CORPORATE GRASSROOTS LOBBYING IN THE EUROPEAN UNION

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1   INTRODUCTION

1.1   The changing field of corporate political activity

It has been speculated that in Western democracies political issues are being increasingly influenced by public opinion. Public opinion has gained significantly in importance to politicians as an outcome of several political social and technological developments. One reason behind the change seems to be that public has become more educated and demanding. In addition, Internet has grown rapidly which has empowered the public and non-governmental organizations and lowered the barrier for political influencing. (Titley 2002, 83.) The European Union environment has been undergoing similar changes. The digital revolution, the drastically increased number of member states of the EU and new legislative powers of the European Parliament, amongst other factors, have altered the political environment of Brussels in the past 20 years. (Althaus 2008, 477-493.)

The environment in which a company is functioning influences greatly what kind of corporate political activity a company should apply to try to influence the decision makers (Broscheid & Coen 2003; Taminiau & Wilts 2006). These changes in the political environments have had impact on the field of corporate- and interest group political activity. Due to the increased emphasis on the public opinion in politics, in the United States politically active non-profit organizations and citizen groups have started influencing decision-making by *constituency building campaigns* and by doing so forced the corporations to also find new ways to influence the political process (Walker 2007, 2009).

Similar to the US, the active non-profit organizations and citizen groups in the EU have carried on influential constituency building campaigns, especially mobilising people to contact the decision makers via grassroots lobbying tactics.(Althaus 2008, 477-493) The constituency building strategy has been speculated to be especially effective in the EU, because the EU institutions are constantly searching to legitimate their decision-making and the constituency building tactics are based on citizen and stakeholder dialogue. (Taminiau & Wilts 2006, 7.) The success of these interest groups suggests that it could be beneficial for corporations to also select constituency building strategy to be able to compete in the European Union environment. (Althaus 2008, 477-493) Some studies researching corporate political strategies in the US even argue that constituency building strategy, which includes tactics such as grassroots lobbying and advocacy advertising, could be the most effective strategy for influencing legislative decision-making in general (Michaels 2000).

Based on above, it can be concluded that the European Union environment has been going through significant changes during the recent years. The digital revolution, the changed dynamics between the institutions due to the Treaty of Lisbon and more educated and demanding public have increased the importance of public opinion in the field of corporate political activity. Managing the public opinion to influence the political decision-making has become increasingly attractive strategy for companies.

1.2   Purpose and structure of the study

Compared to the increasing interest in the role of stakeholders in the business literature and growing importance of constituency building as a corporate political activity, it is surprising that wide attention has not been given to the role of stakeholders in corporate political activity and grassroots lobbying tactics (Walker 2009, 566). Academic studies concerning the EU corporate political activity have usually taken the perspective of traditional political science and examine political structures and formal processes rather than managing the public opinion (Titley 2005, 222).

There is some previous research on the constituency building strategy in the EU. Mahoney (1999) examined which kinds of organizations use constituency building strategy in the EU and in the US and which factors influence on whether or not an organization selects to use the constituency building strategy. Nevertheless, the most popular constituency building tactic, grassroots lobbying, seems to be under-researched at the EU level. Furthermore, the grassroots lobbying research conducted in the US seems to be primarily concentrating on the mechanism of how grassroots lobbying works, rather than trying to examine and describe more comprehensively how the grassroots lobbying tactic is implemented and in which kind of situations the tactic is applied. (E.g. Ainsworth & Sened 1993, Kollman 1998, Harris & McGrath 2012) The deeper academic understanding and description of the use of the grassroots lobbying tactic seems to be missing.

Therefore there appears to be a research gap in the research the use of grassroots lobbying tactic at the European Union level. Thus the objective of this study is *to explore how the companies use the tactic of grassroots lobbying in the European Union environment.* This objective can be divided into the three following sub-objectives:

- *To map what kind of factors influence the selection of the grassroots-lobbying tactic in the European Union level*
- *To examine how a company targets a grassroots lobbying campaign in the European Union environment*

- *To describe the implementation of a grassroots lobbying campaign in the European Union environment*

The sub-objectives were formed based on the previous research of corporate political activity which focused on the factors influencing the selection of a certain tactic or strategy, and which target corporate political activity. The last question of implementing a campaign was selected, because the more practical point of view on grassroots lobbying tactic seemed to be completely missing and to get more insights and fuller description on the tactic it was considered to be important to extend the research in this area.

In this thesis the focus is on examining non-collective corporate lobbying. Corporate lobbying in the EU has traditionally been organized under sizable business associations that represent business concerns directly to the policymakers, and these associations have not frequently engaged with the wider public to do their lobbying. (Althaus 2008, 477-493) Joos (2011, 122) proposes that the form of non-collective lobbying has been increasing during the past years in the European Union and the United States. Individual companies are increasing the use of their own liaison offices, representative offices and agencies representing their interests instead of only lobbying through their industry associations. It should be noticed, that in this thesis the specific and more complex features of collective lobbying will not be taken in to account in the study. Figure 3 next page depicts these two main structural categories of lobbying that are collective lobbying and non-collective lobbying and what kind of organizations are included in these categories.
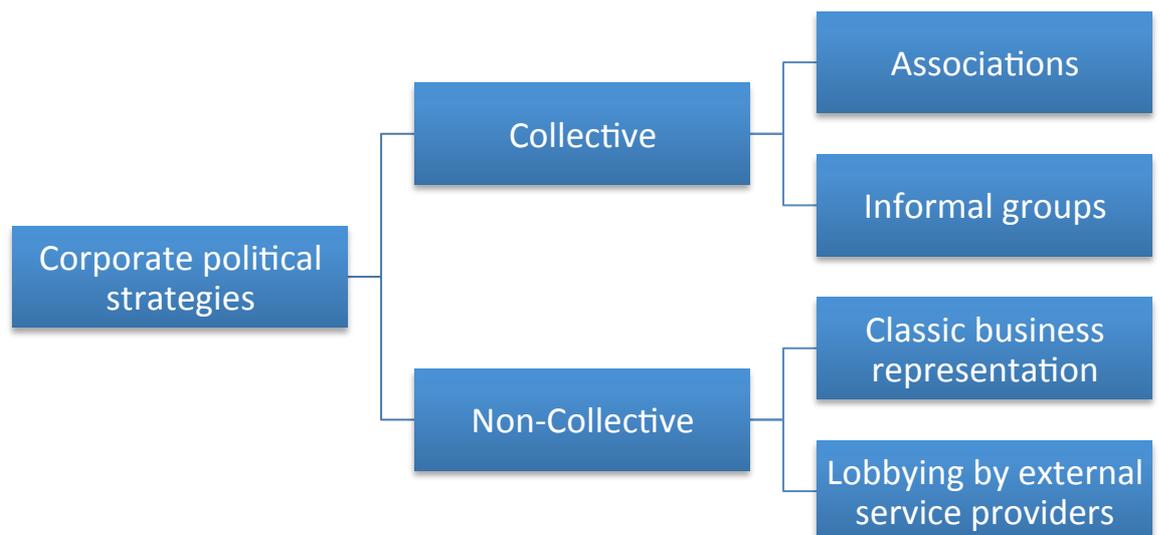
Figure 1 Collective and Non-Collective lobbying

The structure of this study is as follows: chapter two and chapter three following the introduction provide a literature review. Chapter two includes discussion on corporate political activity in general, beginning with introducing the taxonomy of corporate political activity and it continues to describe the selection of timing for the use of corporate political activity. The last part of chapter two examines constituency building as a corporate political strategy. Chapter three deals more specifically with grassroots lobbying as a corporate political tactic and explores the factors leading to the selection of the tactic. The third chapter further presents and discusses previous research on grassroots tactics that were also done specifically in the EU environment. Chapter four describes the research design. To elaborate, the chapter describes qualitative research as the research strategy, data collection via expert interviews and coding the data into different themes. Additionally, the trustworthiness of the research is evaluated in the chapter. In chapter five the empirical data is analyzed and the research objectives are answered based on the collected data. The conclusions of the study are presented in chapter six and chapter seven provides a summary of this thesis.

2 CORPORATE POLITICAL ACTIVITY

2.1 Corporate political strategies

The competitive environment of companies is influenced by the government policies. This is why many companies try to influence public policy decisions in different ways (Hillman & Hitt 1999,825). These actions can be called corporate political strategies and they are part of a company's nonmarket strategies meaning they are applied in a company's nonmarket environment. Nonmarket environment includes all the interactions between a corporation and the public, stakeholders, government, media and public institutions. Nonmarket strategy tries to exert effect on a company's market environment and is important especially if the opportunities of a company are controlled by government or challenged by the public pressure. (Baron 1995, 37.)

Hillmann & Hitt (1999) divide political strategies that corporations and interest groups use when competing in the public policy process into three different kinds of strategies: *information strategy*, *financial incentive strategy and constituency building strategy* (Table 1.). All of these three strategies include a variety of tactics. When a company chooses *information strategy*, it exchanges information with the policy-makers as a way to try to influence legislation. The political decision makers often deal with multiple issues at the same time and thus cannot always have all the information needed to form an opinion or a vote. That is why it is valuable for the politicians to receive information related to the issues that help their decision making process. By delivering information a company can express the preferences and opinions it has according to an issue that might influence on the functioning of the company.

Financial incentive strategy includes tactics such as company contributing financial support to politicians, party or a campaign. A company can also participate to funding of different kinds of events or contribute to arranging speakers to a political event. Political decision makers may also respond to these financial incentives. However, financial incentives often face criticism from the public that might consider these contributions as an unethical way to try to influence on political decision making. (Hillmann & Hitt 1999, 835.) The third strategy option, the *constituency building*, refers to a company educating and motivating of corporate stakeholders to actively involve themselves in public policy process on issues that could be of shared interest to the corporation and its various stakeholders (Lord 2000, 290). Constituency building is important especially to elected politicians who are interested of the views of the public that has elected them. Nevertheless, similarly the nonelected political decision-makers can be influenced via constituency building because the public opinion can also have an effect on their position and the funding of the organization they work for. (Hillmann & Hitt 1999, 835.)

Strategy	Tactics examples	Characteristics
Information Inside lobbying	Lobbying Research Position papers	Targeting political decision makers by providing information
Financial incentive	Contributions to politicians or party Paid travel etc. Honoraria for speaking	Targeting political decision makers by providing financial incentives
Constituency building Outside lobbying	Grassroots mobilization Advocacy advertising Political education programs	Targeting political decision makers indirectly through the support of constituent

Table 1 Taxonomy of political strategies

Besides the taxonomy of political strategies by Hillmann & Hitt (1999), there are other ways to categorize corporate political strategies. Chalmers (39-41, 2013) divides corporate political strategies to *outside strategies* and *inside strategies*. Inside strategies include tactics that are based on direct forms of contact between interest groups and decision makers. They involve for example face-to-face meetings, phone calls and meetings in person and are based on information exchange. The outside strategies, on the other hand, include tactics in which the interest groups mobilize citizens outside the policy-making community to contact or pressure officials that are inside the policy-making community. These outside tactics can be carried out through the media, arranging public events or introducing public campaigns. Kollman (1998) also divides lobbying tactics to inside and outside tactics. Kollman (1998) researched the use of outside and inside lobbying tactics of different kinds of interest groups in the United States.

Tresch and Fischer (2014) also divided lobbying strategies to outside and inside strategies distinguishing the outside strategies to be allocated to four different outside corporate political activities are: media, information, mobilisation and protest strategies.

When compared to the taxonomy of political strategies by Hillman and Hitt (1999, 835) many similarities were found between inside and outside lobbying strategies and information and constituency building strategies. The tactics that are part of the information strategy seem to be similar than the tactics categorized by Kollman (1998) and Chalmers (2013) and Tresch and Fischer (2014) as inside tactics and outside tactics are similar to the tactics of constituency building. The tactics that are part of the financial incentive strategy are not taken into account in the division to inside and outside lobbying strategies. Therefore the taxonomy of political strategies by Hillman and Hitt (1999) can be considered as more comprehensive theory and is used in this research for categorizing corporate political strategies. In Table 1. taxonomy of political strategies by Hillman and Hitt (1999) is brought together with the division of lobbying tactics by Kollman (1998), Chalmers (2013) and Tresch and Fischer (2014) to inside and outside lobbying strategies.

Corporate political strategies can be applied in different arrangements. The approach of a company can be relational (long term) or transactional (ad hoc). Hillman and Hitt (1999) define that "relational" approaches to corporate political strategies as long-term and issue spanning relationships and "transactional" approaches as more ad- hoc and issue specific relationships. A firm can also decide to use either one of the strategies or a combination of them in an attempt to shape its competitive environment through public policy influence. (Hillman & Hitt 1999, 833)

The environment, in which a company is functioning, influences greatly on what kind of corporate political strategies it should select to use. It is clear that European Union lobbying differs in many ways from lobbying in the United States. Many authors have, for example, observed that in the European Union, success in lobbying is not gained by campaign contributions or political benefits, but by delivering expertise and information to the EU officials and decision-makers (Broscheid & Coen 2003; Taminiau & Wilts 2006). In the next chapter I will be going through different strategies for corporate political activities. In the previous studies, it has been noted that in Europe, the effectiveness of corporate lobbying is remarkably depended on the quality of companies' knowledge and information strategies. Financial incentive strategies have not been seen widely applicable in the EU context because of the regulation forbids big financial donations to EU decision-makers.

2.2   Selecting timing for corporate political activity

Selecting which corporate political strategy to use is an important decision for a company, but it is equally important to decide when this political activity should be implemented. The Life Cycle Model of public policy management (Buchholz et al, 1994) depicts the development of public policies and the time it takes them to move through different institutions. The Life Cycle Model also helps to make suggestions of which corporate political strategies a company should use in each phase of the policy process.

Buchholz, Ryan & Swanson (1987) argue that there are three phases in issues life cycle, which are 1) public opinion formation 2) public policy formation and 3) public policy implementation (Figure 4). In public opinion formation phase, the issue becomes salient in public environments such as in the media. During the public policy formation phase the issue is salient in legislative and executive institutions and during the public policy implementation phase the policy is implemented by regulatory and judicial institutions. (Vanden Bergh and Holburn 2007, 2-3.)
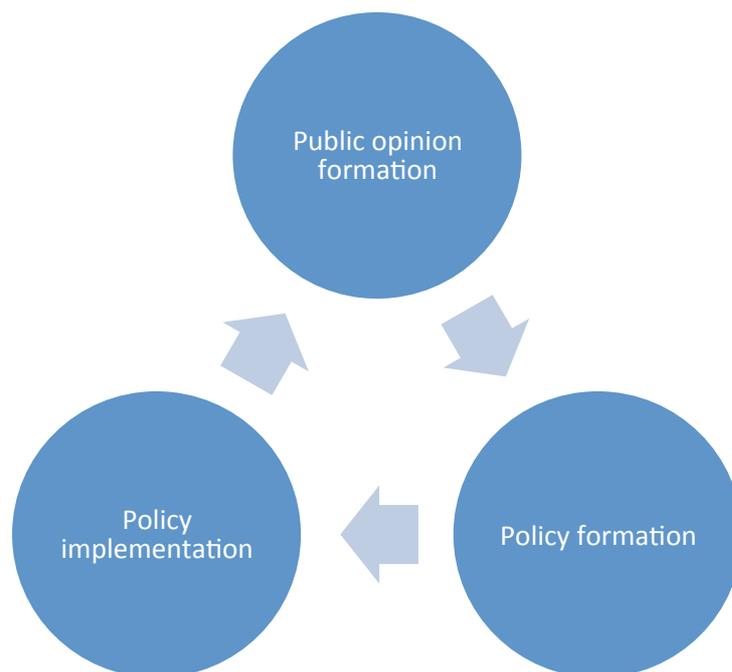
Figure 2 The Life Cycle Model of public policy management (based on Buchholz, Ryan & Swanson 1987)

There are different versions of the life cycle model. Marx (1999), for example, adds a fourth phase to the issues life cycle. The fourth phase is called a social control phase

and it follows after the implementation of a public policy. This fourth phase can be seen linked to the argument that issue life cycle does not necessarily end in the last phase. It has a possibility to be renewed, which makes it cyclical. In the end, if the participants are not content with the result of the political decision-making, the public discussion can be triggered to get active again and make the issue life cycle to start from the beginning. Also, the need to change the content of the decision can be caused by changes in the environmental conditions. (Jaatinen 1999, 135-136.) Because of this, it has to be taken into account that lobbying is a continuing process and takes time. Lock & Harris (1996, 318) also consider lobbying to require time to be successful. They argue that campaigning on just a single issue has a risk of being interpreted as a crisis response and also therefore lobbying should be continuous. However, in this research the issues life cycle with only three phases was selected to be used, due to the fact it was more common in the literature and also offered that the three steps offered a more tangible way to follow the development of an issue.

The concept of issue life cycle can be utilized in a conversation concerning what is the most optimal timing to start a lobbying campaign. Many researchers think that the earliest stage of the issue life cycle, public opinion formation phase, is the most optimal timing to start lobbying. However, the arguments behind the claim vary. According to Harris and Lock (1996, 319) it is more effective to start lobbying in early stage of drafting and thinking of the issue than starting to try to influence on the issue when the suggestion for a regulation is already published. Renfro (1993, 40), on the other hand, suggests the public opinion formation phase to be crucially important, because how people approach the problem defines if they consider it to be important and forms the way they will see the potential solutions. Marx (1990) argues that lobbying is most influential in the first phase of the issue life cycle, because during this phase, the alternative solutions can still be innovated and there is still enough time for a company to adjust its business plans to be compatible with the potential new policies. When an issue has reached the policy formation and implementation stages, a company has often no chance to work pro-actively, but has to react defensively to the interpretation of legislation and the social control mechanisms. (Marx 1990, 12.) Jaatinen (1999, 85) agrees that the earlier a lobbyist starts a campaign, the better are the chances of success. Taminiau & Wilts (2006, 126.) also propose that because the first phase of the policy cycle can have far-reaching effects on the tone of discussion around an issue, it can be critical for a company to get involved in the policy cycle as quickly as possible. During the first phases of the policy cycle the different actors can try to influence the topic and prioritize specific issues and problems. To summarize, many researchers consider the first phase of the issue life cycle as the optimal timing for lobbying, because during this phase a company can influence specific parts of the drafting of the legislation and the way the problem is approached. In addition, during this phase a company can work pro-actively with the

decision-makers and participate to finding a solution to the problem. Companies also tend to have better chances to succeed influencing the regulation with lobbying, the earlier they start.

Some of the researchers also believe that different corporate political strategies are more suitable to different phases of the policy process. Hillman and Hitt (1999) suggest that companies should use different corporate political strategies during the different phases of the life cycle. They propose that when an issue is in the public opinion formation phase, a company should choose grassroots constituency building activities. Jaatinen (1999, 85) also argues that the first phase of issue life cycle is primarily focused on setting the agenda and mobilizing public opinion and stakeholder support. Financial and informational strategies should, on the other hand, be implemented during the policy formulation stage, when the legislative bills are under consideration (Hillman & Hitt 1999). Figure 4 in the next page depicts the use of different corporate political strategies during the policy process.
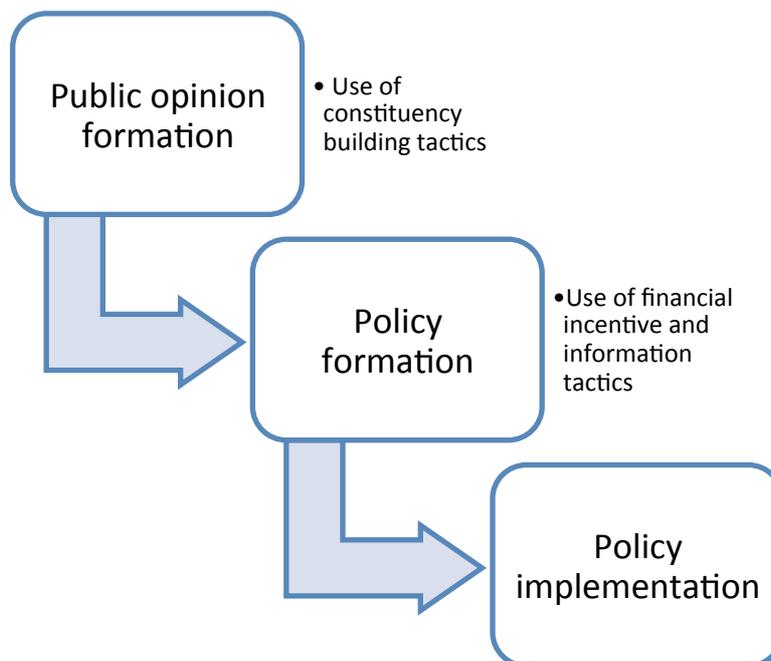
Figure 3 Corporate political strategies during the policy process

The selection of timing of lobbying might also be dependent on *the institutional environment* a company is lobbying at. Kellow and Zito (2002, 46) propose that it is most beneficial to select an arena where the resolution of the political issue has not yet been settled and thus is easier to influence. In other words, if there are several institutions where the political issue is processed and the timing of the political process differs between the institutions a company can choose the institution where the political issue is in the best possible point of the political process.

Stage of legislation can be defined as the position of a policy idea along a time line from a new proposal brought forth from many possible sources to a final bill voted upon (Kollman 1998, 105). Public opinion formation phase means the stage where issues of concern to business are emerging: public interest in the issue is emerging and developing. During this stage, corporations have the opportunity to shape public opinion. This opportunity may result in a policy preference that coincides with that of the firm or could obviate the need for public policy altogether. (Hillman & Hitt 1999,11) .

2.3   Constituency building tactics

This study researches the use of grassroots mobilisation tactic by corporations in the EU. Grassroots mobilisation is a tactic that is part of constituency building strategy and therefore it was found essential to first go through some general characteristics of constituency building strategy. Corporate constituency activities include educating and motivating corporate stakeholders to actively involve themselves in public policy process on issues that could be of shared interest to the corporation and its various stakeholders (Lord 2000, 290). Constituency building is often also called outside lobbying. (Mahoney, Christine 2008, 147, Kollman 1998, Chalmers 2013) In this research, the term constituency building will be used based on the taxonomy of political strategies by Hillman and Hitt (1999), but the term will be used as a synonym to outside lobbying.

A constituency of a corporation refers normally to the employees, shareholders, suppliers, dealers, customers and community residents of a place where the corporation has a remarkable presence. Often the aim of constituency building is to encourage constituents to contact their political representatives concerning particular issue important to a company. (Gerald, Carl, & Barry 1986, 56.) Kollman (1998, 3) defines constituency building activities as *"attempts of interest group leaders to mobilize citizens outside the policymaking community to contact or pressure public officials inside the policy making community"*. It can be thought that corporates work this way in the middle of policy-making community and the outsiders of this community and try to stimulate interaction between these two groups. Corporate constituents can represent significant competitive advantage to a company because they represent interests of large groups of voters who might be willing to participate in political field. Because the elected representatives are, in general, very eager to receive the feedback from organized constituents, the corporates can be able to communicate to them alongside their constituents. (Gerald, Carl, & Barry 1986, 62.)

In the research of Kollman (1998) the groups that lobby were divided into five different interest groups. Based on Kollman's results, from these groups the public interest groups and labour unions used the constituency building tactics most whereas the pro-

fessional trade associations and corporations used the constituency building tactics least. Also, some classes of groups, particularly labour unions and public interest groups used a broader selection of constituency building tactics more regularly than professional and business groups. Kollman (1998) suggests that corporations use constituency building tactics less than other interest groups. Also the selection of different constituency building tactics that corporation use seems to be narrower.

Constituency building tactics involve grassroots mobilization of employees, customers, or other stakeholders, advocacy advertising, public relations, press conferences and political education programs. (Walker 2009, 565.) Scholzman and Tierney found that 84% of groups that lobby in the US running letter writing or telegram campaigns (Kollman 1998, 37). There is also more recent evidence that mobilising constituencies to contact policy makers is highly popular in the US. According to Mahoney the most common form of constituency building amongst the interest groups interviewed in the US was urging constituencies to contact policy makers (Mahoney 2009). Due to the scope of this research, examining different kinds of tactics more comprehensively was considered impossible. Therefore this research concentrates on grassroots mobilisation, which based on the previous theoretical work seems to be the most used form of constituency building.

There has not been a lot of research on how wide the use of constituency building strategy is amongst the groups that lobby. All of the interest groups interviewed in Kollman's research (1998, 41) reported to use some form of inside lobbying whereas outside lobbying was used frequently but less than inside lobbying. Therefore the research of Kollman (1998,41) suggests that the groups that lobby in the US use either both constituency building strategy and information strategy or merely information strategy, but never only constituency building strategy. This could mean that the constituency building strategy is usually implemented to complement information strategy rather than being a main lobbying strategy. However, based on just one research implemented in one country, these results cannot be broadly generalized.

3 GRASSROOTS LOBBYING

3.1 Grassroots mobilization

In policy-making and lobbying, grassroots means reaching out to individuals one-on-one to seek for their support and to recruit their participation. The goal of grassroots mobilisation is to build a relationship in two levels. First, building the relationship between an organization's grassroots network and the person mobilized and next, between the person mobilized and the legislator or regulator that the organization is trying to influence. (Grefe 2000, 4.) In this study the term grassroots-lobbying tactic is used to describe the tactic of a company reaching contacting the public to seek their support and recruit their participation to a political campaign. In this chapter I will first describe grassroots lobbying based on previous research, then what factors have an influence on whether an organization chooses to use grassroots lobbying as tactic and finally examine how the previous research describes constituency building strategy in the EU environment.

Even though grassroots lobbying is relatively new field of research, there is some previous studies that examine the phenomenon from different points of view. One of the points of view has been studying why grassroots tactic works. Most of the theoretical work proposed that decision-makers *gain knowledge* about the salience of an issue through grassroots lobbying. When citizen contacts a decision-maker, it shows that constituents are ready to take a costly action to notify their legislators about their preferences on an issue. Decision-makers are this way communicated which issues are very important to the constituents and are willing to try to influence these issues. (Ainsworth 1993, Ainsworth & Sened 1993, Kollman 1998.) According to Bergan (2009, 329) the cost of the communication to the decision maker is dependable on the communication tool a constituent uses. To elaborate, the cost of sending an email is nowadays easy and therefore the cost of it might be so low that decision-makers do not consider that to indicate strongly that constituent is concerned about the issue.

Another view on how grassroots lobbying works is based on *idea of exchange*. Harris & McGrath (2012, 6) suggest that in grassroots lobbying the mobilized public exchanges their future voting behaviour in return from support for their policy position from legislators. A view similar to this is that by implementing grassroots lobbying a group can signal to decision makers they are able to mobilize supporters, and could be able to also do it during the next elections to benefit the decision makers. These signals could give decision-makers motivation to support the views of groups. (Caldeira & Wright, 1998.)

An alternative way that theoretical work has presented grassroots lobbying to work is by *increasing the capability of constituents to monitor legislative* behaviour (Arnold, 1990; Goldstein, 1999). In other words grassroots lobbying campaigns both inform group members about the actions that a decision-maker is taking that concern an issue and inform decision-makers that the members of the group are following the decision makers actions and are informed about them. (Bergan 2009, 329) According to this theory grassroots lobbying campaigns are effective because they increase communications between the decision makers and constituents and therefore are beneficial to both. Figure 4 below lists the different perceptions on how grassroots lobbying tactic works.

Grassroots lobbying tactic works, because:	Decision makers *gain knowledge* about the salience of an issue through grassroots lobbying.
	Mobilised public *exchanges* their future voting behaviour in return from support of decision maker on their issue.
	Grassroots lobbying increases *the capability* of constituents *to monitor* legislative behaviour.

Figure 4 Different views on how grassroots lobbying works

Even though these theories aim to describe how grassroots lobbying works, they have not been broadly confirmed by research. The real effectiveness of grassroots campaigns is proved only with anecdotal evidence. (Bergan 2009, 329) Even though there is no systematically proven theory on why or how is grassroots lobbying effective, there seems to be consensus on that the tactic is adequate. Some studies researching corporate political strategies in the US even argue that constituency building could be the most effective strategy for influencing legislative decision-making (Michaels 2000).

According to Dunn (2000, 17) there are two different approaches on grassroots lobbying: *ad hoc approach* and *broad-based approach*. The ad hoc approach on grassroots tactic suggests that the tactic is chosen only because a company has an immediate legislative need or threat. If only an ad hoc method is used, a company does not have an actual wider grassroots program. Contrary to this, in broad-based approach to grassroots lobbying a company has an internal broad-based program that aims to get most of the

employees or members involved in the political process. Broad-based approach does not involve only mobilisation of the members or public but also recruiting, educating and motivating members to become politically active. When a broad-based approach is taken the grassroots tactic is also used in the longer time span than in the ad hoc approach where the tactic is used only temporarily. (Dunn 2000, 17.) Grassroots campaigns can also be categorized based on their size from small mobilizations to big mobilizations. According to Kollman (1998, 98), the ways that a group aims to get the attention from the decision makers depend on the size of the mobilisation campaign. He suggests that when an organization has a small constituency, it has to signal to the policy makers that the political issue is extremely important to their members. Whereas when a group has a large constituent, it does not have to rely on signalling as strongly the importance of the issue to the policy makers to get their attention. To conclude, it should be notified that there are different kinds of approaches on the grassroots lobbying. The time spam of a campaign, the ways to engage with the public and the decision makers and the size of the public participating to a campaign can vary. These specific features of a campaign seem to also impact on things such as how the campaign is implemented and how the decision makers are signalled about a political issue.

3.2 Selecting grassroots lobbying tactic

A question of what kinds of factors drive an organization to select using the tactic of grassroots lobbying was examined in the previous literature on the topic. This chapter will go through the different influences on the selection found in the literature review. There are several different factors that can affect whether a lobbyist decides to use constituency-building tactics or not. Mahoney (2008, 149-153) proposes that there are three groups of factors that influence on the use constituency-building. These three groups are institutions, issues and interests (Figure 2.).
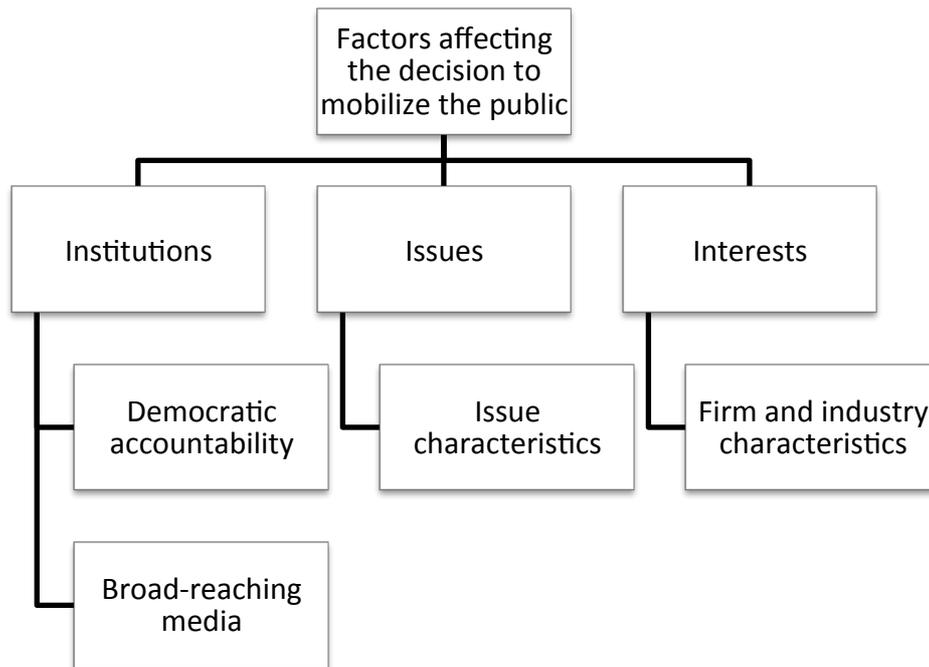
Figure 5 Factors affecting the selection of constituency building strategy

Mahoney (2008, 149-150) suggests that the characteristics of the *institutional environment* in which a company lobbies at have an impact on whether it is beneficial for a company to use constituency-building strategy. One of these characteristics is *democratic accountability* of the policy makers. The policy makers are considered democratically accountable if a method of selecting the policy makers is elections. In this case there should be more use of constituency building strategies in lobbying than if the method of selection is appointing rather than elections, appointing meaning that a policy maker is not elected by democratic elections but appointed to their position in some other way. The main idea of the constituency building is to stimulate the will of the people and inform the policy makers about it. If a policy maker is accountable to the citizens, he or she should be more eager to know what their opinions are compared to a policy maker who is not elected by the citizens. The constituency building tactics seem to be used more often in the arenas where the policy maker is motivated by the chance of re-election, in other words in a political system that is highly democratically accountable. Another institutional characteristic that influences on the use of constituency building tactics is *presence of broad-reaching media*. The presence of area-wide media such as television channel and newspaper increases the use of constituency building tactics. However, grassroots lobbying tactic aiming to mobilize constituents should still be possible even without a broad-reaching media since these kinds of campaigns do not necessarily have to be run though a traditional media such as television or newspaper. (Mahoney, Christine 2008, 149-150.)

According to Mahoney (2008, 158) *issue characteristics* also have an impact on selection of constituency building tactics. When lobbyists are active in *controversial* or *large issues* it is more probable that they will apply constituency building tactics that aim to involve the citizens in the policy-making process than in less controversial, small issues. *A large issue refers to an issue that has a lot of impact on individuals' life.* When issue is considered controversial, there are strong differing opinions about the issue. In addition to these two characteristics, the *complexity* of an issue is also suggested to have an influence on the selection of grassroots tactic. Mahoney (2008, 152) and Lord (2000, 237) propose that it is difficult to build a grassroots campaign on issues that are complicated or difficult to understand. These issues usually attract less publicity and people find it difficult to relate to them and understand how they influence their lives. (Mahoney 2008, 152, Lord 2000, 237.) Nevertheless, Mahoney (2008, 152) argues that a lobbyist can frame or define even a complex issue in a way that makes it more approachable and easier to relate to. Therefore it can be problematic to define which issues are too complex for the grassroots lobbying tactic and which are not.

Gerald et al. (1986, 57) suggests that the main reasons why a lot of corporations have avoided implementing constituency programs with constituent groups are belief that the constituents of a company are not interested of the political issues that are in company's interest or the issues are considered too diverse. Often companies seemed to be also afraid that they might receive a hostile reaction from their constituents if they tried to mobilize them to influence on a political issue. The conclusions of Gerald et al. (1986, 57) seem to support the proposal of Mahoney (2008, 158) that companies are concerned that some issues are uninteresting or too diverse to their constituents and might not therefore select the constituency building tactics. If an issue is large, controversial or some other way interesting to the public, the barrier for a company to use these tactics might be lower.

Other characteristics of an issue that can affect the selection of grassroots tactics are *issue salience* and *popularity.* Popularity of an issue refers to *what proportion of constituents support a given policy* and salience to *how important is given policy issue is to constituent.* (Kollman 1998, 24). If a public policy issue is relatively low salience to most constituents, corporate political activities other than constituency building may be more influential to shape not only the details but also the actual presentation of legislation. On the policy issues that are a great concern to many different stakeholders, constituency-focused activities are likely to have much more impact for determining legislative decision making, particularly concerning the final decision of *whether support or oppose certain legislation.* (Michael 2000, 15-16)

Salience can be defined as the *relative importance that people attribute* to policy issues. The policy-makers want to know what amount of constituents will evaluate the actions of their elected representatives on a certain policy issue, when voting in the next

election. The policy issues that are more salient will impact more on voting decisions than the less salient policy issues. The policy-makers rely to a remarkable extent on interest groups for up-to-date information on which issues are high on salience. One way to inform the policy makers about the high salience of an issue is through a grass-roots campaign and decision-makers are more likely to listen to their constituents on issues that are highly salient. (Kollman 1998, 9)

Interest groups use constituency building more often and on greater scale if they are *pursuing policies with intense support among constituents instead of policies with more diffuse support*. If there is no popular support towards the position of an interest group, constituency building tactics can be used for several reasons. Group leaders may not feel that the constituents they represent are sufficiently informed or mobilized on an issue and they use constituency building to expand the conflict and increase the salience of an issue. Secondly, group leaders understand that the policies they are pursuing, while not altogether popular, are relatively more popular than prominent alternatives, including the status quo. And third, interest group leaders are themselves mobilized by one set of policymakers to use constituency-building tactics towards another set of policymakers. Figure 6 next page summarizes the different issue characteristics that influence the selection of grassroots tactics.
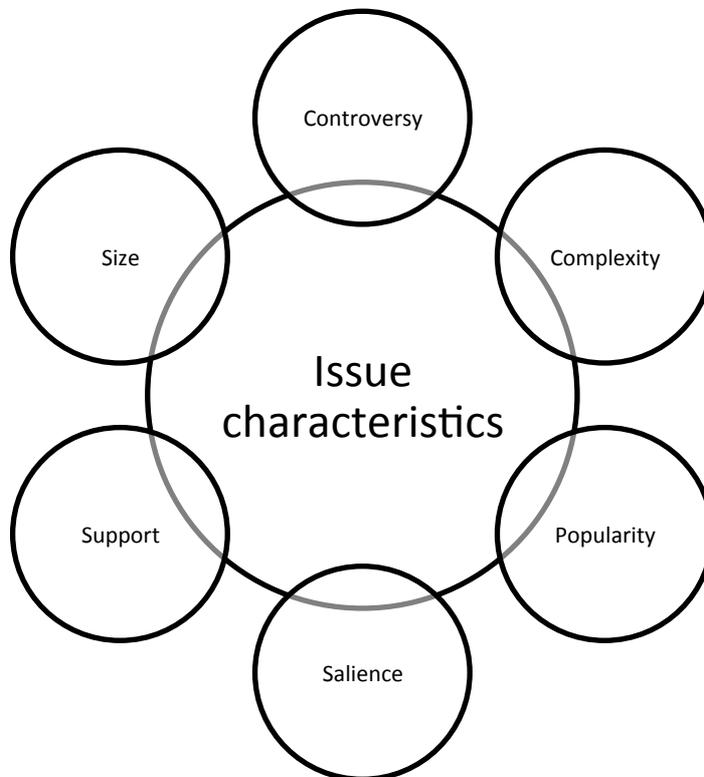

Figure 6 Issue characteristics

The third group of factors defined by Mahoney (2008, 152) is *interest characteristics*. This group contains the characteristics of an organization that is lobbying. This research only examines firms thus interest characteristics are renamed to *firm and industry characteristics*. Lord (2003, 16) proposes that some companies or industries have *a large number and broad variety of supportive corporate stakeholders* and therefore it is possible for a company to mobilize these stakeholders also as a powerful political resource. Other companies and industries have *plentiful financial resources* that they can invest in political contributions of different kinds, or hiring of lobbying specialists, but might have only few stakeholders that are easily or effectively involved into political action. (Lord 2003,16) On the contrary, Mahoney (2008, 152) argues that organizations with more financial resources should engage to constituency building tactics more, but agrees with Lord (2003, 16) on that organizations with more stakeholders or members are more likely to engage to the constituency building tactics. Kollman (1998, 34) proposes that interest groups rely on lobbying tools that they *are familiar with* and that are *suitable for their organizational culture and structure*. Following his logic, a company that would be familiar with grassroots lobbying tactic would tend to use it more than a company to which the tactic was not familiar to. The size of a company could also influence on the selection of the tactic. Keim and Baysinger suggest that greater the *employment base* of a company is, the greater potential there is for constituency building. Companies with a large number of employees have a possibility to mobilize these employees to political activities. Mahoney (2008, 152) argued similarly that organizations with a broad amount of members, or stakeholders would be more eager to use grassroots lobbying tactic, because they would have an accessible large amount of people who to mobilize. The figure number 6 in next page summarizes the firm and industry characteristics found in the literature review.
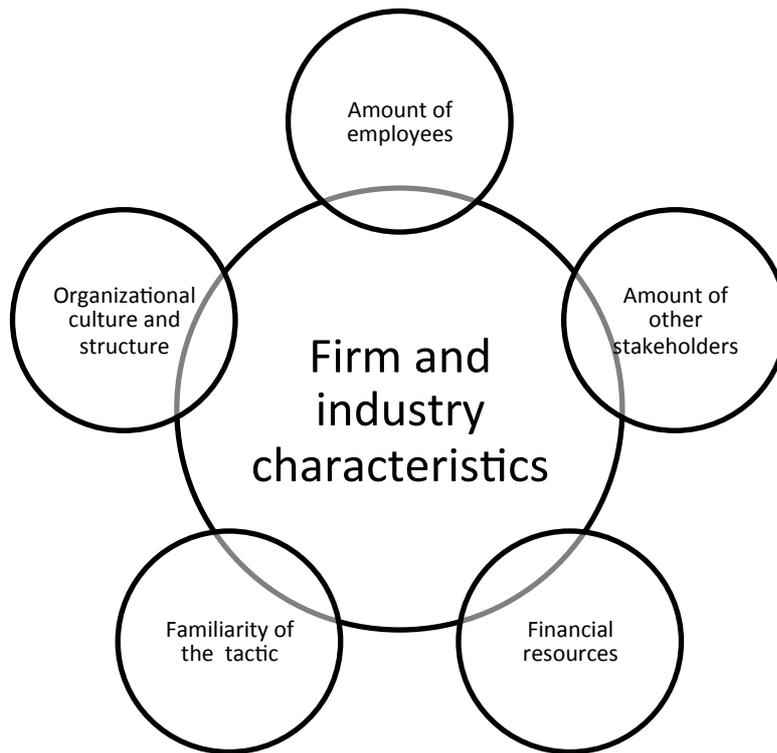
Figure 7 Firm and industry characteristics

In addition to these three factors, the point in which an issue is in its lifecycle could also effect on whether a company chooses to use grassroots tactic or not. The chapter 2.2 goes through the different phases of the Life Cycle Model of public policy management by Buchholz, Ryan & Swanson (1987) in detail. There are three phases in this model of issues life cycle. These stages are 1) public opinion formation 2) public policy formation and 3) public policy implementation. (Lord (2000, 237) and Michael (2000, 15-16) propose that the grassroots activities are effective especially when influencing the *passage or defeat* of legislation. Kollman (1998, 106.) also suggests that the grassroots activities are effective especially when influencing the passage or defeat of legislation. He proposes that most of the legislators seem to be open to grassroots feedback when deciding their votes on legislation. However, when it comes to influencing certain, detailed content of legislation, grassroots activities tend to be less influential. Kollman (1998, 155-156) also proposes that as the date of a policy decision approaches, there is often outside lobbying from all the interest groups trying to squeeze out the last bit of latent salience among their supporters and to signal their support to policymakers. In the issue life cycle the decision of the passage or defeat of legislation would happen in the public policy formation phase. Most legislators seem to be open for grassroots feedback when deciding their votes on legislation. However, when it comes to influencing certain, detailed content of legislation, grassroots activities tend to be less influential. The use of professional lobbyist and direct lobbying by top executives appear to be

more effective compared to grassroots activities when trying to influence on the content of legislation. Many constituents do not have an expert level knowledge on details of issues. Therefore a normal constituent has less credibility than an expert when it comes to advising decision-makers about the content of legislation. Thus it can be more practical to use the services of a professional lobbyist when trying to make an impact on the content of regulation. Exception to this could be if a company uses highly informed and knowledgeable constituents. (Lord 2000, 237.)

To summarize, the grassroots activities seem to be usually most effective when deciding on votes on legislation. It appears to be easier to build a credible and broad-based grassroots campaign on the issues that are less technical and uncomplicated, especially if a grassroots campaign aims to influence on the specific content of legislation. In these cases it could also be beneficial if the level of expertise of the constituents is high.

3.3   Constituency building and grassroots in the EU

The use of constituency building strategy has not been very broadly researched in the European Union level. The only previous research done on the topic that was found for this study was Christine Mahoney's *Brussels Versus the Beltway: Advocacy in the United States and the European Union* published in 2008. The research by Mahoney was used as one of the key sources in this study and it gave some preconceptions on what is the stage of the use of constituency building strategy in the EU at the moment. The environment in which a company is functioning has a significant impact on the use of different corporate political tactics of a company (Broscheid & Coen 2003; Taminiau & Wilts 2006). The EU environment has some specific features such as complex and long policy process, several significant institutions and multi-level nature of the decision making. In Appendix 1 the characteristics of the EU as a nonmarket environment are described in more detail. This chapter concentrates on describing the key findings of the research of Mahoney (2008) on constituency building specifically in the EU environment and reflects them to further literature on corporate political strategies.

Corporate lobbying in the EU has been under a lot of changes during the last 20 years. Digital revolution, the new member states doubling the amount of the EU members in 2004 and new legislative powers of the European Parliament gained in the Lisbon treaty have influenced on the political environment of Brussels in past 20 years. Traditionally, corporate lobbying in the EU has been organized under the big business associations that have lobbied the EU institutions and their work has been quite hidden from the public. However, during the past few years, the active NGOs and citizen groups in the EU have carried on influential constituency building campaigns. The success of these interest groups suggests that corporations could also be successful with

new political strategies and these new strategies might help them to compete in the European Union environment. (Althaus 2008, 477-493)

Mahoney (2008) researched the use of constituency building tactics by interest groups in the United States and in the European Union. According to the research, all the constituency building tactics were used more in the US than in the EU. The results of the study proposed that the constituency building tactics were still fairly unknown in the EU. As much as 75% of the interest groups in the EU that were interviewed in the study implemented by Mahoney (2008) did not apply any of the constituency building tactics. Out of the respondents, the citizen groups used the constituency building tactics the most and businesses least. According to Mahoney (2008, 149-165.) members of the business community are less inclined to use constituency building in the EU than the civil society groups. According to the research it seemed to also be mainly the citizen groups who used the grassroots-lobbying tactic of mobilising their members and the public in the EU.

One of the reasons these tactics have not gained much popularity in the EU is considered to be that the use media-intensive constituency building tactics in the EU level is difficult. As mentioned in chapter 3.2, the presence of a broad media system has an influence on whether the constituency building lobbying tactics are chosen and there seems to be a lack of pan-EU media or so-called European Public Space. What might prevent the development of the European Public Space is that there are 23 official languages in the EU. Multiple languages and the absence of a widespread newspaper or a television channel can make it difficult to mobilize public in the EU through broad media-campaigns. Even the EU press that exists in Brussels, it has been criticized to report public policy topics narrowly from the point of view of what issues are up for voting at the time instead of, for example, setting the agenda for new topics. (Mahoney 2008, 149-150.)

Chapter 3.2 described the issue characteristics having an effect on whether a company selects to use grassroots lobbying tactic. When the issues are high in conflict and in salience, there exists more constituency building (Mahoney 2008, 149-165). In the EU, the outside lobbying tactics seem to be more commonly used on the issues that are high in conflict and salience. In addition to the issue characteristics, the *firm and industry characteristics* were defined to have an effect to the selection. When it comes to size of the organization lobbying, in the EU, the small and mid-range offices by staff were using constituency building tactics more than large offices. On the contrary, research by Keim & Baysinger (Kollman 1998) implemented in the US argues that offices with large in staff are more likely to use the strategy. The larger offices in the EU seem to use information strategies of lobbying more, because they have resources to apply them more aggressively by for example hiring professional lobbyists or doing issue-related research. Mahoney (2008, 149-165.) argues that in the EU there is no correlation be-

tween the issue size and the use of the constituency building tactics. In the US, some of the constituency building tactics such as mobilisation of the public was used more if the scope of the issue was large, but these kinds of results were not found in the research done in the EU (Mahoney, 2008, 149-165.)

The study by Mahoney proposes that the EU advocates are not mobilizing European citizens as much as they would have potential to do. The institutional structure seems to play large role in explaining the lack of outside lobbying in the EU. One reason for the less constituency building used in the EU level can be that these types of tactics could be left to the member state level in the European Union. Mahoney (2008, 149-165.) points out that member states have an important role even when organization is trying to influence on the EU level decision-making. Having a good network in the member states seems to make it more sensible for an interest group to use grassroots tactic. If an interest group had an established on-the-ground network of local and regional offices, they mobilised their members and public more. (Mahoney 2008)

As brought up in chapter 3.2, the democratic accountability of the institutions impacts on whether the grassroots lobbying tactic is used. The results of the research by Mahoney (2008, 163-165) show that mobilization of members and the mass public tactics are also less prevalent in the EU. She suggests that the mobilisation tactics of constituency building strategy do not require a pan-EU media system to produce grassroots communications. This implies that the lack of broad media might not be the main reason the mobilisation tactics are not very popular in the EU but that the absence of democratic responsiveness of the EU policymakers could be one of the factors behind the trend. According to the research, changes in the democratic accountability of the main political institutions appear to be required to impose a re-election concern on policy makers. Increased democratic accountability of the EU policy makers could make them more receptive to communications and pressure from the public. (Mahoney 2008, 163-165.)

After the research implemented by Mahoney (2008), the Treaty of Lisbon has entered into force in the EU. This treaty that was put into effect on 1st of December 2009 changed the power structures of the EU. In the treaty the democratically chosen European Parliament was made a full co-legislator and full participant in the budgetary process. The new European citizens' initiative procedure was also introduced in the treaty. (Sieberson 2007,464.) The idea of the citizens' initiative is that if an organization or an organizer can transparently collect more than 1 million signatures regarding an issue from people, who are in voting age, and come from at least 7 different EU member states, this initiative will be taken into consideration in the Commission and the organizers can present the issue also to the Parliament in a public hearing. The Commission has to also respond formally to the organizer what kind of action they will take related to the issue and explain the reasons behind their decision. The citizens' initiative gives

the public more power when it comes to agenda setting and initiating in the EU level. (The European citizens' initiative, 2015.)

The Lisbon Treaty has been analysed to increase the openness and opportunities for public input in the EU. Even though the Lisbon Treaty improved the democracy in the EU, it can be argued that there is still a democracy deficit in the EU. To mention a few examples of this deficit, the European Parliament still cannot initiate legislation and there should be still more openness when it comes to the meetings of the European institutions. However, it can be proposed that the Lisbon Treaty gave more opportunities for the public to be able to engage to the European politics. (Sieberson 2007,464.) These kinds of changes in the political process of the EU could mean that since the Lisbon Treaty, the opportunities for the use constituency building strategy, and grassroots mobilisation tactic in the EU has increased.

Several authors have foreseen the EU lobbying becoming more public in the near future because of the Lisbon Treaty and the increased use of social media and Internet in the EU. For example, Joos (2011) mentions that because of the increase in powers of European Parliament following the Treaty of Lisbon, certain groups of voters may be having a greater role in lobbying strategies in the future. He compares lobbying in the US to lobbying in the EU, and predicts that lobbying in the EU could become "more public" also through rising use of the social media and argues that all of these changes might lead to increased use of grassroots lobbying tactic in Europe. In this study I will interview public affairs and corporate political strategy experts how they see grassroots lobbying tactic from the corporate point of view in the EU at the moment and what kinds of opportunities there will be for the use of the tactic it in the future. The next chapter will further elaborate how the research was conducted.

4 RESEARCH DESIGN

4.1 Research strategy

The aim of qualitative research is to describe and study objectives broadly. Qualitative research tries to achieve a deeper understanding of the objectives researched. (Hirsjärvi, Remes & Sajavaara 1997, 152, Eriksson & Kovalainen 2008, 5, Silverman 2000, 8.) Therefore, I found it appropriate to use the qualitative research methods in this study. The aim of the study is to *describe and understand the topic of corporate grassroots lobbying in the EU environment* and to interpret the topic based on previous theory. Testing different hypothesis is not the main goal of the qualitative research but to examine the data in detail from multiple approaches (Hirsjärvi, Remes & Sajavaara 1997, 155). This research as well aims to broaden the already existing knowledge on the topic and study the found data from different perspectives.

This study can be considered to be both descriptive and exploratory research. According to Marshall & Rossman (2006, 34) and Sontakki (2010, 68) the exploratory research is suitable when the phenomenon has not been studied widely. The phenomenon of grassroots lobbying in the EU environment has not yet been widely researched, especially from the corporate point of view. Exploratory research is applied so that researcher would get more knowledge about the objective, find new connections and meanings related to the objective and to help to form hypothesis for future research. Furthermore, the key purpose of explorative research is to view facts based on empirical evidence in order to be able to form propositions for future research and hypothesis. (Ghauri and Grønhaug 2002, 13-14.). The field of this research is still new and therefore concentrates on theoretical definitions rather than actual measuring of results. As the qualitative methods are normally applied when the aim of a study is to understand an issue that is explorative and new (Ghauri & Grønhaug 2002, 87), the qualitative methods seemed to support this research in the best way.

As mentioned previously, qualitative approach to a study often focuses on interpretation and understanding an issue rather than reaching an explanation to a phenomenon or testing hypothesis. (Eriksson & Kovalainen 2008, 5) and these are the goals of this research as well. The conclusions of this study are drawn from the empirical indication and therefore the theoretical background for the study is inductive. The main goal of the study is to view the information drawn from the empirical evidence with the aim to be able to form propositions and detailed hypothesis for the future research. (Ghauri and Grønhaug 2002, 13-14.)

4.2   Data collection

The data used in the empirical part of the research was all primary data that I collected during the fall of 2014. Primary data means the data that is collected directly by the researcher and is original (Eriksson & Kovalainen 2009, 77). Ghauri & Gronhaug (2002, 76, 81.) argue that primary data is necessary in situations where secondary data is not obtainable or the existing data is unable to answer the research questions. Because of the relatively new field of study, there was no existing secondary data on the grass-roots lobbying in the EU environment that could have answered to the research questions broadly and therefore collecting primary data was seen appropriate.

The data for the research was collected through six expert interviews. The interviews were carried during the three months time, from September to November 2014. The interviewing was chosen to be the form of data collection, because the fact the interviewing gives the researcher a freedom to adjust to the different kinds of situations and is therefore flexible as a method was seen suitable for the research. I found the flexibility of interviewing appropriate method for my study also because of the complexity and the explorative nature of the topic, which I thought could lead to multifaceted answers. Because of the complexity of the topic, there might occur a need for asking clarification and supplementary questions from the interviewees, thus I considered face-to-face interviews to be the most sensible method to conduct the study. (Hirsjärvi et al. 1997, 195)

According to Ghauri and Grønhaug (2002, 89–90), studies of selected examples are suitable when a research is concentrating on an unknown field, which was the case in this study. I did the selection of the interviewees based on a belief of possible participants' expertise in the areas of lobbying, public affairs and grassroots mobilisation in the EU level. The expertise on the field was ensured by searching for participants who had a several years of work experience in the field of corporate political activity in the EU or had done research in the field. The first-hand experience from planning and implementing a grassroots lobbying campaign in the EU was not required, but it was considered to be important that the participants had personal interest to the topic and had been actively following grassroots lobbying campaigns. A recommendation from another interviewee was also seen an adequate reason to believe that a participant is an expert on the issue. This selection method is called a discretionary selection. Discretionary selection is typical in qualitative research and it means that the interviewees are chosen based on a belief that they have wide knowledge about the researched issue and they will be able to answer the research questions (Tuomi & Sarajärvi 2002, 88-89).

In the selection of the interviewees I also used both top-of-mind thinking and snow-ball selection. Hakala, Svensson & Vincze (2012, 442) define top-of-mind brand as the

first brand that comes to mind when thinking of a product category. When applying the top of the mind thinking to organizations specialized on lobbying in the EU, European Public Affairs Council was the first organization that came to my mind. Public Affairs Council has a strong brand in expertise of public affairs in Europe and the United States. In addition, the organization had published one of the books written about grassroots lobbying that I reviewed in the first part of my research, which concentrates on the previous research on the topic. I started my search of suitable interviewees by contacting European Public Affairs Council and asking their advice on experts in the field.

Further to the top of the mind thinking, I used online search engines to find out which companies have implemented grassroots lobbying campaigns during the past years in the EU. One of the results that came up in many online news articles was the e-commerce company eBay. eBay was the first company that successfully used the European Citizens initiative, the EU petition scheme, in 2009. I chose to contact eBay, because the company's use of citizens' initiative seemed to be one of the most known examples of a company launching a EU wide grassroots campaign. Another one of my initial ideas was to interview a government affairs expert from a multinational tobacco company that had run a well-known grassroots campaigns in the EU. However, the company had a policy of not participating any researches of this kind. In the end, I was luckily able to settle an interview with a founder of one of the electronic cigarettes retail companies, E cigarette Direct that had also been actively engaging their consumers to the grassroots campaign also trying to influence on tobacco regulation.

By contacting Public Affairs Council, eBay and the E Cigarette Direct, I was able to set interviews with Andreas Baneth, Samuli Laurinkari and James Dunworth. After these three interviews, I used the snowball method to get more data by asking the interviewees if they would be able to recommend me other experts on the field. Even though I received contact details of quite a few potential experts in the area, it proved to be difficult to get responses from these professionals and only a few of these responses were positive and lead to an interview. The main reasons for refusals were the difficulty to find time for an interview and the sensitivity of a topic of corporate political activity which had led to some companies having a policy of not participating on any researches related to it. Furthermore, since Brussels is the center of the EU politics, the experts on the field might be getting numerous requests to participate on different EU related research projects. Therefore it can be challenging to get the attention of these potential experts. I contacted approximately 25 people about the study and was able to settle an interview with only six people.

All of the interviews were done in Brussels during the autumn of 2014. Three of the interviews were face-to-face interviews, two of them were implemented via Skype due to the different location of the interviewees and one was done via email, due to the interviewees' busy schedule that made it impossible for him to find time for a face-to-face

meeting. In the email interview I first sent the questions to the interviewee and after his response asked some follow up questions and specifications, just like in a semi-structured face-to-face interview. The length of the face-to-face and Skype interviews varied from 45 minutes to 2 hours. In general, it seemed to be difficult for the interviewees to commit for a long lasting interview during the fall time, perhaps because of the eventful times in the EU politics that included the first half a year for the newly elected European parliament members and the election process of the European commission happening at the same time. As mentioned earlier, some of the companies that had done grassroots campaigns to influence to the EU legislation also refused to participate to my study. The reasons behind these refusals probably were the sensitivity of the industries the companies represented, the fact that lobbying in general can be quite a sensitive topic to a company and possibly the high amount of requests these multinational companies might get to participate on different kinds of research projects.

Due to the scope of this research and the limitations in time, the amount of interviewees in this study was narrowed to six. As brought up earlier, more interview requests were sent with a thought that more data would increase the reliability of the study. However, the amount of data collected can be seen suitable, because in a qualitative research, the quantity of the cases is not the most relevant measure of quality of the study but whether the data is analysed thoroughly or not. The scientific nature of the data is not defined by the amount of it but by the quality and how comprehensive is the conceptualisation. (Eskola & Suoranta 1998, 18) However, the limited amount of interviewees can still have an effect on the reliability and trustworthiness of the research. I will evaluate the research to the further extend in the chapter 4.4.

It would have been ideal to interview all the experts at their offices where the surroundings would have been optimal in terms of background noise and concentration. Nevertheless, it was not possible for all of the interviewees to meet up during the office hours and therefore two of the interviews were implemented in the restaurants. The surroundings of the restaurants were quite noisy, which made these interviews more challenging to transcribe. On the contrary, it seemed that it might have been easier for these two interviewees to be at ease in a casual environment than it was to the rest that were interviewed at the office surroundings. The interviews done in the restaurant surroundings also lasted a longer time, as it appeared that the interviewees were willing to spend more time on the interviews that were held after the office hours.

The interviewees were from different nationalities two of them being Finnish, three British and one Hungarian. The interviewing language was English except with the two Finnish experts in which cases the interviews were implemented in Finnish since it was the first language of both the interviewer and the expert. The use of English as an interviewing language did not appear problematic, since the previous research and literature on the topic examined before the interviews was also mostly in English and therefore I

was able to familiarize myself to the key terms and concepts of the research in advance. Nevertheless, there could be some misinterpretations or understandings in the analysis of the interviews carried out in English, because it is not my first language. In addition, I found the interviews that had been done in Finnish easier to transcribe than the interviews implemented in English, especially in the cases where there was some background noise in the tapes. However, it has to be taken into account that since more time and concentration was used on completing the transcriptions of the interviews implemented in English, there can be less possibility for errors in them.

The interviews were implemented in semi-structured manner, because of the explorative nature of the study in which the goal of the research is to seek for the maximum amount of information (Eskola & Suoranta 1998, 85, Sontakki 2010, 159). Furthermore the topic of the study is new and barely researched and therefore I considered it to be useful that the expert interviews made in semi-structured approach would offer a chance to make clarifying and additional questions to the interviewees. (Hirsjärvi et al. 1997, 194, Marshall & Rossman 2006, 105) The questions were presented in themes, which allowed the interviewees to talk more about the issues related to the research objective, that they thought were important. In an unstructured interview the interviewee has more freedom to talk about the topic, which is helpful when the study objectives are descriptive as in this research (Ghauri and Grønhaug 2002, 101). The themes were chosen based on the main objective and the sub-objectives of the research. Some specifying and expanding additional questions were also asked from the participants during the interviews.

The knowledge level of the interviewees varied a lot. Most of the interviewees had been, in some point of their career, working in public affairs sector and had some background of thinking public affairs concepts in quite theoretical level. However, I also interviewed a founder of a small company who had no other experience on government affairs or public affairs than the on going campaign around the issue they were dealing with. In this case, the questions had to be re-formulated to take a bit more practical approach to the issue and the interview was more about describing how the company did their grassroots lobbying efforts in practise. The following table summarizes the different data sources used in this research.

Samuel Laurinkari	03.09.2014, Brussels	Government Affairs Manager, eBay
Andras Baneth	10.09.2014 Brussels	Director of Public Affairs Council in EU
James Dunworth	12.09.2014 video chat, England	Founder, Ecigarettes direct
Jon Worth	22.09.2014 video chat, England	Online grassroots campaign expert
Paul Fox	15.10.2014, Brussels	Policy advisor in Public Affairs, Insurance Europe
Matti Salakari	Via email, Brussels	Policy advisor in Public Affairs, Insurance Europe

Table 2 Information about the expert interviews

The first expert interview was carried through with Samuel Laurinkari. Laurinkari works as Senior Manager in the EU Government Relations department of eBay Inc. Laurinkari has worked in the EU government relations since 2009 as consultant, adviser and in managerial position in the government relations for several different companies. Laurinkari started his work in eBay in 2013.

The second expert interview was with Andras Baneth, who is a director of European office at Public Affairs council and in addition is a founder and director of Arboreus Training Services Ltd., a company consentrading on training in the EU public affairs and lobbying. Baneth has been working with the EU policy issues since 2002 and has, besides public affairs training companies, also worked in two EU institutions: European court of Justice and European Commission. Public Affairs council is the world's largest professional association of public affairs executives with 640 member organisations and 7000 individual members.

The third expert interview was conducted with James Dunworth, Director and Co-Founder of E Cigarette Direct. E Cigarette Direct is an online retail company of electronic cigarettes founded 2008. Dunworth has been very active in social media, blogging and PR advocating electronic cigarettes regulation, research and use. Unlike the other experts interviewed in this thesis, Dunworth has more a practical viewpoint to the research questions. He has not worked in the lobbying field as an expert or a consultant but has valuable experience of a grassroots campaign run by small and middle sized

electronic cigarettes companies and therefore he was considered to be valuable source of data on implementing a grassroots campaign.

The fourth interviewee, Jon Worth, is an expert on grassroots lobbying and online campaigning in the EU. Worth is an online campaigning expert who, inter alia, is a partner in techPolitics LLP, a small UK-registered agency dedicated to social media strategy and training for politics and government, has been writing highly popular blog on EU politics since 2005 and organizes and runs trainings on EU politics and institutions. In addition, Worth has been responsible of several non-profit grassroots campaigns.

The fifth interviewee Paul Fox is a public affairs policy advisor in Insurance Europe. He has worked in the EU field since 2011 and has experience in consulting in the field of public affairs in the EU. Fox has masters' degree in European public policy from University of London from 2011 and in his masters thesis he also researched lobbying from the EU perspective. Even though Fox is still a young professional, he has both academic and work experience on the field and therefore he was considered to have expertise on the topic.

The last interviewee, Matti Salakari, was recommended from Samuel Laurinkari for the interview. Salakari is also a policy advisor in public affairs in Insurance Europe. Salakari has a master's degree from 2009 in European public affairs and he has been working in Brussels in the field ever sense. Besides his academic experience in European public affairs, Salakari has over five years of experience in working in the EU environment, both as a public affairs consultant and as a policy advisor.

4.3   Data analysis

Analysing of the data was commenced the same time the data was collected, not separately. However, the in depth analysis and making connections between the data from the different sources was only completed after all the data was collected. Analysing the data while the data collection is still going on is typical for a qualitative study. (Hirsjärvi et al. 2004, 209-211.) In this study, the analysis started with transcribing the data that was in a digital form. The data was transcribed first primarily from word to word, however leaving out the parts that were evidently not relevant to the topic. According to Eriksson and Kovalainen (2009, 85), in a business related research this level of transcription is normally suitable for the research purposes.

The next step of the analysis was to examine and re-organize the data. Conducting the analysis started with coding. Coding means that the data is organized based on concepts and themes. Coding can also be called thematizing or categorizing. (Ghauri 2004, 118-119.) Boeije (2010, 75-80) calls organizing the data into themes segmenting. Ac-

cording to Boeije (2010, 75-80) the two goals of analysing qualitative data are segmenting the data and making connections. Theoretical framework and the sub-objectives of the research objectives played key roles when forming the themes for the coding. The data was read through multiple times and then divided into smaller themed segments to make the analysis easier and more structured. During the analysis of the data there are choices made of which parts of the data are examined more carefully. Typically these decisions are made based on the theoretical arguments or themes discussed in the previous literature. (Koskinen et al. 2005, 230.)

The data was first segmented by structuring the material under different categories or groups. The interpretation of the data was created based on the concepts found from the literature review and by analysis that aimed to finding similarities and irregularities from the data collected from the different sources. In this study the decision to concentrate on certain themes during the analysis of the data was also based on the previous theory and literature on the topic. Nevertheless, some of the themes also were selected from the data such as risks of the grassroots lobbying, because this issue occurred in the collected data frequently and therefore there was a reason to believe it was an important theme when researching this topic. The table next page elaborates how the analysis was formed and the themes chosen for the coding.

Research objective	Sub-objectives	Concepts	Codes
How the companies use the tactic of grassroots lobbying in European Union environment	To map what kind of factors influence the selection of the grassroots-lobbying tactic in the European Union level	Firm and industry characteristics Issue characteristics Institutional environment Issue life cycle	Company resources Familiarity of tactic Company culture Issue saliency, popularity, size, contraversy, complexity and support Ad hoc and broad based approaches
	To examine how a company targets a grassroots lobbying campaign in the European Union environment	Institutional environment Mobilising public	Targeting institutions European Commission, Parliament and Coucil Selecting a target group for mobilization
	To describe the implementation of a grassroots lobbying campaign in the European Union environment	- Channels - Goals	Internet and social media use Cultural impacts Risks

Table 3 Data coding

4.4 Evaluation of the research

A traditional way to evaluate the trustworthiness of a research is to assess the reliability and validity of it. However, because these two measures were initially developed to evaluate the trustworthiness of a quantitative research, they are considered to be the best way to assess a qualitative research. (Tuomi & Sarajärvi 2009, 137) According to Eriksson and Kovalainen (2008, 290) the selection of evaluation criteria should be compatible with the methodology of the research. This study will be evaluated with the four criteria of evaluation by Lincoln and Guba (1985, 300). Lincoln and Guba (1985, 300) state that a qualitative study can be meaningfully assessed with the four components of evaluation of the trustworthiness. These components are credibility, conformability, transferability and dependability of a study. These four criteria are especially useful in case where the data used in a study is primary data such in this study.

Credibility indicates to which extend the constructions of the research resemble the constructions in real world (Lincoln & Guba 1985, 29). In other words how well the conceptualisations and interpretations of the researcher resemble to the how the respondents of the research see the topic. (Eskola 1998, 213.). According to Lincoln and Guba (1985, 296-316.) the ways to increase the prospect of credible findings are prolonged engagement, persistent observation, triangulation, peer debriefing, referential adequacy and member checks. *Referential adequacy* was pursued in order to ensure credibility of the results. To confirm the referential adequacy all the interviews, except the interview conducted via email, were recorder and transcribed afterwards. The original version of the interview implemented via email was also carefully saved for the analysing phase. *Member checks* were also implemented to some extend during the interviews by restating the information collected from the participants to them and confirming that way the responses were accurately understood. However, due to the limitations in time and the availability of the participants, sharing all the findings with the interviewees after the study was not possible. *Prolonged engagement* was also conducted in this study in a sense that getting familiar with the subject of the study was started already a year before the data collection in a form of implementing a short pre-research on the topic of lobbying. This kind of prolonged engagement enables accurate interpretation of the data. *Triangulation* means that the data is collected from multiple sources and even with different methods. (Lincoln & Guba 1985, 301-304, 313.) In this study, the expert interviews were done with six different experts that had different kinds of backgrounds in lobbying and there were also interviewees from four different nationali-

ties, so it can be said there was triangulation in the sources of data. (Lincoln & Guba 1985, 301-304, 313.)

A study can be evaluated by focusing on the *conformability* of the study. This means evaluating the extent of which the results and recommendations are based on the data collected and used. If the conformability is high, another researcher can repeat the research in the bases of the information given in the study (Lincoln & Guba 1985, 300, 318- 319.) To increase the conformability of the study, the research process of this was conducted systematically and described in detail. The participants of the study also allowed the use of their names in the research paper, thus the data can be confirmed afterwards by anyone via contacting the participants. It has to be taken into account, that the background of the researcher might have a great influence on the interpretation of the data. The researcher has to be aware that this can affect the objectivity of the study. (Ghauri & Grønhaug 2002, 102.) Few of the participants of the study were familiar to me before the study was implemented. To avoid any biases that could have occurred when interviewing familiar participants or analysing results rising from the data collected from them, I aimed to be conscious of the possible biases and to avoid the chance that the familiar position these interviewees could have an effect to the conclusions based on the collected data.

Transferability of a study refers to transferring the outcomes of the study to a different environment. This can be useful when a researcher wants to make generalisations based on the results of the study. (Eskola 1998, 213, Lincoln & Guba 1985, 290.) Because of its explorative nature, this study is not aiming to achieve results that could be broadly generalized. In a qualitative study it is controversial how often a broad generalization can even be done. Describing the setting of the research, interviewees and data precisely can help the reader to understand the context of this research. This kind of detailed reporting increases the transferability of this study. The interviewees that participated the research all have experience on the field and knowledge that suitable to answer the research questions, which also straightens the transferability of the study. Yet, because of the scope of this study, the empirical data was collected with just six expert interviews and that can have an impact on how well one could make generalizations based on the results of it. Since the topic of the study is explorative and new, the goal of the study was not to be able to make broad generalizations but rather deepen the knowledge existing on the topic and potentially create hypothesis that can be tested in the future research.

Dependability studies how much the research is tied to the external factors. A research with high dependability is easy to repeat and other researchers can make same type of conclusions from the same data. A research with high dependability can be achieved through logical and clear reporting of the research. (Lee, 1999.) This research can be called dependable because the research design and the analysis of the data of this

study are clearly explained and described. In addition the interview questions are presented and the interviews recorded. Clear explanation and description on how the data is collected and analysed give the reader an opportunity to assess how the study is done and what kinds of decisions and interpretations a researcher has done during the research. In a qualitative research it might not be possible to do an exact repetition of the study. In this research the interviews were semi-structured, which means that the participants had a lot of freedom to concentrate on the issues they found most important at the time. Additional and specifying questions were also asked during the interviews, which might have an effect on the dependability of the research. Nevertheless in a qualitative study, the requirement of repeatability does not necessarily mean that a study must be able to be repeated in an exact way but that the researcher has to give detailed information of how the study has been designed and how the data has been analysed. This way the reader of the study can assess how the observations have been obtained and how they have been analysed. (Koskinen et al. 2005, 258.).

5 ANALYSIS

5.1 Selecting the grassroots lobbying tactic in the EU

5.1.1 Company and issue characteristics in grassroots lobbying

The first sub-objective of this thesis was to map what kind of factors influence the selection of the grassroots-lobbying tactic in the European Union level. In the theory part of the thesis, these factors were divided to company and issue characteristics. When it comes to the company characteristics, in the expert interviews it was mentioned several times that a company would more likely select the grassroots lobbying tactic if the tactic was already *familiar* to a company. This view was grounded on the example that in the United States, it is very common for companies to use grassroots lobbying tactic and therefore companies that are from the US are more familiar to the tactic and would be more likely to use it in any environment compared to the companies that are European or Asian. Laurinkari described that in American companies the processes needed for a grassroots campaign would more likely already exist and that would lower the barrier for a company to select the tactic:

> *In the United States, grassroots lobbying is more common and they have experience about it. They are used to the thought that you can use certain business processes also for this kind of a purpose. This makes it easier for the part of the company functioning in Europe to also use the tactic.*

Laurinkari elaborates that in a situation where the European department of the company might need advice on building a grassroots campaign, they could turn to the American departments that are more experienced with the use of the tactic. This argument can also support the claim that *organizational culture and structure* could have an impact on selecting the grassroots tactic, since the processes that exist inside the company could be described being part of the organizational structure.

According to the literature, a company with a *large amount of stakeholders* would be more eager to select the tactic of grassroots lobbying. In the interviews, the amount of stakeholders was not mentioned. However, Laurinkari proposed that companies who have a remarkable amount of clients that also follow them in social media could have a lot of potential for mobilizing those clients for grassroots campaigns. Instead of the amount of stakeholders, it was pointed out in the interviews that if *a firm or a brand of a firm is well-known* amongst the consumers, it has more potential for grassroots lobby-

ing. Because in the EU there are many different cultures and therefore many different sets of grassroots, a company should have a brand that is known in as many member states as possible to be able to successfully mobilise people across the EU. It was considered to be easier for a company with a well-known brand to mobilise people for their grassroots campaigns, because people would know what the company or a brand is about, maybe sympathise a company they know easier and also potentially understand the political issues a company is dealing with better. (Fox, Baneth 2014)

Even though Laurinkari mentioned the amount of stakeholders following a company in the social media as a characteristic that could have an impact on if a company selects the grassroots tactic, he also stated that in the end *the communications strategy and the culture of a company* have perhaps a bigger effect to if a company chooses to use the grassroots tactic than the amount of followers it has. He suggests that it would not, for example, be suitable for an image of a luxury brand to mobilize their customers for politics, because of their communications strategy is not to speak to the masses in general, but to appear more as exclusive. Laurinkari suggests that the grassroots tactic could be more suitable for companies that have more appropriate company culture for such a tactic. He proposes that the tactic suits, for example, eBay, because it has a *company culture* of consumers being an active part of the company's community:

> *From the beginning of eBay, there were discussion boards where the consumers and other users were asking advice, changing opinions and so on. This kind of a mentality suits also to grassroots mobilization, because people feel that they are part of a bigger community, where they are active users.* (Samuel Laurinkari 2014)

Based on the interviews, the *amount of financial resources* can impact on whether a company uses the grassroots lobbying tactic or not. The bigger companies tend to have a representation in Brussels where the EU institutions are located and also use associations to lobby. Because of that, larger companies might not need the tactic of grassroots lobbying to a great extent. In the literature review, Lord (2003, 16) similarly stated, that companies and industries that have a lot of financial resources would not find grassroots tactic very appealing, because they could invest in political contributions of different kinds such as hiring lobbying specialists. Furthermore, in the interviews it was proposed that in Brussels it would rather be the smaller companies that lobby through the grassroots tactic, since they would not have an equally large budget reserved for their lobbying activities and therefore the grassroots tactic might be more appealing to them than some of the possibly more expensive options. The experiences of Dunworth support this argument:

> *We're been forced into it (grassroots lobbying) really, we have no other option, but I think it's been quite effective. The thing that we have done, besides getting the protest going in the social media, is simply talking directly to MEPs and we do have an organization which does things in more formal basis and we have a single lobbyist in Brussels. But really the industry, mostly small, independent companies like us, can't really, doesn't have the same clout as the industries that are affected by electronic cigarettes.* (James Dunworth 2014)

Nevertheless, it has to be taken into account that not all the interviewees mentioned that the size of the company would affect whether or not grassroots lobbying is chosen as a lobbying tactic.

Interestingly, two of the interviewees were doubtful if grassroots lobbying would be a good tactic for a company to use at all. They proposed that the tactic of grassroots can be problematic for companies to use in general. It was suggested that a lot of people would not be willing to participate on a campaign run by a company, because they would be suspicious about the motives that a company has behind the campaign. It might be challenging for a company to find a transparent way to lobby with the grassroots tactic, since the arguments behind why a company wants to change legislation would be typically different than the arguments a company presents to the people it tries to mobilize:

> *A company wants to change this piece of legislation so it will not just go to the people and say that, but rather they will argument with the bases of how this will effect on the people in order to achieve a change. So from that point of view, it cannot be completely clear for those people what is the real reason, why they are campaigning to influence to an issue.* (Paul Fox 2014)

Worth similarly highlighted that an organization implementing a grassroots campaign should make sure they are clear and honest with their campaign, meaning that people participating the campaign should really know what the issue is and care about it. He argued it is essential that a campaign is transparently implemented.

Figure 8 summarizes the firm and industry characteristics that according to the expert interviews have an impact on the selection of the grassroots lobbying tactic in the EU. Compared to Figure 7 in chapter 3.2 the amount of employees is not included to the figure because mobilizing employees was not found a desirable tactic in the EU level by the interviewees. In addition, the amount of stakeholders in general was not brought out

as a characteristic of a company using the tactic. How well known company and brand were mentioned by several interviewees and thus added to the figure. *Familiarity of the tactic, organizational culture and structure* and *financial resources of a company* all came up in both literature review and in the expert interviews and therefore could be defined as key firm and industry characteristics.
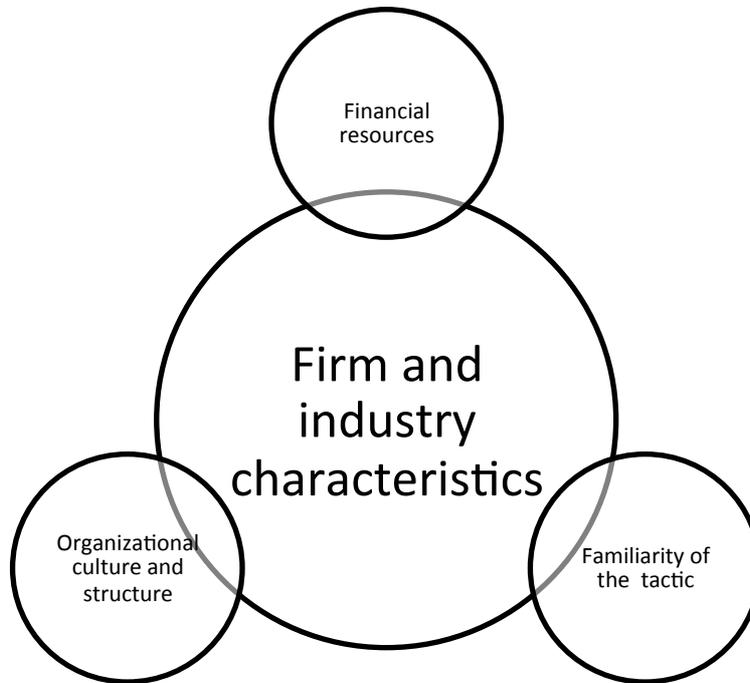

Figure 8 Firm and industry characteristics in the EU

The previous research on the topic suggested that the characteristics of a political issue could also have an effect on selection of the grassroots lobbying tactic. The interviewees had quite a unanimous view on which kinds of issues companies in the EU would select to apply the grassroots lobbying. Mahoney (2008) proposed that the size of an issue impacts on selection of the constituency building strategy because issues that are large are more successfully lobbied with constituency building strategy. Large issue refers to an issue that has a high impact on person's life. The interviewees' also described a political issue suitable for grassroots lobbying as the kind of an issue that has *a high and direct impact on consumer's every-day life*. In addition, Mahoney (2008, 152) and Lord (2000, 237) proposed that it would be problematic to build a grassroots campaign on issues that are complicated or difficult to understand. The interviewees' similarly thought that very technical, niche or abstract issues would not likely be suitable for grassroots lobbying, because they would not arouse consumers interest on the topic. (Baneth, Laurinkari, Fox, Salakari) Laurinkari, however, pointed out that if an

issue is very technical; it has to be explained to the consumer in a more understandable way:

> *This has been our challenge. How can such a technical sounding legislation still have an effect on people's every-day life? This has to be communicated in some clear way. You have to tell how this issue effects on persons every-day life.* (Samuel Laurinkari 2014)

Fox also argued that a technical issue has to be made simple for the target group that a company tries to mobilise:

> *For example, the data protection that is strongly linked to privacy issues and people might not understand the technical provisions of the text or regulation or directive of the data protection so you have to have a good idea of the key themes or issues which they recognize and which relate to them. You have to be able to identify the messages, which are themes and arguments, which affect them and would be most effective.* (Paul Fox 2014)

Baneth proposed that the political issue that is suitable for grassroots lobbying has to be the kind that can be *emotionalized*. Laurinkari also thought that a suitable issue for grassroots lobbying should be an issue that people feel *passionate* about. According to Salakari the issues suitable for grassroots tactic had to be issues that *people really care* about, for example health and money issues could be these kinds of issues. Furthermore, Dunworth considered that the electronic cigarettes industry has been able to mobilize a lot of people to support their campaign, because people *feel very strongly* about their product. Many of the clients who contacted the company had been smoking for a long time and therefore felt that electronic cigarettes saved their lives. What all these descriptions have in common is that they define an issue suitable for grassroots lobbying to be an issue that arouses very strong feeling in people. In other words, *the salience of an issue* impacts on selection of the grassroots lobbying tactic.

Figure 9 summarizes the issue characteristics that according to the expert interviews have an impact on the selection of the grassroots lobbying tactic in the EU. The literature review and the expert interviews found that the size and complexity of an issue have an impact on selection of the grassroots lobbying tactic. In addition, the importance of an issue to a person, in other words salience of an issue, was found to have an impact on selection. Three of the characteristics found in the literature review, *controversy, popularity and support,* were not mentioned in the expert interviews.
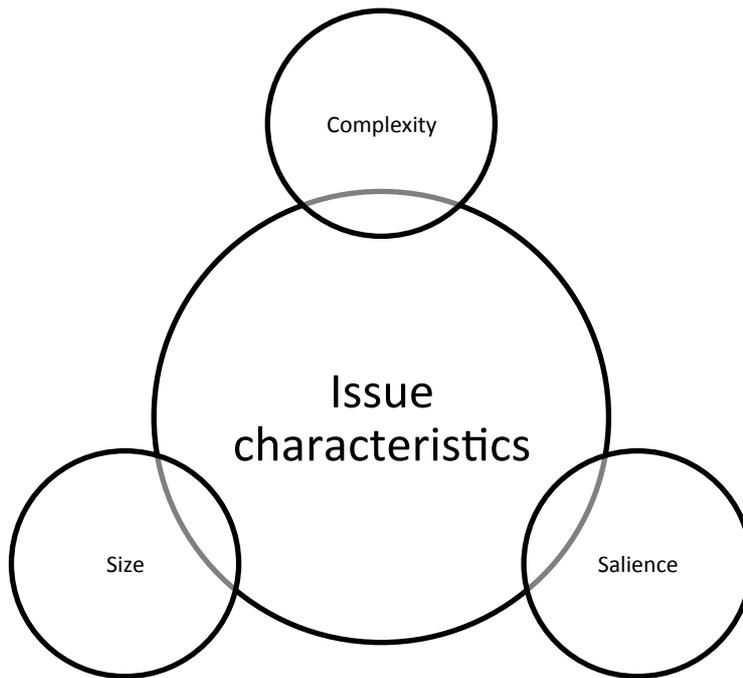
Figure 9 Issue characteristics in the EU

5.1.2   *Timing for a campaign*

Most of the interviewees thought that it is very important for a company to plan the timing of the grassroots campaign carefully to be able to make an impact. (Baneth, Fox, Laurinkari, Worth.) According to Baneth, Laurinkari and Fox, companies do not often understand how long it can take for a proposal by the commission to become a law. At the EU level, it can take three to four years for a proposal to become a law and it can become costly for a company to follow an issue during a long policy process, and to try to influence the decision- makers throughout that process (Joos 2011, Taminiau & Wilts 2006).

In the literature review on corporate political activity, the Life Cycle Model of public policy management was used to depict the development of an issue. According to Vanden Bergh and Holburn (2007, 2-3.) during the public policy formation phase the issue is significant in legislative and executive institutions and during the public policy implementation phase the policy is implemented by regulatory and judicial institutions. In the EU context this means that during the public policy phase the issue is processed in the European Commission, the Parliament and the Council and during the policy implementation stage the policy is implemented by the Commission and the member states.
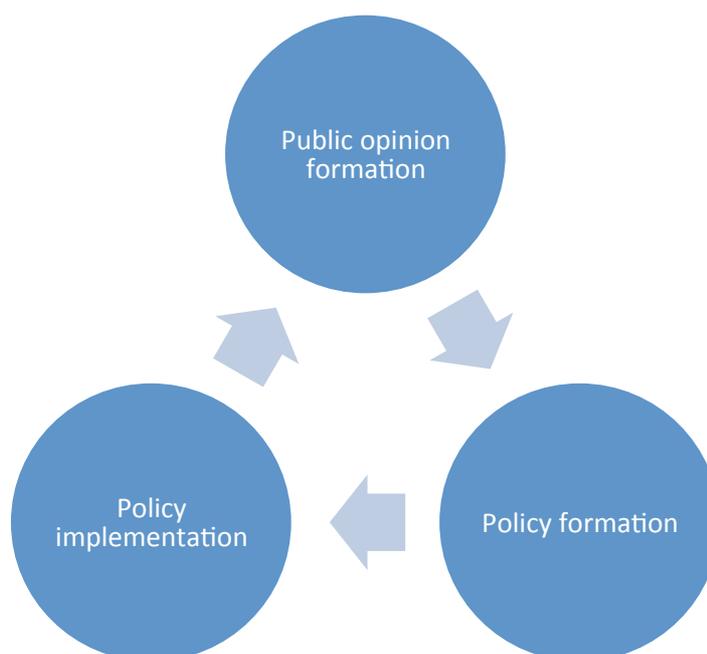
Figure 10 Life Cycle Model of public policy management

The review suggested that the public opinion formation phase would be the optimal time for a company to try to influence on an issue (Harris & Lock 1996, 319, Renfro 1993, 40, Marx 1990, 12, Jaatinen 1999, 85). A few previous researches even proposed that public opinion formation phase would be especially optimal phase to apply constituency building tactics, including grassroots mobilisation. (Hillman & Hitt 1999, Jaatinen 1999, 85.) In addition, Lock & Harris (1996, 318) proposed that lobbying often needs time to succeed because lobbying on just a single issue has a risk of being interpreted as a crisis response and is be seen defensive. However, the interviewees were not as unified in their opinions about timing as the results found from the previous research. Even if the interviewees agreed on the importance of the timing on campaign launching, they had differing opinions on what would be an optimal timing on the issue life cycle to launch a grassroots campaign.

Laurinkari and Baneth argued that a grassroots campaign could fail to influence decision-making if it started too early. According to Baneth a campaign that starts too early might gain some traction first but in the end it might are not able to affect the most important discussions from the decision-making point of view. Baneth also suggests the same kind of failure to influence can happen if a campaign is launched too late in the issue life cycle. Laurinkari pointed out that a danger of launching a campaign too early is that a campaign will lose its timeliness. Even though a company could use the results of a campaign throughout the policy process to prove that there is a wide support behind the company's opinion on the issue, the results would probably not feel relevant to deci-

sion-makers if they were several years old. Both Laurinkari and Baneth also argue that the grassroots tactic is often used when something has gone wrong in the influence attempts of a company and the lobbying has to be brought to the "next level". Laurinkari describes grassroots lobbying as a "nuclear bomb" tactic of lobbying and Baneth uses the phrase "bringing out the heavy artillery" when talking about grassroots tactic. Laurinkari and Baneth state that when more conventional lobbying tactics do not seem to work for some reason, grassroots tactic is used.

One of the reasons there is a difference between the views of Laurinkari and Baneth and the literature review might be the fact that the decision-making process is exceptionally long in the EU, often lasting three to four years. The previous research has viewed corporate political activity mainly from the United States or general point of view whereas in this study the interviews were concentrating on lobbying in the EU environment and therefore it might be that the opinions of some of the interviewees differed from the previous research.

However, the view that the public opinion formation phase would be an ideal time to start campaigning also gained support among the interviewees. Contradictory to Baneth and Laurinkari, both Fox and Worth thought that there would be advantages in campaigning early. Both of them highlighted that a grassroots campaign should start as early as possible. Fox proposes that the public opinion formation phase is the most effective timing to start a lobbying campaign, because that is when a company is able to start a public conversation about a certain issue and set the terms of the conversation.

> *If somebody else will be able set the terms and the tone of the conversation first, it can be very difficult to try to change the tone of the conversation by a campaign. A later timing might mean that a legislative initiative has already come out with some others agenda than the company's.* (Paul Fox 2014)

According to Worth the longer the political process runs, the more entrenched positions get, and therefore the opportunity for an organization to shape the process diminishes. Thus the prospect to shape the political process should be better earlier the lobbying starts. However Worth noted that it might be problematic for an organization to know its position very early on. He described a start of campaigning be "a race against time", because organizations have to work out their positions as far as possible as fast as they can, and then quickly start their campaign.

These differences in opinion might illustrate a contrast between two conceptions of grassroots lobbying. Laurinkari and Baneth seem to view grassroots lobbying very similarly to the ad hoc approach as described by Dunn (2000, 17) in which the grassroots tactic is used because a company has an immediate legislative need or threat. Baneth

and Laurinkari describe grassroots as a reactive tactic for situations that are "desperate", characterized by "helplessness and frustration", for use as a "last resort", or as "bringing in the heavy artillery" to increase the pressure when issues need to become very visible and options for private dialogue with policymakers have been exhausted.

Fox and Worth on the other hand, use a more positive, active vocabulary where there are constructive opportunities to set the agenda before any problems in the policy making process arise or as part of a strategy that shapes issues in a way that is favorable for those planning the campaign. The reasoning of Fox and Worth is that with the grassroots tactic an organization can avoid problems in the process as it can prevents issues from escalating to the point where "desperate measures" are needed.

Another timing related issue that came up in the literature review was whether a company should take ad hoc or continuous approach on the grassroots tactic. According to Laurinkari the citizen's organizations have the option to do grassroots lobbying as a continuous strategy, because their members have political reasons to take part in their activities. The constituents of a company tend to need more prompting than the members of a citizens group before taking action, because for the clients of commercial companies political motivation is not the main reason they would be in contact with the company. Laurinkari describes the problem:

> *A client of eBay is not a client of eBay because he has some kind of a political motivation to join eBay's campaigns or participate in legislative process that influences eBay's business, but the reason is that he wants to buy products in a certain way.*

From this point of view it can be reasoned that a campaign should not be started too early. If an issue life cycle lasts 3-4 years, it could be challenging to be able to encourage constituents of a company to participate in campaign throughout the whole process. Similarly, Dunworth points out that it is not the most difficult part to get people activated, but to keep them activated during the long political process:

> *It is difficult to keep people contacting the decision makers and campaigning though. I think there's maybe a core of seven hundred people who are very active and these other people they do care about it but they have to be pushed to take action.*

For the electronic cigarettes companies the grassroots campaign has been continuous, because it has been one of the main tactics the companies have used to influence the tobacco directive of the EU. Dunworth highlights that the long policy process has indeed made in very challenging to keep the constituents active and interested of the is-

sue. There are two kinds of propositions found from the expert interviews. First proposition being that for a commercial company grassroots lobbying cannot be a continuous process but rather an ad-hoc activity and contrary to that a proposition that it is absolutely necessary for a company to have an on going grassroots strategy to be successful:

> *I think to be effective, yes you have to be on going, so of course the reality and what might be ideal might be different, but for a company, lets say Microsoft, who does have very established way of drawing a community of people and turning them into, not just brand ambassadors but also brand ambassadors in a policy context and at least to make further contacts and use them as a network is very important.* (Paul Fox 2014)

Even though most of the interviewees had an opinion of at which point the grassroots tactics should be applied, it is also added that there can be different strategies that influence the starting point. Fox proposes that there are two kinds of starting points on grassroots campaigns. The first one is that there is that the company starts a conversation about an issue without there being an existing initiative about it and the second one is that the company throws a campaign when the issue is already on decision-making process so there is an initiative. He thinks that the ideal would be that a company would be able to start a campaign before anyone else has done an initiative on the issue, so before the decision-making process has started, then the company would be able to set the tone of the conversation but recognizes that a campaign can also be started later in the policy process.

Laurinkari divides the types of grassroots campaigns into two according to what is the aim of the campaign. The first type of campaign aims to influence a specific problem that has occurred in the decision-making process. The second type aims to create more general political atmosphere on a wider issue and raise the awareness on the issue even though there is no decision-making process going on around the issue yet. In the first type of a campaign, the decision-making process influences the campaign process. The decision-making process creates the time frame for the campaign for example by defining how much time there is for the campaign, which are the decision-makers who the campaign tries to influence and so on. If a company wants to do a second type of a campaign it has more freedom to decide what should be the timing or what issues it wants to rise in a campaign. However, for example right after elections this kind of a campaign could be most effective to set the agenda for the newly elected decision-makers. Laurinkari also recognizes that a campaign can be started very early on, but considerers these kinds of campaigns to have a more general aim to influence on the political atmosphere rather than a specific regulation.

Based on the interviews and the theory of Dunn (2000, 17) presented in the literature review, two hypotheses were formulated on in which point of the issue life cycle and how a company should use the grassroots lobbying tactic:

1. AD HOC APPROACH: With this approach the tactic is used later on in a issues life cycle, in case a threat is identified and influencing the policy process with other tactics does not seem successful. The grassroots tactic is viewed as the "nuclear bomb tactic", which becomes attractive in the point nothing else seems to work.

2. BROAD BASED APPROACH: With this approach the tactic is applied as early as possible in the issues life cycle to use the opportunity to set the agenda and the tone of the conversation. The tactic is used to prevent the conversation on the issue to develop to undesirable direction.

5.2   Targeting the grassroots campaign in the EU

5.2.1   Which institution to target

The goal of grassroots is to build a relationship between the person mobilized and the legislator or regulator that the organization is trying to influence and to build a relationship between an organizations grassroots network and the person mobilized (Grefe 2000, 4). This chapter will analyze the results of the interviews about building a relationship between the person mobilized and the legislator. After this, the chapter 5.2.2 will analyze building a relationship between an organizations grassroots network and the person mobilized.

Most of the interviewees considered that the first steps in planning a campaign should know which institution a company wants to target with their campaign and identify key decision-makers within that institution. According to the literature review, the three most relevant institutions from corporate political activity point of view in the EU are the European Commission, European Parliament and European Council. Each of these institutions represents different interests the Commission representing the interests of the EU as a whole, the Parliament representing the EU citizens and the Council representing the member states. (Joos 2011, 118, Vaubel 2009, 26 McCormick 2011, 78-84.)

When a company chooses which institution it is going to target, it has to take into account the complexity of the EU decision making process, and the fact that the process can take a very long time. These three institutions mentioned above, are at the core of the decision making process there are three institutions. Almost all of the interviewees mentioned how important it is for a company lobbying at the EU level to understand the role of different institutional players and how the legislative process in the EU works to be able to influence the decision making effectively. (Baneth, Laurinkari, Worth, Fox, Salakari)

> *The main error that is often made is a lack of attention to the legislative process, i.e. you got to understand how the Brussels process works to work out how to build grass-roots campaigning activity here. What you got to do is not only complain there's a problem, but understand where that problem is and work out what your solution is and what ought to be done differently and by whom.* (Jon Worth 2014)

The interviewees had very unanimous opinions on what kind of characteristics the EU institutions have from the corporate political activity point of view. The interviewees considered *the European Parliament* to be the easiest and the most obvious target for a grassroots lobbying campaign. The Parliament is attractive target for a campaign because the members of the Parliament are elected to their position by the European citizens and therefore they are interested to know what their constituencies think and what the public opinion is of issues they work with. Because the members of the Parliament are voted by the EU citizens to the Parliament, they also have the pressure of having to please their constituencies if they wish to get re-elected. (Laurinkari, Fox, Dunworth, Worth, Baneth, Salakari)

Even though the Parliament was considered to be the most obvious and successful institution to target with a grassroots campaign, it was remarked that in the Parliament a company might have to compete for attention with other companies and organizations. Because the Parliament is the most visible, open and accessible EU institution for the outside pressures, there are a lot of different organizations trying to influence it. Since many organizations are campaigning and trying to influence the members of the Parliament, it might be difficult for a company to trigger their interest and get visibility to the issue. (Baneth, Worth)

The European Commission was also mentioned by most of the interviewees as a potential target for a grassroots lobbying campaign. (Laurinkari, Fox, Baneth, Worth, Salakari) Fox saw the Commission as a potentially very interesting target for a campaign, because it is the only institution that can initiate legislation in the EU. The Parliament and Council can only amend and vote on the initiatives of the Commission, which

means that the Commission has most power in the EU in terms of setting the agenda. In addition, Baneth and Worth suggested that even though people working in the Commission might be less interested about the public demand, they regularly still have some capacity for listening to interest groups. Because the people working for the commission are not usually lobbied as intensely as the members of the Parliament, they might have more interest and undivided attention to different issues lobbied by organizations.

All the interviewees considered *The European Council* to be the most difficult EU institution to target with grassroots lobbying campaign (Baneth, Dunworth, Fox, Laurinkari, Salakari, Worth). The Council is formed by the member state representatives and therefore Fox argued that when an issue comes to the EU level, the representatives of the member states have already formed some kind of a national approach on the issue. The interviewees argued that because the Council represents the interests of the member states, if a company wants to influence the Council members, they would have to run a campaign on the member states level rather than trying to target the member states at the EU level. The Council is seen as a more difficult target for a grassroots campaign, because the decision-makers in the Council tend to have more "local" agenda on the issues, meaning they look at the issues from the member state point of view. The best way to influence the Council is suggested to be running a grassroots campaign in a member state level instead of trying to target the Council.

Besides choosing an institution to target, another key decision for a company, according the interviewees, is to decide whom a company will target within an institution. The interviewees thought it is extremely important for a company to know who, in the EU institutions, has political power regarding the issue and to be able to identify the key influencers working on an issue. (Baneth, Worth, Laurinkari, Fox)

Many of the interviewees think that the first step a company has to take when starting to plan a grassroots campaign is to identify who are the key decision-makers that a company is trying to influence with the campaign. The decision-maker the campaign is targeted is seen not something a company can necessarily choose. Even if the campaign was more general campaign trying to influence on the political atmosphere instead of a specific regulation, the incentive for a company to launch a campaign usually comes from the fact that company wants to communicate to a certain decision-maker-group. What sparks the campaign is that a company wants to encourage a certain way of thinking amongst the certain decision-makers:

> *What I think is very important is that you got to work out what is your clear demand, what is the signal that you send to politicians. If someone is on the receiving end of your campaign, it should be made clear for them what the campaign means and why to take it seriously.* (Jon Worth 2014)

Laurinkari argued that each commissioner has a different portfolio and point of view that comes with it. He thinks a company can target several different commissioners with their campaign if they take into account these different points of view. For example, eBay's campaign was about a file where the key commissioners were in competition issues and digital issues. In addition, commissioners with portfolio with single market, industry and consumer issues all had their own interests in relation to the file. Laurinkari points out that if multiple decision-makers are interested in the issue, a company can bring out different kinds of elements to their campaign and try to influence several different decision-makers with it.

5.2.2   *Identifying the campaign's participants to be mobilized*

Many of the interviewees believed that the choice of target group for mobilization is dependent on which decision-maker the company wants to influence with the campaign. Laurinkari argues that it would be beneficial for a company to choose the group they try to mobilize based on whom they want to influence. As an example, Laurinkari described that if a company wanted to target a commissioner with an industry portfolio with their campaign, they would very likely decide to try and mobilize small and middle-sized companies, because concerns of SMEs would be in the interest of the commissioner with an industry portfolio. In other words, when choosing a target group to mobilize, a company should think about what the campaign is going to look like from the decision makers point of view and why it would be appealing to the decision maker to listen to the people that the company has mobilized.

Several interviewees also mentioned that on the EU level the company should mobilize people widely from different EU countries with their grassroots campaign. Laurinkari mentions that in eBay's grassroots campaign the target group was a wide user base of consumers and SMEs from the EU countries where eBay had most clientele. Laurinkari believes that on the EU level it is politically wise to aim for the largest mobilization possible, because larger campaigns will have a greater influence on the EU institutions.

Some of the interviewees did not agree with Laurinkari about the largest mobilization possible being the politically wisest move. According to Fox, it would be much more effective to mobilize a certain constituency that is important for a decision maker, rather than just trying to mobilize as many people as possible. He argued that it is important to bring the movement as close as possible to the politician or the policy-maker involved and to try to find a direct link or objective for them. Laurinkari also highlight-

ed the importance of tailoring the campaign for the decision-maker that is targeted, but in addition to that he believed a wide campaign would have most influence in the EU.

Like Fox, both Baneth and Worth both also argue that grassroots campaigning is not just a numbers game. They argue that that there is also a lot of balancing going on between different stakeholders. How effective of mobilization is also ties back to the way that each institution works. For example, because the members of the European Parliament are elected from the member states, their priority is to listen to the citizens that vote in their own electoral area. In contrary, in the Commission the member state or a region from which the people participating the campaign come from might not be an important factor since the Commission members are not elected the by the EU citizens and are supposed to represent the interests of the EU as a whole. This balancing between stakeholders leads to most grassroots efforts being complex and require that the organizers of the grassroots campaigns are sensitive to the various factors and forces that motivate the campaign's target:

> *Because if your MEP is going to be a rapporteur for the Greek bailout and then he gets a petition with 27 258 signatures from the Greek citizens at the same time, he might get 8542 from German citizens who are concerned of where their money is being spent, and the other 4200 from Finnish citizens who are concerned about how he represents their interest. Now, how do you measure that? Which has the most weight to him?* (Andras Baneth 2014)

All of the interviewees suggested that a company usually tends to mobilize either their customers with the grassroots tactic or possibly other companies that have similar concerns about the political issue. Only Baneth and Laurinkari brought up the fact that a company could also mobilize its employees in the interviews. They both think that involving employees of a company to join that company's political activities would very likely not work in the EU although it is common in the US. Trying to involve the employees to a political grassroots campaign would very likely be considered inappropriate in the EU, because of the cultural reasons and how the relationship between employee and employer is seen in the Europe. In the EU, mobilizing employees with a grassroots tactic would very likely be seen as an employer trying to pressure an employee to have certain political view:

> *In the US it is typical, for example, that companies remind their employees that now the elections are coming, you should use your right to vote. We, in Europe, had a similar conversation before the European parliament elections, that now the European elections are coming, should we*

remind our employees to vote. In the end we came to the conclusion that might make people feel like they are pressured by their employer to do something political. I think it might be that the politics is more personal in Europe than in the US. To refer to something political is seen to be inappropriate and can create a scandal. (Samuel Laurinkari 2014)

To summarize, according to our interviewees, it is important to have a good number of people from several different EU countries participating a grassroots campaign, but the number of people mobilized might not be the only important factor. A company should also to be able to target the campaign to a certain decision-maker based on what are the interests and concerns of the decision-maker. The number of the participants of the campaign might not be the most important thing when aiming for a successful grassroots campaign, but a company should also see the situation from the point of view of the decision maker and mobilize stakeholders that are important to the decision makers. A possibility of a company being able to mobilize its own employees does not seem very familiar to the interviewees. Only two of the interviewees mentioned the possibility of a company to mobilize its employees in the interviews. These two interviewees believed that this kind of a mobilization might not be considered appropriate in the EU environment, because of the cultural reasons and because the politics is possibly considered to be more personal topic in the EU that should not be related to the professional life of a person.

5.3   Implementation of a campaign

5.3.1   *The impact of culture to the implementation*

In the literature review Mahoney (2008, 149-150) considered the multiple official languages in the EU problematic for the development of the EU wide media. Mahoney proposed that the numerous languages in the EU and as a result of that, the absence of Union-wide media it can be problematic from the constituency building point of view. In the interviews several interviewees also brought up the challenges the different languages and cultures in the EU can create for the use of the grassroots tactic. Laurinkari suggested that if a company wants to mobilize a consumer in the EU, the mobilization has to be done in the consumers' own language or otherwise the campaign would not be effective. In the EU this would mean that the campaign would have to be translated to multiple different languages.

Many of the interviewees brought up the impact of cultural differences in the EU to the grassroots tactic. They argued that most successful grassroots campaigns are usually local and appeal to a certain demographic. There are a lot of cultural differences between the EU member states and therefore it is proposed that a successful grassroots campaign should be well targeted to its group that an organization wants to mobilize. Because the EU is formed by a set of member states that are separate and culturally different, a company should, at least to some extent, tailor its campaign to be suitable for the stakeholders in different kinds of cultural environments instead of running the same campaign in all the member states. In in the EU level, a campaign has to be successful across the entire European demographic to be able to influence. This goal can be difficult to reach because of the differences in cultures, languages and societies in the EU. Another option to tailoring a campaign when aiming to be successful at the EU level could be having a topic that raises interest widely in different EU-countries. (Baneth, Fox, Salakari) As examples, Baneth and Salakari considered that topics that are able to arouse wide interest in the citizens throughout the member states could be for example issues such as health, environment or food safety. In other words, issues that concern the everyday life of most of the people.

Even though the lack of an EU wide media, the amount of languages and cultural differences can all be problematic when using the grassroots tactic, Mahoney (2008, 163-165.) suggested that an organization does not necessarily need a broad media or mass communications to mobilize people. Therefore, Mahoney (2008, 163-165.) argued that there must be additional reasons why in the EU the use of the grassroots tactic has been moderate. Mahoney thinks the lack of democratic responsiveness of policymakers could be one of the factors why constituency building is still not very common in the EU. Many of the interviewees likewise believed that there exists *a conceptual distance between the EU and the EU citizens* (Baneth, Laurinkari, Salakari). Salakari proposed that the EU politics does not seem to be very close to the EU citizens. He argued that the EU-wide grassroots campaigns could sometimes fail because people might lack interest towards the EU issues. This lack of interest might be a result of the citizens not fully understanding the effect of EU-politics to their lives.

In the literature review Joos (2011) was anticipating tha because the Treaty of Lisbon increased the powers of European Parliament that represents the interest of the EU citizens, the citizens of the EU would have a greater role in the lobbying strategies in the future and grassroots tactic would become used more and more. However, Baneth argued that even though the EU has gained more political power in recent years, it seems that the EU citizens have not yet understood how much influence the EU level decision-making has to their everyday lives. Because of that, the EU citizens might not also be very interested to participate on political campaigns in the EU level. In chapter 5.1.1 the issues suitable for a grassroots campaign were inter alia described to have characteris-

tics such as that they impact on people's everyday lives, are not too technical and arouse strong feelings in people. When based on the interviews, the EU issues could feel distant to the EU citizens which might decrease their willingness to engage on political campaigns in the EU level. One way for a company to try increase the probability of people engaging to grassroots campaigns could be presenting the political issues in more understandable way to the people and highlighting the effect of these issues have to peoples everyday lives. Based on the literature review and the interviews a hypothesis could be formed that these could be potential ways to decrease the distance between the political issues and people.

5.3.2 Implementation channels and risks

According to Titley (2005, 222), the fast development of Internet has lowered the barrier of the public to participate political influencing. Many of the interviewees similarly mentioned that ever improving availability and growth of the Internet has increased the amount of the grassroots lobbying campaigns in the EU and most of these campaigns are nowadays implemented online. (Dunworth, Laurinkari, Fox) Laurinkari described that eBay ran its EU wide grassroots campaign in 2009 mainly online. eBay emailed their users to explain what the political issue they wanted to influence on was about and encouraged them to participate in their campaign via signing a petition. The petitioning was done within the European citizens' initiative scheme and then presented to the European Parliament and the Commission. Ecigarettes direct and its founder Dunworth also ran their grassroots campaign mainly online:

> *We already had quite a lot of interaction with the customers, because we had been blogging for a long time. As for the way we did it, we did not create a website and this is how you do it, in our blog we pointed people towards excising websites such like write to your MEP, write to your representative and suggested they use that. We also worked with other organizations to collect some signatures. In each of our shops we had a signature box where you could sign a form and put it in and then we would sent it to another organization which collected them and sent it to the EU.* (James Dunworth 2014)

All of the interviewees considered two of the most common channels in grassroots lobbying to be *email* and *online petitions*. A company can urge the target group to send their political representatives an email or provide a template for an email that customers use when contacting decision makers or customize these templates themselves. A com-

pany can also contact their target group via email to encourage them to sign a petition. (Baneth, Dunworth, Laurinkari, Salakari, Fox) A petition refers to signing a statement or a demand, which is administered by a company or an organization. According to Baneth, when it comes to petitions the power usually lies in the numbers. The more people sign a petition, the more impact it is going to have. Laurinkari also believed that often the number of signatures was an important factor in the success of the petition, meaning that petitions with more signatures would probably have more influence on the decision-makers than petitions with fewer signatures. Baneth pointed out that the authenticity of the people who sign a petition can be difficult to prove and this uncertainty might harm the reliability of the petitioning. Baneth argued that there is always a risk that the signatures in a petition are not real. Nevertheless, he mentioned that there also exists some professional petitioning websites in the EU that have tools aiming to make sure the signatures collected via petition are from actual citizens.

Bergan (2009, 329) argued that the cost of the communication to the decision-maker is dependable on the communication channel a constituent uses. Sending an email is very fast and available for many Europeans and therefore the cost of it might be considered so low a decision-maker might not consider an email to indicate strongly enough that the issue is important to the constituent. Laurinkari and Baneth also mentioned *letter writing* as an interesting channel for implementing grassroots tactic. Laurinkari proposed that in the campaigns with smaller amount of participants, letters could be an optimal tool. He, similarly to Bergen (2009, 329), suggested that because letter writing takes more effort from the constituent and the cost of communication is higher, a letter could have a bigger impact on the decision-makers. Furthermore Baneth argued that letter-writing campaigns might be on their way to become more effective in the future than emails:

> *Maybe the letter will have its renaissance, because e-mail has basically no barrier to entry. Lower barrier to entry is, the less the impact the tool has, because anyone can send an email.* (Andras Baneth 2014)

When it comes to implementation of a grassroots campaign, many of the interviewees argued that one of the most important things for a company is to have *a clear objective* on the campaign. It is easier for a company to measure how successful the campaign is if it was well defined what a company wanted to achieve with the campaign. Moreover, it is proposed that people tend to be more willing to engage in a campaign when they know specifically what they are trying to achieve with their participation, they agree with the goals of the campaign and know that these goals are realistic:

Campaigns which are too broad or too wide or too unclear genuinely just breed discontent, because the EU institutions need to basically know, ok if we got a mass mobilization no matter which size or which grass-roots network, what do you want us to do, what is your desired concrete outcome. If your grassroots mobilization doesn't have that, clearly de-fined, then you're probably not going to achieve campaign success. (Jon Worth 2014)

Even though many of the interviewees argued that the clear goals would increase the willingness of people to participate a campaign, Baneth and Dunworth considered that it could be very difficult to engage people to participate to a campaign that would require more action from them than signing a petition or writing one letter. In other words, the barrier of entry to a campaign cannot be too high. As an example, Baneth suggested that travelling to European institutions to demonstrate an opinion on an issue from member countries is something that people would generally consider to be too high barrier of entry and take too much time and resources. Dunworth described that in the campaign Ecigarettes direct is involved in, there is maybe a core of 700 people who are very ac-tive and care about the issue on a personal level. His experience was that the other cam-paign participants have to be constantly encouraged to take action or otherwise they would not do it after the first effort, for example writing to their decision maker. These descriptions of the amount of effort mobilizing people takes suggest that timing of the campaign has to be very carefully planned as also proposed in the chapter 5.1.2. When the policy process takes several years and a company might be able to mobilise the tar-get group to contact their decision-makers only once, it could be a key decision for a company to decide in which point of the issue life cycle their mobilisation campaign will be launched.

. Worth notes that another decision related to the implementation of a grassroots campaign is that an organization has to also plan how they are going to combine the grassroots tactic with their classical advocacy. He argues that implementing only a grassroots mobilization campaign is often not effective. Worth suggests that in the Brussels institutions the grassroots tactic is not always necessarily the best way of achieving the results wanted, but it can be a useful component of an organizations over-all strategy As brought up in the literature review, in the research by Kollman's (1998, 41) there was also an observation that the constituency building strategy is usually not implemented alone, but combined to other lobbying strategies. Laurinkari similarly thinks that grassroots tactic should be only part of the company's strategy on how they are going to influence on a political issue. Laurinkari describes most of the EU initia-tives to be very technical and therefore he thinks that the information strategy on lobby-

ing, such as writing detailed position papers to decision-makers is also very important part of the corporate lobbying.

When talking about the implementation of grassroots campaigns, some of the interviewees believed that selecting a grassroots tactic could be quite risky for a company. Fox particularly stressed that there usually are risks involved in grassroots mobilization tactic when a private company is using it, as opposed to for NGOs. He proposes that the motivation that a company has for pursuing a campaign may include strategies of growth or profit, and these motivations may not be explicitly put forward in the campaign argumentation. Fox posits that the issues and arguments put forward in a grassroots campaign do not necessarily relate directly to a companies' reason for pursuing the strategy. He suggests that this disparity may cause a negative image risk for the company, as it is seen as a suspicious activity that is separate from an NGO's campaigning, despite the two being similar in many other respects.

> *The risk is that you expose the company to having a negative image or to be seen in a bad way. There's a very deep suspicion on lobbying as a profession as an activity and if a company is seen to be lobbying, it has to be very careful. It's very different from an NGO, which is campaigning.* (Paul Fox 2014)

Laurinkari also thinks there are risks related to the grassroots tactic usage of a company. He describes that normally the corporate political activity is not implemented as publicly as during the grassroots mobilization campaign. Corporate political activity or lobbying has quite a negative connotation and companies have to be sensitive how they present their political views to the public. Even though the arguments presented may be identical to those presented through other lobbying methods, when they are presented through a grassroots campaign, the grassroots tactic usually gets more negative attention. Because the aim of a grassroots campaign is to draw as much attention to the issue and the views of a company as possible, it is almost inevitable that some of this attention will also be negative.

6   CONCLUSIONS

6.1   Theoretical implications

The purpose of this study has been to explore the ways in which grassroots lobbying is used in the European Union, and by doing so, to enhance the knowledge and understanding of the issue within academia. The main objective of this research was *to explore how companies use the tactic of grassroots lobbying in European Union environment.* The objective of this research was divided in the three following sub-objectives:

- *To map what kind of factors influence the selection of the grassroots-lobbying tactic in the European Union level*
- *To examine how a company targets a grassroots lobbying campaign in the European Union environment*
- *To describe the implementation of a grassroots lobbying campaign in the European Union environment*

This thesis provided new insights and perspectives on the grassroots-lobbying tactic, both in the general sense, and in the EU-specific sense. Grassroots lobbying is a new and under-researched concept in corporate political activity and therefore there is the need to expand the existing knowledge about it and its use in the EU context. It is also worth pointing out that, although the theory part that this thesis is build on was largely formulated in a US context, the theory still in many ways captured the experiences of the experts in the EU context. Therefore, in addition to gaining new insights and propositions on the topic, this study was successful in providing empirical validation for the theoretical propositions found from the literature, finding that the expert accounts of our interviewees could successfully be interpreted through the theory.

This thesis contributed to the theory of which factors influence selecting grassroots lobbying tactic. *Factors influencing the selection* of the grassroots-lobbying tactic found in the literature review *were issue characteristics, firm and industry characteristics and the institutional environment*. The expert interviews established that all of these factors are relevant for a company to consider when implementing a grassroots-lobbying tactic. *The familiarity of the tactic, organizational culture and financial resources* were confirmed by the expert interviews to be the most influential factors on selection. In addition, some new characteristics were proposed based on the empirical data collected, such as awareness of a consumer of a company or its brand and popularity of a company in social media. The importance of these factors could be tested in the future research. The issue characteristics established based on both in literature review and in the expert interviews were the issues size, complexity and salience. The interviewees did not mention some of the issue characteristics noted in the literature review such as the

popularity of the issue and the support behind the issue. It could be that in the EU environment these characteristics are not as important from the grassroots lobbying point of view as the size, complexity and salience of an issue.

Furthermore, this study provided new contributions on the different possible approaches to grassroots lobbying. Two approaches found from previous literature were *ad hoc approach* and *broad based approach.* The definitions of these two approaches were broadened and propositions were formed on what timing should be selected for each approach. Some propositions were also formed on the characteristics of these approaches. Contrary to the theoretical suggestion that lobbying should be always started as early as possible in the issue life cycle, it was found that an optimal timing for a campaign could vary.

Ad hoc approach in grassroots lobbying was proposed to be used later on in an issues life cycle, in case a threat to the desired outcome of the policy process was identified and influencing the policy process with other tactics did not seem successful. In the ad hoc approach the grassroots tactic is viewed as more powerful but also more risky corporate political tactic to be used when the more traditional forms of lobbying do not seem to have a desired effect. *In the broad based* approach the theory suggests that the grassroots tactic should be applied as early as possible in the issue life cycle. In this conception, the broad based approach sees the grassroots tactic as beneficial in agenda setting and influencing the tone of the conversation surrounding an issue.

It was also found that the EU environment is very complex and has its specific characteristics that should be taken into account in the theory. When it comes to grassroots lobbying for example, it should be considered in the light of the long life cycle of a political issue in the EU, is starting to lobby early always desirable. From the expert interviews it was clear that some of the interviewees suggested that it would be better for a company to implement grassroots lobbying tactic later in the policy process. These interviewees grounded their argument on the fact that in the EU environment the political process can take 3-4 years and if a company starts a campaign too early, the campaign might not influence the most important decisions done later on. Based on this it was proposed that the optimal timing for a grassroots campaign could be dependent on the characteristics of the political process of the non-market environment a company lobbies at. The figure next page summarizes the theoretical implications found in this study.

Theoretical implications	The familiarity of the tactic, organizational culture, financial resources and amount of stakeholders have an impact to the selection of the grassroots tactic.
	When an issue which has high and direct impact on lives of people, arouses strong feelings and is not very complex, the grassroots tactic is more likely selected.
	Timing and how grassroots tactic is seend depends if a company has ad hoc or broad based approach to the tactic.
	The optimal timing for a grassroots campaign could be dependent on the characteristics of the political process of the non-market environment a company lobbies at.
	The EU environment is very complex and has its specific characteristics that should be taken into account in the theory.

Figure 11 Theoretical implications

6.2   Managerial implications

Based on the findings of this thesis there are, in addition to the theoretical implications, some managerial implications that could be suggested. The most important insight related to the implementation of a grassroots campaign provided by this study is perhaps that when planning a grassroots lobbying campaign a company should think how the campaign will look from the point of view of the decision maker they want to influence. The choices such as who to mobilize with a campaign and which channels to use could be oriented towards answering the question "is this group of people or a channel of communication going to catch the attention of the decision maker".

Secondly, the complexity of the EU institutions and the policy process in the EU were highlighted in both literature review and in the data collected through the expert interviews. The interviewees considered it to be extremely important that a company lobbying at the EU level understands the roles of the different institutional players and how the legislative process in the EU works. The knowledge and deeper understanding of the political environment can help a company to be able to influence the decision making more effectively.

Furthermore, the tactic of grassroots lobbying was introduced in the study. The grassroots lobbying tactic seems to be still a relatively new and unused lobbying tactic at the EU level. However, many authors have predicted that this tactic will become increasingly attractive for the companies in the coming years. Growing use of Internet and

social media combined with increasing powers of the EU institutions might lead to the situation where the public is more and more interested to express its views and try to influence political issues. A company could seek for competitive advantage in terms of influence by engaging the public to participate in their political campaigns through a grassroots campaign.

In addition, this study could provide tools and points of view for the managers planning and implementing a grassroots lobbying campaign. Most of the interviewees considered that the first steps when planning a grassroots campaign should be identifying which institutions a company wants to target with their campaign and who are the key decision-makers regarding the issue within these institutions. Again, the knowledge and understanding of the EU institutions appear to be great assets when implementing lobbying in the EU level.

In the expert interviews a lot of practical suggestions on planning a grassroots lobbying campaign were found. When considering the size of a campaign, two different points of view came up. When launching a grassroots lobbying campaign at the EU level, it is important to have a good number of people participating from several different EU countries for a campaign to be relevant. Nevertheless, the number of participants is not necessarily the only important factor. It seems like a company should also consider how to target the campaign to a certain decision maker based on what interests and concerns the decision maker has. A company can also leverage the smaller number of participants in those cases where the participants feel very strongly about the issue.

Regarding what channels to use in grassroots lobbying, both the literature review and the interviews noted that when choosing which channel to use in grassroots lobbying, the cost of the communication should be taken into consideration. It could be beneficial for a grassroots campaign that is small to use channels that are more costly, for example letters instead of channels that are lower from their cost such as emails. With the channels that have higher cost of communication the high importance of the issue to the participants could be communicated to the decision maker. Communication done through costlier channels is considered more effective at translating the high importance of the issue to the decision maker.

Finally, a theme discussed in the research was how the public can be motivated to participate in a grassroots lobbying campaign in the EU. The interviewees argued that the EU issues feel distant to the citizens, which make them less willing to participate in political grassroots campaigns. The interviewees and the literature review described a political issue suitable for grassroots lobbying as the kind of an issue that has a high and direct impact on consumer's everyday life and an issue that arouses very strong feeling in people. Based on the expert interviews there might be a lack of understanding and interest towards the EU politics in the EU. A company could increase the probability of people engaging to grassroots campaigns by presenting the political issues in more un-

derstandable way to the public and by informing the public about the impact these issues have to the everyday lives of the EU citizens. The figure below summarizes the managerial implications found in this study.

Managerial implications	Who to mobilise and the mobilisation channels are dependant on who the campaign is trying to influence.
	The special features of the EU environment, such as multiple cultures and languages should be taken into account when implementing a campaign.
	Identifying the institutions a company to target and the key decision-makers regarding the issue are the first steps of implementing a campaign.
	Besides the number of participants, a company should consider how to target the campaign to a certain decision maker.
	The cost and effect of a communication channel differs; using a costlier channel communicates a stronger concern on an issue.
	A company could increase the probability of people engaging to grassroots campaigns by presenting the issues in more clear and understandable way.

Figure 12 Managerial implications

6.3   Limitations of the research and suggestions for the further study

There are some limitations in this research that should be pointed out. One of the biggest challenges during the process of this study was to get an access to the relevant secondary data and academic publications. Because of the explorative nature of the study, there was not a lot of previous research on the topic. Moreover, most of the studies on grassroots lobbying had been implemented in the United States and therefore difficult to find. Nevertheless, the literature review provided a suitable amount of themes to build bases for the semi-structured interviews.

More empirical data could also have been gathered. The amount of collected data could have been larger, in order to get a deeper understanding and broader view on the research objectives. However, the main objective was not to generalize the concept of grassroots lobbying in the EU but to explore and deepen the relatively limited academic understanding of this concept. The amount of data gathered from the six expert interviews was adequate to be able to apply the propositions found from the literature review and make comparisons between the views of different interviewees. However, it is pos-

sible that from the empirical data point of view, some new aspects could have been found or further confirmed with more interviews. In addition, since the research did not concentrate on certain industry or on certain sized companies but the experts were evaluating the questions from the general corporation point of view, some of the results could have been different in a more specialized context.

The nature of this study was explorative and therefore it would be valuable to continue with additional studies in this field. Thus, there are several options for future research. First of all, it would be interesting to develop a deeper understanding of corporate grassroots lobbying in the EU by implementing a case study on a company running a grassroots lobbying campaign to influence the EU policy process. Secondly, some of the hypotheses formed in this study could be tested such as examining how does the long issue life cycle in the EU level influence the planning of the timing of a grassroots campaign. Furthermore, it would be interesting to examine grassroots lobbying tactic from the point of view of the participant, focusing on exploring what motivations drive people to engage into a grassroots campaign that is ran by a company.

7   SUMMARY

The European Union has gone through significant changes in the past 20 years. The fast growth of Internet, an increasingly well-educated public, the enlargements doubling the amount of member states and the treaties increasing the political powers of the EU have influenced the ways in which interest groups apply their political strategies in the EU. The importance of public opinion in politics has increased and the new technologies are empowering the wider public to express its opinions. Grassroots lobbying, the tactic of mobilizing the public to contact the decision makers on an issue that is in common interest to the mobiliser and the public, has become an interesting possibility for a company lobbying the EU institutions.

The purpose of this study has been *to explore how corporations use the tactic of grassroots lobbying in the European Union environment*. This topic was chosen for several reasons; Firstly, as the grassroots-lobbying tactic is seen as a new form of corporate political activity, it is important to deepen and strengthen the understanding of the concept. Furthermore, it was noted that existing literature had not sufficiently explored the phenomenon of grassroots lobbying in the EU environment, especially from the corporate perspective. Three sub-objectives were selected:

- To describe what kind of factors influence the selection of the grassroots-lobbying tactic at the European Union level.
- To describe how a company targets a grassroots lobbying campaign in the European Union environment.
- To map the key factors determining the shape of implementation of a grassroots lobbying campaign in the European Union environment.

In the beginning of the research the concept of the European Union policy environment is introduced as a nonmarket environment. It is found that in the EU decision making there is multi-layer structure, the decision making process is continuous and the issue life cycle long, the culture is casual and personal contacts matter. The theoretical part of the study firstly introduces corporate political strategies and theory on selecting timing for corporate political activity. Secondly, the theoretical part presents grassroots lobbying as a specific tactic. The conceptual differences between an ad hoc approach and broad-based approach to grassroots lobbying are presented. Furthermore, three different factors are found to influence the selection of the grassroots-lobbying tactic, which are issue characteristics, firm and industry characteristics and phase an issue is at in the issue's life cycle. Finally the previous research on the use of constituency strategy and its implementation in the EU is examined. It is proposed that in the EU the use of constituency strategy has not been broadly used because of multiple languages and cultures, lack of EU-wide media and democratic deficit.

The research objectives were addressed through qualitative research methods. Six expert interviews were conducted to find new perspectives and to deepen the understanding of the research objectives. After the interviews, the collected data was transcribed and analysed. The analysis started with coding, and the data was organized based on concepts and themes found from the literature review. Certain theoretical themes also arose naturally from the data. The data found from the different sources was compared with an aim to find similarities and irregularities. Subsequently, the empirical findings on grassroots lobbying in the EU were presented. The key empirical findings of the thesis are:

1. When company is selecting grassroots lobbying tactic, the familiarity of the tactic, organizational culture, financial resources and amount of stakeholders seem to have an impact to the selection.

2. The issues that are successfully lobbied through the grassroots-lobbying tactic were seen to be those, which have high and direct impact on lives of people, arouse strong feelings and are not very complex.

3. Contrary to the theoretical suggestion that lobbying should be always started as early as possible in the issue life cycle, in the EU a company should take into account the long policy process and limited capabilities to mobilise people when deciding on the timing of a campaign.

4. Targeting the object of the campaign and selecting the channels used in a grassroots-lobbying campaign are seen to be in function of identifying the key decision-makers on the issue. The decisions of who to mobilise and the mobilisation channels are considered to be dependant on who the campaign is trying to influence.

5. When the implementing a grassroots lobbying campaign in the EU environment, the special features such as multiple cultures and languages should be taken into account.

Overall this study was successful in giving more empirical material, which validates the previous academic studies and insights of the practitioners. The research also contributed insight into some nuances and alternative perspectives on the grassroots-lobbying tactic, both in the general sense, and in the EU-specific sense. Besides contributing to academic concepts of grassroots lobbying, this study also provided some novel practical insights to implementation of a grassroots lobbying campaign.

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APPENDIX 1. EUROPEAN UNION AS A NONMARKET ENVIRONMENT

There are several significant institutions in the European Union. From the point of view of corporate lobbying, these institutions can be narrowed down to three which are very important and influential in European policy making and have an active role in the policy-making process. These three institutions are the Council of the European Union, the European Commission and the European Parliament. (Joos 2011, 118.) In this chapter I will shortly introduce these three institutions and the simplified version of the EU decision-making process. The main characteristics of the EU decision making process are also introduced.

The European Commission is the only institution that has a right to make initiatives in the EU legislative process. Therefore the Commission has responsibility to make a first draft of the content and wording of directives and regulations at the EU level. Because of the right to initiate regulation, the Commission is the legislative agenda-setter of the EU. (Joos 2011, 118, Vaubel 2009, 26) After the Commission has generated drafts for new laws and policies, the Council of Ministers and the European Parliament can amend the Commission paper. The Council and the Parliament also take final decisions on if the regulation will be realized in the EU. After the decision is made, the European Commission is liable for supervising the implementation of the regulation which is implemented by the member states. (McCormick 2011, 78-84, Viinamäki 2007, 60) The Commission is responsible of overseeing the implementation of the laws and policies, acting as the conscience of the EU, managing of EU finances and the external relationships of EU with international organizations such as the United Nations and the World Trade Organization. (McCormick 2011, 78-84)

Proposals for the initiatives made by European commission can come from several different sources. For example a commissioner or a staff member of one of commissions departments can be behind a proposal. In addition, the proposal can be drafted due to the pressure applied by member-state governments, interest groups or the other European institutions. Even private companies or organizations representing an industry can propose initiatives and apply pressure towards the Commission to start the drafting process on an issue. (McCormick 2011, 78-84)

Ministers of the member state governments form the Council of the European Union. The Council makes final decisions on proposals of the Commission in conjunction with the Parliament. The members of the Council meet in one of the ten technical councils and the membership of these councils varies on the topic that is discussed. The Council represents interests of the member states. (McCormick 2011, 84-89) The Council of the European Union can be considered the important most decision making body of the EU. It has both legislative and central EU governmental and administrative power and in

addition to this it participates actively in all the legislative procedures. Many of the directives the Commission proposes are outcomes of propositions from the Council or the Member States. (Joos 2011, 118.)

European Parliament is the only EU institution that's members are directly elected by European voters. Therefore the Parliament represents citizens of the European Union and can be called the most democratic institution of the EU. (Joos 2011, 119, Viinamäki 2007, 45-46, McCormick 2011, 88-89) Different to conventional legislatures, the Parliament cannot initiate laws or raise revenues. Parliament amends and decides of Commission proposals together with the Council. (McCormick 2011, 88-89) Influence of the Parliament on legislation is nevertheless a lot more significant than it is usually assumed. Even though it does not have a right of initiative, it does have equal powers in most of the legislative procedures than the Council. The Parliament can postpone legislation or force the Commission to make remarkable concessions in the substance of its legislative initiative if it chooses. (Joos 2011, 119.)

Besides having multiple significant institutions, there are other noteworthy features in the EU policy-making environment. Structure, process, resources and culture can be used to categorize the key characteristics of the European policy-making arena. The most important structural characteristic of EU decision-making is the multi-level nature of it. The EU policy process continuously goes back and forward between national and supranational levels of decision-making.

Because of the multi-level nature of the EU decision-making, the private actors have to be active at different levels and in different institutions of public decision-making, typically even at the same time. There are also a broad variety of stakeholders and interested parties that the companies are faced with at these different levels. Another defining character of European policy-making arena is that the lobbyists have to stay involved with the issue during the long policy cycle, which can take a lot of resources. The access to the different European institutions is usually earned with exchanging resources, especially knowledge and expertise. Thus, the culture of EU decision-making is also characterized by casualness and mutuality. (Taminiau & Wilts 2006, 124-125)

The legislative procedure in the EU is very complex. This procedure can have a maximum of eight phases. These phases are: 1) Commission proposal 2) first reading in European Parliament 3) first reading in the Council 4) second reading in the parliament 5) Commission opinion 6) second reading in the Council 7) Conciliation committee 8) third reading in the Council and Parliament. (Joos 2011, 117.) The figure 2 in the next page illustrates the different phases of the legislative procedure in the EU.
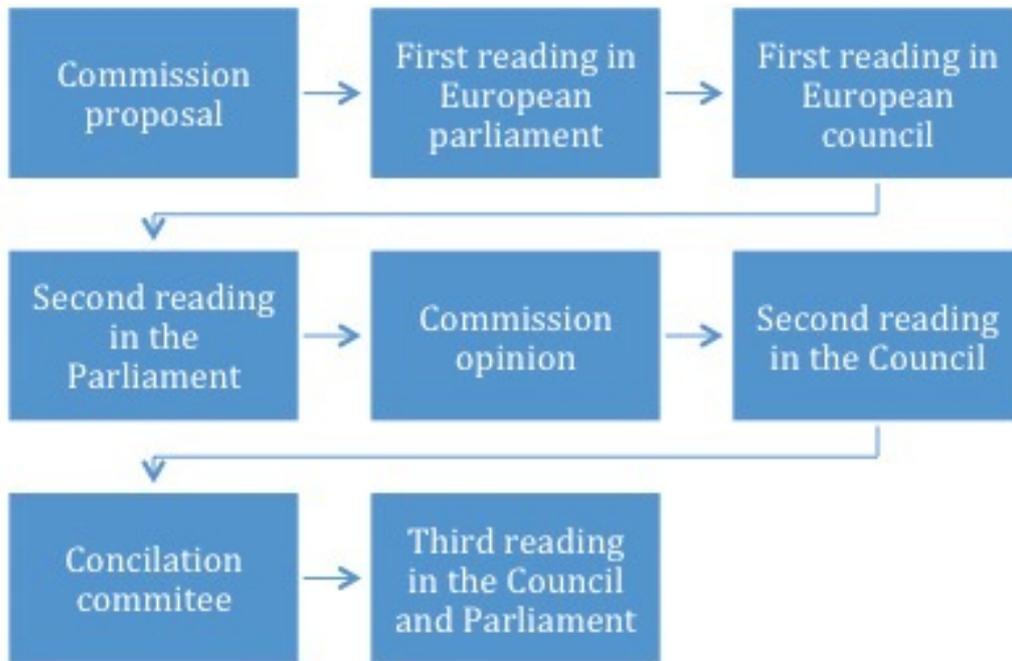
Figure 13 Phases of legislative procedure in the EU

APPENDIX 2. THE INTERVIEW OUTLINE

INTERVIEW THEMES

Background information

1. Can you tell a bit about your background in public affairs and advocacy?

Selecting grassroots

2. Can you describe how the use of grassroots campaign started in your company? What kinds of companies you think usually select the tactic of grassroots lobbying?

3. What kinds of political issues the company you worked for have used or is using the tactic of grassroots lobbying?

4. What was the aim of your grassroots campaign? What kinds of aims can there be for grassroots lobbying?

5. How have you implemented your grassroots campaign? What kinds of different ways there are to implement a grassroots campaign?

Implementing grassroots lobbying tactic

6. Describe the planning process of your grassroots campaign?
   - How was the target decision-maker selected?
   - How was the target audience selected?
   - Timing?

Grassroots in the EU

7. What should you take into account when using the grassroots-lobbying tactic in the EU environment?

Do you have anything you would like to add? Can I contact you with follow-up questions if there are some?