the different actors in the labour market, NHO is a respected influence in the government legalisations, and NHO has cooperated with the government on several occasions when there has been turmoil in the business or labour sector in Norway (Rasmussen, 2007, p. 18).

6.1 NHO channels

6.1.1 Lobbying on a national level

The lobbying towards the national government was generally on a low level. The reason for this was firstly, that Norway did not have a comprehensive business policy, compared to other EU-countries. Norway divided the business policy into different sectors, that belonged to different departments, for instance the Ministry of Education and Research and

the Ministry of Trade, Industry and Fisheries. This made it hard for NHO to work towards a long-term goal in the development of the business policy, as there was no superior branch for business, industry, and research. Instead, they were divided into different sectoral branches, which meant that NHO had to lobby towards several bodies, instead of one. Secondly, Norway did not have representative politicians in the EU because Norway is not a member. Therefore, a lot of information that NHO valued was not available to Norwegian politicians. Thirdly, Norway was not a part of surveys and reports on the business sector in the EU, and Norwegian politicians did not participate in meetings where these reports were presented. And lastly, after the Lisbon Strategy was presented, many European countries changed their organisational structure in their ministries to fulfil the requirements and strategies presented in the Lisbon Strategy (Braadland & Haynes, 2003, p. 31-32). Norway maintained its traditional sectors and ministries, compared to other member countries like Denmark and the Netherlands who chose to change their framework inside the departments to align more with the Lisbon Strategy. The reason behind Norway's decision to keep the traditional sectors and ministries, in contrast to other countries, was because the yes- and no-side to cooperation with the EU in Norway is about 50-50. This tendency is also seen inside the political parties, which means that there are little initiatives to enable active policies towards the EU, as it could split the parties. The maintaining of the traditional structure made it harder to fulfil the requirements of the Lisbon Strategy (Braadland & Haynes, 2003, p. 16).

For these reasons, NHO's lobbying of the Norwegian government was constrained in many ways. At the same time, some opportunities existed. For example, NHO participated in the Foreign Ministry's seminar about the Lisbon Strategy in April 2002, along with other interest organisations and ministries. In this seminar, NHO advocated for an overall plan and measures on how Norway could approach the Lisbon Strategy. NHO called for a clearly defined political will and political priorities from the Norwegian government in business policy. NHO was positive to a sectoral intervention from a superior branch for research, education, and innovation, as the Lisbon Strategy proposed, because NHO wanted a more comprehensive Norwegian business policy. This meant that the sectors in Norway would be divided into a new structure, and there would be new changes in the ministries and departments. However, this was hard to adopt in Norway, as the country is divided in segments in both the ministries and the committees in Stortinget, the Norwegian parliament (Braadland & Havnes, 2003, p 12). NHO was also negative to Norwegian actions towards implementing parts of the Lisbon Strategy, arguing that Norway should implement as much as possible. NHO reasoned that the Norwegian government could come with more measures that would fulfil the Lisbon Strategy and most likely strengthen the Norwegian business sector. In other words, NHO stated that the lack of measures implemented after the Lisbon Strategy was launched, showed weakness in Norwegian competitiveness with other countries (Braadland & Haynes, 2003, p. 17).

6.1.2 Lobbying through BusinessEurope

When the Lisbon Strategy was launched, BusinessEurope was still called UNICE. However, for simplicity, this section will keep referring to BusinessEurope.

Interest groups use position papers to present their policy issues to other actors and try to persuade them (Klüver, 2011, p. 493). This was a lobbying tool used by NHO. For example, in March 2003, NHO presented a position paper to BusinessEurope. In the document NHO made in line with the Lisbon Strategy, NHO expressed the need for an integrated business

policy in Norway. NHO argued that actions towards this would eventually lead to fostering creativity, as well as tax and social security policy (BusinessEurope, 2003, p. 3). In September the same year, BusinessEurope presented its own position paper to the Commission (UNICE, 2003, p. 1). Position papers made by BusinessEurope tend to represent a compromise of all its members positions. By sending in its own position paper in advance of BusinessEurope's paper, NHO was able to communicate its position to BusinessEurope to ensure that it would be considered. In the position paper BusinessEurope sent to the Commission in September, it expressed that it was generally positive to the Lisbon Strategy. However, BusinessEurope expressed the need for clarification on how the organisation around social inclusion, pensions and health care would be (UNICE, 2003, p. 1).

BusinessEurope targets the Commission as a lobbying venue because of its role in drafting and monitoring legislation (Greenwood, 2017, p. 25). Compared to other states and countries, the Commission is understaffed. Information and work from outside stakeholders are therefore central for the Commission to be able to do its work. That is why interest groups prefer the Commission as an influence channel, because they can provide information and get a voice (Gullberg, 2010, p. 45). In this case, the Commission was also targeted because of its responsibility of launching the Lisbon Strategy. During the period from 2003 to 2008, BusinessEurope completed and delivered six position papers on the Lisbon Strategy that were sent to the Commission, as well as the public and other affiliates of BusinessEurope (BusinessEurope a, n.d.).

6.2 NHO strategies

The position papers submitted to BusinessEurope, and through BusinessEurope to the Commission can be defined as informational lobbying (De Bruycker, 2016, p. 603). This can be characterised as access and direct lobbying, where NHO tries to steer the Lisbon Strategy using its membership in BusinessEurope. However, the direct lobbying can still be characterised as insider lobbying and access. This is because NHO lobby – through Business Europe – the EU's institutions, and not by swaying the public and grassroots mobilization (Holte, 2011, p. 28). In the period from the launch of the Lisbon Strategy to 2008, NHO also presented several speeches, press releases, newsletters, public letters and more, in addition to position papers (BusinessEurope b, n.d.). By addressing the public through public letters, one might suggest that NHO also uses voice as a strategy to present its positions. Using this sort of lobbying also makes sense in social policy since, unlike research policy, it will affect broader segments of the public too. However, the press releases, newsletters and position papers are targeting BusinessEurope and the European institutions, and can therefore be classified as direct lobbying, because the information travels directly from NHO to the targets, and not through the public opinion. Access is a useful strategy as there are less chances of misunderstanding, and NHO has proven through its use of channels that it has the necessary access to use this strategy.

By writing the position paper on how Norwegian infrastructure needs to change to implement the Lisbon Strategy in Norway (BusinessEurope, 2003), NHO provided information, through BusinessEurope, to the Commission and to the Norwegian government on the political consequences on resolutions. By writing and presenting this position paper, NHO both provided information and technical expertise to BusinessEurope, which again served BusinessEurope when it wrote its position paper to the Commission months later. NHO used its position as an influential Norwegian interest group to provide

technical expertise on how the Lisbon Strategy may affect the Norwegian economy and political structure. In addition to the Norwegian Government, one could argue that NHO is the only actor that possesses this information about the Norwegian market, and therefore can prove that NHO possesses valuable information. The same goes for BusinessEurope, which in turn holds unique information on the European Countries market from an employer's point of view. However, because of NHO's position as an interest group outside of the EU, its influence on BusinessEurope is just as important. Therefore, one can argue that if BusinessEurope is viewed as a technical expert, it may be beneficial to NHO because of being able to influence through position papers to BusinessEurope. The technical expertise on the business, research and innovation sector is especially relevant for the Lisbon Strategy, as it was a new approach and tactic from the EU that required information on how all the different member countries in the Union and in the EEA-agreement were structured politically.

Umbrella organisations like BusinessEurope is concerned about reaching consensus between their member organisations. This means that all of BusinessEurope's policy matters that are presented to the EU, are made by a consensus from the member organisations (Gullberg, 2010, p. 32). Interest organisations may therefore find it easier to promote their interests by getting allies and forming umbrella "interest groups" that can promote their specific interests (Gullberg, 2010, p. 32-33). NHO, together with the Danish trade union of confederations and researchers in the field of work organisation, established the Employee-Driven Innovation (EDI) network in 2004 based on the Lisbon Strategy's framework programme (Pot, Totterdill, Dhondt, 2016, p. 4). EDI also became part of the Norwegian government policy in 2008, and NHO cooperated with the Norwegian labour organisation (LO) on making a handbook for EDI.

7. Conclusion

The aim of this study was to explore how NHO lobbies in the European Union's social policy and funding for research and innovation. Both case studies on Horizon 2020 and the Lisbon Strategy exemplify how an interest group like NHO can lobby the European Union. The case studies showed how NHO lobbies the European Union using BusinessEurope and the national government as channels. By attending work groups, sending in position papers, and participating in meetings, NHO was able to voice its opinion to BusinessEurope who again had access to a greater platform. Even though both case studies characterised a minimal focus on lobbying the national government, the use of the national route differed. NHO was selective on the use of resources towards the national government, and only participated in a few seminars or lobbied through the Norwegian Research Council. Prominent strategies used in the two case studies were informational lobbying and alliance building with Nordic neighbours.

An important limitation for this thesis was the lack of information on how NHO used its office in Brussels to lobby towards the EU. This may be because of interest groups' reluctance to make information about its lobbying activities publicly accessible, which also limits access to relevant sources for researchers. As mentioned in the section about the office, the Commission is known to be accessible to interest groups. Additionally, most interest groups have a Brussels office, to be close to the European institutions. Therefore, the assumption was that NHO would use its office actively in the lobbying of the Lisbon Strategy and H2020. However, evidence for this proved hard to find, even though several studies (Eliassen & Peneva 2011, Holte 2011, Larsen 2009) suggested otherwise.

Accordingly, the lack of sources about how NHO used the Brussels office as a channel for lobbying H2020 and the Lisbon Strategy limits this thesis and suggests that there is room for more research on the practise of interest group's offices in Brussels. One can conclude by stating that the Brussels office exists and is used, but the extent to how it is used is difficult to assess because there are no public documents available on how it is used. In terms of primary sources, working with interest groups can be challenging because of the limited availability of documents. One might wonder if the reason for this is that a lot of the information between stakeholders is exchanged orally, often behind closed doors, and therefore there is a limitation to how much that can be accessed online. A more comprehensive study of the lobbying channels and strategies to NHO should therefore use qualitative methods like interviews and observations. The fact that lobbying national government in the two case studies appears of second importance, may be indicative of a preference to use BusinessEurope. Further research with other case studies would be necessary here to confirm this.

In both case studies, BusinessEurope proved to be the primary channel to give input on the cases. In both cases, BusinessEurope gathered input from their member organisations, and set up an input/position paper which was sent to the Commission. However, because the policy in BusinessEurope is to strive for consensus from the position of its members, it is most likely that elements of NHO's input has been lost in the process from its input to the shared position paper that BusinessEurope sent out. One could state that NHO would not have obtained the same opportunities if it had interacted directly with the EU in any other ways, because Norway is not a member of the EU. One can also see other networking opportunities that BusinessEurope opened to NHO, when looking at the alliance-building NHO did during the negotiations of the Lisbon Strategy. By attaining access to a networking platform like BusinessEurope, NHO was able to gain allies and partners which NHO could cooperate with to get its views promoted in BusinessEurope. Just as important, by creating alliances with countries who are members of the EU or sister unions who happens to be in the EU member states, through BusinessEurope, NHO gets another foot inside EU. By coordinating positions with interest groups which have national representatives in the EU institutions, NHO can indirectly lobby the EU. Because there was more focus and resources put into the BusinessEurope-channel, one could state that NHO prefers BusinessEurope over the National level as a lobbying channel, even though NHO competes with other members on which policy issues that need to be prioritised. However, this does not mean that the National level is not used as a channel, but it was used to less extent in the case studies.

Gathering from the two case studies, NHO prefers access and direct lobbying compared to voice and indirect lobbying. In the case of the Lisbon Strategy, because NHO presented public documents like newsletters, it addressed the public. Therefore, one could argue that NHO used voice strategy as well. Using this sort of lobbying also makes sense in social policy since, unlike research policy, it affects broader segments of the public too. The most valuable indirect lobbying NHO did, was through alliance building with other Nordic partners. By lobbying them, and by assuming it uses the national level to a bigger extent than NHO does, NHO was able to indirectly lobby countries which are members of the EU. The allies provide another platform that NHO can use. However, based on the case studies, NHO seems to prefer informational and direct lobbying. One can explain this by looking at NHO's purpose in Brussels, which is to collect information that is valuable for its members and to as a spokesperson for its members.

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