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ABSTRACT Framing plays an important role in public policy. Interest groups strategically highlight some aspects of a policy proposal while ignoring others in order to gain an advantage in the policy debate. However, we know remarkably little about how interest groups choose their frames. This contribution therefore studies the determinants of frame choice during the policy formulation stage in the European Union. We argue that frame choice is a complex process which is simultaneously affected by interest groups as well as contextual characteristics. With regard to interest group characteristics, we expect that frame choice varies systematically across actor type. With regard to contextual characteristics, we hypothesize that the frames that interest groups employ are specifically tailored towards the DGs in charge of drafting the proposal. Our theoretical expectations are tested based on a new and innovative dataset on frame choice of more than 3,000 interest groups in 44 policy debates.

KEY WORDS Directorates General; European Commission; European Union; framing; interest groups; lobbying; quantitative text analysis.

1. INTRODUCTION

Why does frame selection vary across interest groups and across policy debates? The way interest groups frame a debate can have a significant impact on the outcome of a legislative debate. Policy proposals often have a differential effect on various segments of society. Some groups benefit from a policy reform while others are confronted with losses. In addition, legislative proposals are often quite complex, involving a multitude of policy issues that are regulated by one single legislative initiative. As a result, different societal interests might be concerned about different elements of a proposal. Interest groups can strategically highlight some aspects of a proposal while ignoring others to push the legislative debate in a favourable direction (Baumgartner and Mahoney 2008).

Baumgartner *et al.* (2008) importantly show the power of framing in their analysis of the death penalty policy in the United States (US). The long-dominant morality frame has been replaced by an innocence frame highlighting the errors in the criminal justice system. The authors convincingly demonstrate that the reframing of the issue put forward by advocates opposing the death

penalty has led to an important change of public opinion which ultimately resulted in a major public policy change towards the death penalty. Similar framing dynamics are also at play in the European Union (EU). Ringe (2005) demonstrates that political actors involved in an EU policy debate on cross-border takeover bids could successfully change the terms of the debate and ultimately affect the legislative outcome by strategically framing the proposal. Ringe (2009) extends this analysis to a broader set of cases and finds similar framing dynamics. Daviter (2011) shows that framing not only structures political conflict in the EU, but also importantly affects legislative outcomes. Hence, in order to better understand how policy-making in the European Union works, it is crucial to systematically study framing and its impact on policy outcomes. As a result, it is important to better understand interest groups' frame choice as their framing strategy can have a decisive effect on public policy in the European Union and beyond.

Framing therefore constitutes an important lobbying strategy for interest groups. When policy-makers launch a legislative initiative that affects the policy concerns of interest groups, they have an incentive to shape the outcome of the policy debate in their favour. The way interest groups frame a debate has an impact on the policy options that are considered by decision-makers and on the final outcome of a legislative debate (Baumgartner *et al.* 2009; Mahoney and Baumgartner 2008). Interest groups therefore often strategically highlight some aspects of policy proposals while ignoring others to shape policy debates in their favour. Further, framing is sometimes one of the only tools available to resource-poor interest groups. Many citizen groups that do not have massive lobbying budgets often have only their argumentation to rely upon.

The way interest groups frame a policy debate, however, varies. Interest group characteristics can constrain the types of frames that are plausibly available for an organized interest to deploy. Shell Oil, for example, may not deploy an environmental frame, as it may be seen as insincere. Similarly, Occupy Movement advocates are unlikely to employ pro-business frames. However, the extent to which groups are constrained in their frame choice is an open question, one for which we have, until now, had insufficient data to answer. Furthermore, characteristics of the institutional context may also affect framing choices (see also Klüver *et al.* [2015]). Mahoney (2008) has previously explored how interest groups used framing strategies to achieve their policy objectives regarding a selected set of EU legislative proposals. She found that about one-third of all interest groups she interviewed strategically adapted their frame choice depending on the context of an EU policy debate. On the face of it, this makes perfect sense; if you are lobbying DG Environment, it would be reasonable to focus on environmental aspects of the debate and then shift to emphasizing economic aspects when lobbying DG Enterprise. However, while that would seem quite obvious to most political observers, the majority of advocates, two-thirds, indicated that they generally stick to the same framing strategy when lobbying the European institutions. So why do some interest groups change the frame type

they employ across different policy debates while other groups always use the same frame? In this study, we aim to solve this puzzle by arguing that frame choice can be explained by the interplay between interest group and contextual characteristics.

Before we present our own arguments in more detail, it is necessary to clearly define what we mean by framing as the literature is characterized by conceptual ambiguity. However, central to any conceptualization of framing is that the manner in which certain aspects of reality are expressed has the potential to affect the decision of an actor choosing from a set of possible actions. Druckman (2004) and Chong and Druckman (2007) identify two types of frames: equivalency (or valence) frames and issue (or emphasis) frames. One speaks of equivalency frames when 'different, but *logically equivalent*, phrases cause individuals to alter their preferences' which typically involves 'casting the same information in either a positive or negative light' (Chong and Druckman 2007: 114; emphasis original). 'Issue framing effects,' Druckman (2004: 672) writes, 'refer to situations where, by emphasizing a subset of potentially relevant considerations, a speaker leads individuals to focus on these considerations when constructing their opinions.' In describing the latter, Entman (1991: 53) has described frames as 'selecting and highlighting some features of reality while omitting others'. We follow Entman (1991) and define a *frame* accordingly as a specific issue of a policy proposal that is emphasized in a policy debate. Policy proposals typically contain a number of policy issues about which interest groups may have opposing views. For instance, a policy proposal on CO₂ emissions from cars recently analysed by Klüver (2009) contained 20 different issues which were debated between stakeholders and policy-makers. Hence, by employing a specific frame, interest groups only highlight one single issue or a subset of advantageous issues that are covered by a proposal, while downplaying less favourable issues. A policy issue is understood as an element of a policy proposal on which interest groups take a position. By contrast, a policy proposal refers to a legislative proposal prepared by the European Commission. A policy or legislative debate describes the process of preparing and adopting a legislative proposal in which both the EU institutions and societal actors discuss the content of the proposal.¹ Frame choice is therefore by default a strategic decision, as interest groups deliberately highlight a favourable aspect of a policy proposal to gain advantages in a policy debate.

Despite the importance of interest group framing for policy outcomes, we know remarkably little about how interest groups choose frames in policy debates. In this study, we therefore seek to understand the determinants of interest group frame choice during the policy formulation stage when the European Commission drafts its legislative proposals. We argue that frame choice is a complex process which is simultaneously affected by both interest group and contextual characteristics (Baumgartner and Leech 1998; Klüver *et al.* 2015). With regard to interest group characteristics, we expect that frame choice varies systematically across actor type. With regard to contextual characteristics, we hypothesize that frame choice is affected by institutional properties of the

European Commission (see also Klüver *et al.* [2015]). More specifically, we argue that the frames that interest groups employ are specifically tailored towards the DGs in charge of drafting the proposal. Our theoretical expectations are tested based on a new and innovative dataset on frame choice of more than 3,000 interest groups in 44 policy debates. The contribution of this study is twofold: first, we present the first study that systematically studies the determinants of interest group frame choice in EU policy-making; second, this is, to our knowledge, the most comprehensive large-N study of interest group framing in the European Union that introduces a novel dataset which maps interest group framing during the policy formulation stage.

2. FRAMING BETWEEN THE LOGIC OF MEMBERSHIP AND THE LOGIC OF INFLUENCE

We posit that frame choice of interest groups can be explained by taking into account the environment in which interest groups lobby decision-makers. We assume that interest groups have to respond to two different logics: the logic of membership and the logic of influence (Schmitter and Streeck 1999). Both logics simultaneously affect the behaviour of interest groups more generally and the frame selection of interest groups more specifically. The *logic of membership* requires from interest groups that they behave in accordance with their constituency structure to ensure a constant flow of resources. The *logic of influence* demands from interest groups that they choose frames that allow them to exercise influence over decision-makers and policy-making outcomes. We expect that variation in frame choice is a joint function of the logics of membership and influence, mediated by the type of interest group and the institutional context (see also Klüver *et al.* [2015]).

The basic interest of interest groups is survival (Lowery 2007). In order to understand how the basic survival interest is linked to frame choice, it is important to distinguish different types of interest groups. Interest groups can be distinguished according to two different criteria: organizational form and nature of the interest. With regard to organizational form, one can first distinguish between associations and firms. Whereas associations are membership organizations that have individuals, companies, public institutions or other associations as members, firms are corporate actors that do not have any members. Associations and firms therefore have different internal structures and different functions, so that the pathway to survival is different. The primary function of associations is to represent their members before government. Since members are their main resource providers, associations are competing for members to extract from them adequate resources to ensure their survival (McCarthy and Zald 1977; Schmitter and Streeck 1999).

Individual or collective members delegate the representation of their interests to associations which lobby decision-makers with the goal of realizing their political interests. Members therefore expect associations to influence legislators so that final policy outcomes are as close as possible to members' own policy

preferences. The satisfaction of these demands is important for keeping a large member base, ensuring a constant flow of financial resources through member contributions and, ultimately, the survival of the association. It is for this reason that associations seek to maximize their influence on the political decision-making process. Firms are, by contrast, non-membership organizations whose survival depends on their profitability and on the market rather than the satisfaction of members. Firms can therefore lobby decision-makers to produce policy outcomes without being constrained by the logic of membership.

Associations can be further disaggregated into 'sectional groups' and 'cause groups' based on the nature of the interest they represent (Stewart 1958). Sectional groups represent a section of society such as farmers or chemical corporations. Sectional groups represent special economic interests that create concentrated costs and benefits for their supporters. Their task is to look after the specific interest of this particular section of society, and their membership is usually limited to that section. These groups typically find it very easy to organize and extract resources from their members, as the group represents its members' primary material interests. Cause groups, by contrast, typically fight for a public good such as environmental protection, health or consumer protection. The membership of cause groups is not restricted; anyone in favour of the principle can become a member of the group. Cause groups represent diffuse, public interests that impose diffuse costs on and benefits to their supporters. The interests that cause groups fight for are not related to the material needs of a small, homogeneous group of citizens, but rather to a large, heterogeneous group of individuals. The diffuse costs and benefits associated with this form of organization makes it difficult to organize and extract valuable resources from their members.

In order to compensate for their structural weaknesses, cause groups use lobbying strategies as a means to attract new members and supporters. As (potential) supporters of cause groups value certain public goods, cause groups need to express the values and views they pursue publicly. Cause groups raise awareness among potential supporters and attract new members by increasing the visibility of the organization's policy goals such as environmental protection or human rights. Several scholars have shown that cause groups use extensive outside lobbying strategies such as demonstrations or protests to increase the visibility of their policy claims in the general public (e.g., Beyers 2004; Kollman 1998). Accordingly, we expect the frame choice of cause groups to be linked to the structure of their constituency. Potential supporters of cause groups only face diffuse costs and benefits and are typically less well-endowed with resources and also less inclined to invest these resources for the pursuit of the diffuse policy goal than supporters of sectional groups. As cause groups constantly suffer from collective action problems to gain new members and ensure the flow of resources, their frame choice will reflect the public goods for which cause groups are fighting. Since cause groups typically fight for public goods such as environmental protection or human rights, we expect that cause

groups are prone to use public frames emphasizing, e.g., the implications of a proposal for the environment or human rights.

By contrast, we expect that sectional groups have more flexibility when deciding about the most effective frame to influence public policy. Sectional groups do not suffer from the same collective action problems as cause groups, since they represent the economic interests of a clearly circumscribed segment of society so that concentrated costs and benefits are involved, which makes mobilization a lot easier. Hence, while sectional groups have a tendency to employ economic frames linked to their constituents' interests, they have more flexibility to draw on a broader set of frames. Finally, we expect that firms have the greatest flexibility with regard to frame choice, as they are not at all constrained by any members. Accordingly, we argue that the frame choice of cause groups is most strongly constrained by the logic of membership, which leads them to primarily rely on public frames that reflect the focus of their members on public goods such as environmental protection or human rights. Sectional groups, by contrast, tend to rely on economic frames related to the interests of their constituents, but they enjoy more flexibility to employ a broader set of frames. In comparison, firms show the greatest diversity of frames, since they are not at all constrained by any members.

H1: The type of frame chosen by interest groups is affected by interest group type. Cause groups primarily rely on public frames, while sectional groups tend to rely on economic frames, whereas firms show the greatest diversity of frames, since they are not constrained by any members.

Moreover, we expect that the frame choice of interest groups is affected by the logic of influence. The logic of influence requires that interest groups adopt framing strategies that enable them to influence decision-makers. To maximize their influence on policy-making, interest groups need to take into account the features of the institutional access points (see also Klüver *et al.* [2015]). All policy proposals in the European Union originate in the European Commission, meaning that the latter enjoys a monopoly on legislative initiative, making it the gate-keeper to the policy-making process. It is therefore important for interest groups to adapt their framing strategy to the institutional structure of the European Commission (see also Bernhagen *et al.* [2015]; Beyers *et al.* [2015]).

Directorates General (DGs), which are organized by policy sector, prepare legislative proposals. For each proposal, a primarily responsible DG is assigned, which takes the lead in drafting the legislative proposal. The lead DG co-ordinates with other relevant DGs, and typically consults expert groups, advisory committees and stakeholders in the drafting process. Despite this widespread consultation, previous research has shown that the lead DG enjoys significant power in shaping the content of the final legislative proposal (Hartlapp *et al.* 2013). Moreover, it is important for explaining frame choice by interest groups that Commission DGs have very different interests and beliefs as a result of their competence and administrative culture Hartlapp *et al.* 2013;

(Hooghe 2001). For instance, the more liberal DG Competition has often been in conflict with the more interventionist DG Industrial policy (Morth 2000: 176). Similarly, the more protectionist DG Agriculture often opposes the more liberal DG Trade (Dür and Zimmermann 2007: 774). It is therefore important for interest groups to tailor their framing strategy with regard to the particular preferences and beliefs of the responsible lead DG (see also Mahoney [2008]; Mahoney and Baumgartner [2008]). We therefore expect that the frames employed by interest groups systematically vary across policy debates depending on which DG is in charge of drafting the proposal of the European Commission.²

H2: Interest group frame choice varies systematically across different DGs, as interest groups adjust their frame according to the institutional profile of the lead DG which drafts the legislative proposal.

3. RESEARCH DESIGN

3.1. Data selection

In order to test the effect of institutional factors and interest group type on interest group framing while being able to control for policy-related contextual factors, we have constructed a novel dataset on interest group framing across 44 policy debates. The unit of analysis is the frame choice of an interest group in a specific policy debate. We selected the policy debates based on three selection criteria. First, in terms of time period, we selected policy proposals that were adopted by the European Commission between 1 January 2008 and 31 December 2010 to be able to obtain position papers from interest groups and to allow for these proposals to pass the entire legislative process before the analysis was completed. Second, in order to control for the impact of policy proposals, we only focused on proposals for directives and regulations which are the only binding legislative acts that are generally applicable. In addition, we included green and white papers that resulted in directives or regulations in our sample in order to cover proposals at different stages of the formal policy agenda.

Third, we only selected policy proposals for which the European Commission has carried out a non-standardized publicly available online consultation. On the basis of a preliminary draft proposal which sets out the envisaged legislative initiative, the European Commission launches a public consultation, which allows interest groups to submit comments expressing their views on the proposed initiative. Using consultations as a selection criterion offers two advantages. First, as the Communication on Minimum Standards on Consultations states, the European Commission only consults on ‘major’ policy initiatives which have a substantial economic, environmental or social impact on society (European Commission 2002: 15). By drawing solely on policy proposals for which the Commission has conducted a consultation, we can therefore focus

on politically important policy debates that raised a minimum amount of attention and controversy. The second major advantage of only choosing policy proposals which have been preceded by public consultations is the availability of textual data for the measurement of interest group framing.

Using the EU PreLex database, we identified 44 policy proposals that meet the above-mentioned selection criteria. Table A.1 in the Online Appendix illustrates the distribution of these proposals across policy areas.⁵ The sample includes 34 proposals for directives and regulations and 10 green and white papers. In 44 consultations analysed, a total of 3,774 interest groups participated, which constitutes the interest group sample we are exploring in this study. It has to be noted, however, that we could only analyse English submissions, as quantitative text analysis only works in one language, so we had to exclude 673 submissions from the analysis.

3.2. Measuring interest group frames

In this study, we rely on a novel approach to measure interest group framing which employs quantitative text analysis to capture political rhetoric on the basis of interest group submissions to online consultations held by the European Commission (Boräng *et al.* 2014; Klüver and Mahoney 2015). This new methodological approach allows for studying interest group framing across a large number of policy debates and interest groups, so that we are able to test the hypothesized contextual effects on interest group framing.

The quantitative text analysis technique developed by Klüver and Mahoney (2015) uses a cluster analysis to identify the frames employed by interest groups. Identifying frames by running a cluster analysis on interest group position papers is based on the idea that words that co-occur 'in similar contexts tend to have similar meaning' and 'documents that contain similar word patterns tend to have similar topics'. For instance, interest groups that use an environmental frame in a policy debate will use words such as 'nature', 'pollution' or 'warming' to emphasize the impact of a legislative proposal on the environment. By contrast, interest groups that employ an economic frame would use words such as 'productivity', 'jobs' and 'growth' to point out the implications of a proposed legislative initiative on the economy.

We use the software package T-LAB to carry out the cluster analysis (Lancia 2009, 2012). The interest group documents are converted into a term-document-matrix that contains documents in rows and the occurrence of words in each text in columns. Based on a bisecting K-means clustering algorithm, T-LAB identifies clusters of documents that use a similar vocabulary (for further information, see Steinbach *et al.* [2000]). Given that interest groups need to rely on similar words to make the same argument, for instance using words such as 'warming', 'climate' and 'pollution' to highlight the impact of a legislative initiative on climate change, these clusters can be interpreted as frames (Bailey and Schonhardt-Bailey 2008; Schonhardt-Bailey 2008).

In order to conduct the quantitative text analysis, several preparatory steps are required. First, we converted all documents into plain text files. Second, in order to identify the frames employed by interest groups, all text passages not directly referring to the interest groups' views on the policy debates had to be removed from the documents. For instance, we have eliminated contact details and self-descriptions of interest groups, as well as repetitions of consultation questions posed by the European Commission. Third, as the cluster analysis relies on individual words to identify frames, it is essential that words are spelled consistently across documents, and we have therefore corrected spelling errors in the interest group submissions.

In order to test the validity of the quantitative text analysis, we have performed two validity checks. First, we have conducted a case study of two policy debates in the European Union about the reduction of CO₂ emissions from cars and rail passenger rights. We have compared our results obtained by employing the T-LAB analysis with a manually coded content analysis and showed that both techniques essentially arrive at the same results (Klüver and Mahoney 2015). Second, on the basis of another policy debate concerning the Commission proposal for a Directive on Waste Electrical and Electronic Equipment, we have compared the results of our framing analysis to a qualitative hand-coding analysis and expert interviews with Commission officials and interest groups analysed by two related research projects (Boräng *et al.* 2014). All three techniques arrived at a similar set of frames, therefore corroborating the validity of our text analysis technique.

On the basis of the frames identified by T-LAB, human coders allocated the frames along thematic lines following a coding scheme developed by Mahoney (2008). Overall, we distinguish nine different thematic frames: economic frames; environmental frames; crime and security frames; human rights frames; public health frames; integration frames; research and development frames; consumer protection frames; and technical or legal frames. The coding of the frames is based on important key words that discriminate between different frames identified by the quantitative text analysis, as well as on careful reading of a random subset of interest group submissions. More specifically, we have randomly selected 10 documents from each cluster (or frame) and human coders carefully read these documents to code the frames employed by interest groups into the nine thematic categories.

In order to test whether frame choice varies systematically across interest group type as posited by hypothesis 1, we grouped these identified frames into three broad categories that directly correspond to the nature of the constituency interests of cause groups and sectional groups: *public frames*, *economic frames*, and *other frames*. We consider environmental frames, human rights frames, consumer protection frames and public health frames to be typical public frames emphasizing the implications of a policy proposal for public goods, while economic frames highlight the impact of a legislative initiative on economic performance. We expect that public frames are typically used by cause groups, while economic frames should be typically used by sectional

groups and firms. By contrast, crime and security, integration, research and technical/legal frames are not clearly associated with any interest group type and are therefore grouped into an ‘others’ category.

3.3. Operationalization of independent variables

Interest group type was coded based on information that we retrieved from interest group submissions and interest group websites. More precisely, we distinguished between cause groups, sectional groups and firms based on the configuration, the organizational structure and the policy goals of interest groups. In order to test whether interest groups tailor their framing strategy in accordance with the primarily responsible DG, we have grouped *lead DGs* into three different categories on the basis of previous literature and expert judgment (see also Bernhagen *et al.* [2015]; Beyers *et al.* [2015]): receptive to public frames; receptive to economic frames; and not systematically more or less receptive to specific frames (see also Table 2). More specifically, we consider DG Health and Consumers, DG Environment, DG Justice and DG Development to be receptive to public frames. DG Enterprise and Industry, DG Internal Market, DG Agriculture, DG Competition and DG Trade are coded as being receptive to economic frames. The remaining DGs are considered not to be receptive to any particular frame type. The lead DGs have been identified using the PreLex legislative database of the European Commission. For all proposals analysed in this study, one single lead DG was assigned by the European Commission.

In order to test the formulated hypotheses, we control for possible confounding variables identified in the literature (Klüver 2013; Mahoney 2008). We measure the *salience* of a policy debate among interest groups drawing on the number of actors that participated in the European Commission consultations. The *scope* of policy initiatives is operationalized by the number of words that the policy paper proposing the policy initiative (e.g., green or white paper) contains. The underlying assumption for using this indicator is that the number of words should increase with the scope of a policy initiative.⁴ In order to measure the *diversity of interest groups* involved in a policy debate, we use the Herfindahl index. We have classified the interest groups that participated in the selected consultations into seven actor type categories to allow for a more fine-grained distinction to better capture the diversity among mobilized interest groups (cause groups, business groups, trade unions, public groups, firms, professional associations and other interest groups). This classification allows in particular for a more fine-grained distinction of different types of sectional groups as often advocated for in the interest group literature (see e.g., Baroni *et al.* 2014). The interest group classification into actor type categories was based on information obtained about the interest groups in their consultation submissions and from their websites. The Herfindahl index is computed by summing the squared proportions of the nominally measured actor type variable across the values of the variable. To ease interpretation, we have rescaled the

index by calculating $100 * (1 - (1/\text{number of categories}))$ so that values close to zero indicate a low degree of interest group diversity while values close to 100 indicate high interest group diversity.

4. DATA ANALYSIS

Table 1 illustrates that frame choice varies systematically across interest group type, suggesting that the logic of membership considerably affects frame choice. Cause groups make considerably more use of environmental and human rights frames than sectional groups or firms. By contrast, consumer frames are only used slightly more often by cause groups. Sectional groups use economic frames considerably more frequently than cause groups. Firms use public frames significantly less than cause groups, but at the same time they also use economic frames much more rarely than sectional groups. With regard to frames that are not clearly associated with a particular interest group type, there is hardly any systematic variation across interest group type except for integration frames, which are used considerably more by sectional groups and firms than by cause groups.

Table 2 shows how frame choice varies across different lead DGs. Table 2 demonstrates that public frames are employed by interest groups considerably more if the proposal in question is drafted by DG Environment, DG Justice or DG Health and Consumer protection. Similarly, Table 2 indicates that interest groups frequently use economic frames if a legislative proposal is prepared by DG Trade, by DG Internal Market and Services, by DG Competition or by DG Agriculture. Hence, frame choice systematically varies with

Table 1 Frame choice by interest group type (per cent)

Frame type	Cause groups (N = 612)	Sectional groups (N = 1,859)	Firms (N = 630)
<i>Public frame</i>			
Environment	6.86	1.99	2.22
Human rights	12.42	0.43	0.00
Consumers	9.48	8.88	7.14
<i>Economic frame</i>			
Economic	17.32	23.29	13.02
<i>No clear frame match</i>			
Crime & Security	0.65	1.56	0.79
Public health	4.74	6.19	7.94
Integration	4.74	14.85	19.37
Research	3.27	5.11	1.27
Technical & Legal	40.52	37.71	48.25
<i>Total</i>	100.00	100.00	100.00

Note: Cramer's V = 0.26, N = 3,101.

Table 2 Frame choice by lead Directorate General (per cent)

	<i>Receptive to public frame</i>				<i>Receptive to economic frame</i>					<i>Not receptive to particular frame</i>					
	<i>Health and Consumers</i> (N = 281)	<i>Environ-ment</i> (N = 193)	<i>Justice</i> (N = 285)	<i>Develop-ment</i> (N = 116)	<i>Enterprise and Industry</i> (N = 331)	<i>Internal Market</i> (N = 1.106)	<i>Agriculture</i> (N = 52)	<i>Competition</i> (N = 20)	<i>Trade</i> (N = 92)	<i>Energy and Transport</i> (N = 233)	<i>Research</i> (N = 45)	<i>Employment</i> (N = 176)	<i>Trade</i> (N = 92)	<i>Budget</i> (N = 108)	<i>Secretariat</i> (N = 61)
Public frame															
Environment	0.00	13.47	0.00	0.00	4.80	0.00	42.31	0.00	0.00	12.45	0.00	0.00	0.00	0.00	0.00
Human rights	0.00	0.00	29.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Consumers	42.70	0.00	10.53	0.00	11.71	6.42	0.00	0.00	0.00	3.43	0.00	0.00	0.00	0.00	0.00
Economic frame															
Economic	0.00	0.00	4.56	100.00	7.51	21.16	25.00	100.00	82.61	38.20	48.89	0.00	82.61	12.04	0.00
Other frames															
Security	0.00	0.00	4.21	0.00	0.00	1.99	0.00	0.00	0.00	1.72	0.00	0.00	0.00	0.00	0.00
Public health	25.27	0.00	0.00	0.00	31.53	0.00	0.00	0.00	0.00	7.73	0.00	0.00	0.00	0.00	0.00
Integration	0.00	37.82	8.42	0.00	3.00	21.70	0.00	0.00	0.00	5.15	0.00	38.64	0.00	0.00	0.00
Research	0.00	0.00	0.00	0.00	0.00	9.04	0.00	0.00	0.00	0.00	51.11	0.00	0.00	0.00	0.00
Technical and Legal	32.03	48.70	42.81	0.00	41.44	39.69	32.69	0.00	17.39	31.33	0.00	61.36	17.39	87.96	100.00
Total	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00

Note: Cramer's V: 0.42, N = 3,101.

lead DG responsibility, suggesting that the logic of influence constrains the frame choice of interest groups. Lobbyists indeed tailor their framing strategy in accordance with the characteristics of the lead DG. Our descriptive findings regarding the importance of DG responsibility are nicely in line with the results of Beyers *et al.* (2015) and Bernhagen *et al.* (2015), who show in other contributions to this collection that DG responsibility is important for interest group and party group alignment, as well as for the lobbying success of interest groups in the EU. Moreover, both Table 1 and Table 2 show that interest groups use technical and legal frames extensively, and that with regard to these frames there is little variation across interest group type or lead DG. Thus, a large number of policy debates in the EU revolve primarily around technical and legal questions.

While the descriptive illustrations provide a first idea about how frame choice varies with interest group type and lead DG, it is necessary to control for potential confounding factors that might affect the hypothesized relationships. In a second step, we have therefore estimated multivariate regression models to predict the frame choice of interest groups. We estimate two different models explaining (a) the use of a public frame and (b) the use of an economic frame in which the two dependent variables are binary (choice of public/economic frame: yes or no).⁵ As interest groups lobby the European institutions with regard to particular policy proposals, our dataset is hierarchically clustered. Ignoring the clustering of the data may result in deflated standard errors and inflated type I error rates so that predictors seem to have a significant effect even though they do not (Steenbergen and Jones 2002: 219–20). We therefore draw on multi-level modelling to analyse the data by distinguishing between the interest group (first) level and the policy proposal (second) level. As our two dependent variables are binary, we estimate multi-level logistic regression models.

Table 3 presents the results of the multi-level logistic regression. The dependent variable in the first model describes whether interest groups use a public frame, while the dependent variable in the second model is a binary variable indicating whether interest groups use an economic frame. The first model shows that both interest group type as well as lead DG have a statistically significant effect on whether interest groups use a public frame. Sectional groups and firms are significantly less likely to make use of a public frame highlighting the impact of a proposal for the environment, for human rights, for consumers or for the development of countries than cause groups. The chance for using a public frame is 66 per cent smaller for sectional groups and 68 per cent smaller for firms as compared to cause groups. Thus, in line with our theoretical expectation that the logic of membership affects frame choice, cause groups are significantly more likely to employ frames that are related to the public interests of their constituency. However, at the same time frame choice is constrained by the logic of influence: if the policy proposal falls under the remit of a DG that is receptive to public frames (DG Environment, DG Health and Consumer Protection, DG Justice or DG Development), interest groups are

Table 3 Results from multilevel logistic regression

	<i>Public frame</i>	<i>Economic frame</i>
Fixed effects		
Type: Sectional group	0.337*** (0.067)	2.277*** (0.533)
Type: Firm	0.320*** (0.083)	1.267 (0.353)
Receptive DG	37.633** (69.709)	12.343 (29.738)
Salience	0.965** (0.016)	0.970 (0.021)
Scope	1.000 (0.000)	1.000 (0.000)
Diversity	1.139 (0.095)	1.052 (0.113)
Constant	0.000 (0.001)	0.001 (0.007)
Random effects		
Proposal-level variance	21.421 (7.886)	42.462 (31.832)
Model fit		
N / Policy debates	3,101 / 44	3,101 / 44
AIC	1404	1274
BIC	1452	1323

Notes: *** $p \leq 0.01$, ** $p \leq 0.05$, * $p \leq 0.10$; coefficients represent odds ratios; standard errors in parentheses; reference category for sectional groups and firms are cause groups; reference category for receptive DG are non-receptive DGs and DGs not receptive to any particular frame.

significantly more likely to employ a public frame when lobbying the European Commission. More specifically, if DG Environment, DG Health and Consumer Protection, DG Justice or DG Development are responsible for drafting the Commission proposal, it is 38 times more likely that interest groups choose a public frame.

The second regression model shows that interest group type also matters for the choice of an economic frame. Sectional groups are considerably more likely to use an economic frame than cause groups or firms. On average, sectional groups are two times more likely to employ an economic frame than cause groups. However, there is no statistically significant difference between cause groups and firms, which suggests that firms are much more flexible than sectional groups in the choice of the frames they employ to lobby the European Commission. In contrast to public frame choice, economic frame choice is not systematically affected by the lead DG drafting the proposal.

5. CONCLUSION

Framing can play an important role in public policy. Interest groups use political rhetoric to shape a legislative debate in their favour. They strategically highlight some aspects of a proposal while neglecting others in order to direct collective attention to their preferred policy option. Despite the important role of framing for public policies, we have remarkably little knowledge about interest group framing. In this contribution, we have attempted to overcome this shortcoming of the literature by shedding light on the determinants of frame choice during the policy formulation stage when the European Commission drafts its policy proposals.

Based on a novel dataset on framing strategies of more than 3,000 interest groups in 44 EU policy debates, we have shown that frame choice systematically varies across interest group type and institutional venues. Cause groups are significantly more likely to use public frames highlighting the impact of a proposal for the environment, human rights and consumer protection than sectional groups and firms. By contrast, sectional groups are considerably more likely to employ economic frames than cause groups when trying to influence the European Commission, while there is no significant difference between the use of economic frames between cause groups and firms. Hence, membership organizations are typically constrained by the policy interests of their members, but these constraints are stronger for cause groups than for sectional groups. Firms, however, are not dependent on members and their resources and can therefore more flexibly choose their framing strategy. Rather than only selling their point from an economic standpoint, they can also justify their positions using another thematic frame. With regard to the logic of influence, the evidence is mixed. While interest groups choose a public frame much more often if DG Environment, DG Justice, DG Environment or DG Development are in charge of preparing the draft, we could not find any systematic relationship between DG type and economic frames. Future research should therefore shed further light on how institutional characteristics interact with framing strategies.

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SUPPLEMENTAL DATA AND RESEARCH MATERIALS

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NOTES

- 1 In this contribution, we use the terms ‘policy proposal’ and ‘legislative proposal’ interchangeably. Similarly, the terms ‘policy debate’ and ‘legislative debates’ are equally used interchangeably.
- 2 As we outline in the research design section, we distinguish DGs according to their receptiveness to different types of frames. Building on hypothesis 2 and the DG classification, we expect that interest groups will deploy relatively more public frames when submitting documents to DG Health and Consumers, DG Environment, DG Justice and DG Development, while interest groups will deploy relatively more economic frames when submitting documents to DG Enterprise and Industry, DG Internal Market, DG Agriculture, DG Competition and DG Trade.
- 3 About 36 per cent of the policy proposals fall into the policy area ‘Banking, finance and domestic commerce’ which may be a direct result of the banking and subsequent economic crisis which hit the EU during the time period analysed in this study. Given that the resulting sample of interest groups that we analyse largely corresponds to the overall composition of interest groups in the EU, we are confident that our findings are not systematically biased (Wonka *et al.* 2010).
- 4 In an alternative model specification, we have measured the scope using the number of articles included in a proposal. Our major findings remain constant.
- 5 Alternatively, one may also specify a multi-level multinomial regression model in which the dependent variable distinguishes between the different frames employed by interest groups. However, it is not (yet) possible to estimate such a model with standard statistical packages such as STATA or R.

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