

Strategy for lobbying in the European Union

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1. CURRENT POSITION:

1.1. Healthy Europe Company

Healthy Europe Company (HE) was established 1993. HE's Office is in Brussels because being in Brussels gives an advantage (Mahoney, 2004, p453). It's really valued in health issue lobbying, both clients and EU politicians. Now it is leading lobbying firm on the health issues in the EU and it is often consulted, invited to workshops etc. by EU. All the work with EU politicians has give privilege position and access. That is the reward what EU can give. (Broscheid and Coen, 2007 p350)

1.2. The National Heart Alliance

The National Heart Alliance (NHA) has very firm position in the UK because it has 40 organizations in it, but this is also a problem because all of these organizations have a little different values so it is important to have only one voice to outside of these organizations. NHA have got more concerned with 'trans fats' which increases LDL cholesterol and lowers HDL cholesterol. This can lead to many different diseases. NHA thinks that this matter is so important that UK-level legislation isn't enough so they hired Healthy Europe to take this issue to EU. This is first time that NHA is trying to influence on EU level.

2. LOBBYING

2.1. Elements of lobbying

EU style of lobbying is subtle, constructive and consensus-oriented so lobbyist must talk really softly (Woll, 2006, p461–462). For more effective lobbying, lobbyist should concentrate agreeing politicians, because they can get your point of view on the wall, e.g. draft a bill, and write him/her a speech (Detzer, 1948, cited in McGrath, 2005 p63). Client should be number one spoke person, so lobbyist main job is work behind the scene (McGrath, 2005).

McGrath (2005, p51) has said, for lobbying in Brussels lobbyist must handle four elements: research, monitoring, political communication and lobbying. Presenting two-sided information is more effective because then there won't be any big surprises and it gives more respects among politicians. Because HE is concentrated on Health issue lobbying, HE is constantly monitoring that field. It is also given direct information by members of EU. Because HE's long lobbying history and its reputation, it has many contacts. Lobbying is the fourth element and if everything else have made well it will be quite easy because strong case is much easier to sell politicians and get right results. Out of these four elements it is important anticipate issues and establish priorities (McGrath, 2005, p81). It is easier to negotiate if lobbyist is prior made priority list of the lobbying subjects and negotiated that with his/hers client. EU isn't closed box also external climate is influencing it. External climate analysis belongs to SWOT (Strengths, Weaknesses, Opportunities and Threats) or PEST (Political, Economic, Social and Technological) analysis. (McGrath, 2005, p81–82.)

2.2. Situational analysis, SWOT

2.2.1. Strengths

- HE has long relationships with EU politicians which are important for lobbying in EU (Woll, 2006, p461).
- HE has long history providing accurate and reliable information (McGrath, 2005; Broscheid and Coen, 2007).
- Because of good relationships between EU and HE, it has privileges, like getting privilege information about what is happening in the EU. HE is also really often asked consultation. (Broscheid and Coen, 2007.)

- HE has being on health forums and gained success and access. The forums where it is in are: the European Health Forum (EHF) which is Open Forum and the EHF Permanent group. (Greer et al, 2008, p422–423; EU Public Health, 2009.)
- HE is big company so it has plenty of people e.g. organize events.
- Company have many permanent alliances (McGrath, 2005, p136).

2.2.2. Weaknesses

- NHA is only working in the UK, so it isn't recognized in the whole EU.
- 150 000£ isn't so much to comparing the big food company's potential lobbying budget which are against NHA's goals, e.g. Unilever was spending 400 000–450 000€ in 2007 for direct representation of its interest (Register of interest representatives, 2009).
- HE is planning to be in business long term so cannot push the topic as a short term win, but this reputation of being long term relationship has build privileges and trust.
- For me it isn't always most effective to meet people personally, because I cannot speak everybody's mother language (Blow, 2005, p321). It is possible have somebody else from the company, who can speak their language.

2.2.3. Opportunities

- Make new contacts
- widen own and corporate expertise
- Get media's attention in many countries
- Predict and review workload every quarter. It would not be made too tight because there are always some surprises which take money and time. (McGrath, 2005, p81.)
- Build up powerful coalition, because coalitions have more effect (McGrath, 2005).
- Framing the issue so that it's belongs to certain department (Baumgartner, 2007). In this case it is best to concentrate on health.
- Show issue in particular light (Baumgartner, 2007, p485). In this case health threatening, because it is probably the most effective.

2.2.4. Threats

- Client wants quickly something visible to happen (Burrell, 2005, p303).
- Alliance, which has 40 organizations, may have conflicts between organizations because e.g.

there can be different priorities. So it is important to have objects prioritized order on paper.

- When having lobbying coalition it can be hard to manage it (McGrath, 2005, p132–135):
 - It can be hard to find organisations which are interested on the same topic
 - Coalition can be too big to compare resources.
 - If having coalition, check:
 - After having all the members, establish explicit guidelines for managing and organisation
 - Do you have limited goals, which can be flexible?
 - All members are playing apart?
 - Because organization must be able to operate swiftly and flexibly. Check do you have only few people who have authority to make quick decisions?
- EU Department's overlap each other can create issues in decision making (Baumgartner, 2007).
- Find the right language/translation between experts and politics (McGrath, 2005, p55).
- Can not always interpret experts or politicians (McGrath, 2005, p55).
- Media usage can backfire.
- Things what spoke person can say or do.

2.3. Aims of the strategy

2.3.1. Goal:

Goal is to get people aware of trans fat's health influences and get trans fat's noticed on food labels and in restaurants etc. in the whole EU. Main goal is to get EU wide legislation.

2.3.2. Objectives:

1. EU wide legislation, for nutritional labels
2. EU wide legislation, for nutritional list to all restaurants etc. next to menu
3. Get people aware of the trans fat's health influences

2.4. Why coalition

Coalitions are formed with those who share our interest, or when we have to fight our cause against

wide range of opposed interests. The degree to which interest groups are part of strong outside coalition, it is more likely to influence the strength of an opinion voiced to alter a legislative act. (Michalowitz, 2007, p135.) There is also costs from forming coalition, like when forming coalitions agenda, it is usually little different than what coalition's members original had. In EU it isn't common to have coalition but it is usual only share resources. (Mahoney, 2007.)

3. MAIN RESEARCH

3.1. Initiation

First find an expert who will speak about trans fats in public, presentations, etc. Expert should be highly recognized. Gather all information and studies which have been discovered on this matter. If there isn't enough existing reliable information, expert should be able to make his own research. Then to find another person who would be a spokesperson for this matter, because one is usually more effective than a lobbyist. Lobbyist should be the person who is stating facts and backing up the spokesperson. (Tierney, 2002, p114.) He or she should be a member of NHA and suffering from coronary heart disease because when the effects have a face it is more difficult to say no. He or she should be looking presentable if he or she went on TV. This person should tell about his days very openly, e.g. how disease affects one's life and what one did eat before. One should keep a blog, be on Facebook and send videos of his or hers life on YouTube. In the initiation it will be good to look for potential coalition partners and share resources.

3.2. Who to contact?

3.2.1. European commission

EU is a multi-level system so it has many different access points (Woll, 2006, p461–463). In NHA's issue, when trying to get new legislation, the most effective access point is direct contact with commission officials (McGrath, 2005, p204; Miler and Schlesinger, 2005, p675–676). Formal propositions for EU legislation are first made in Commission and after sent to parliament and council of ministers for consultation (McGrath, 2005, p. 204; Europa glossary, 2009). For making new legislation Directorate-Generals play an important role (McGrath, 2005, p204). In health issue The Directorate-General for Health and Consumer Protection (DG SANCO) is the most important place to lobby. (See Appendix 2 for DG SANCO's management structure) Greer et al (2008, p411) have said that DG SANCO is “obvious, cheap ‘entry-level’ option and an arrow in the quiver of almost any organization, no matter how elaborate its other forms of representation.”

3.2.2. European parliament and others

European parliament can make suggestions to Commission and to be consulted about some issues

(Varela 2009). By lobbying to European parliament, it can use its pressure and influence to commission. This is usually good route when wanted some national thing to be EU wide. (Miller, 2000, p179; McGrath, 2005.) EP has a committee for Environment, Public Health and Food Safety (ENVI) which handles the labelling and safety of foodstuffs (European Parliament, 2009). In NHA's case DG SANCO is the main target but if they will not listen so EP can be used to pressure Commission and so get the issue to DG SANCO. Also when the legislation act is going forward to the EP, it is important to have EP on your side. If members of parliament aren't hearing so it would be good to trace public opinion and use that as a way to get their attention. Especially now just before elections candidates are really interested what people think.

Alternative routes in EP's voting situations are political parties because they can decide how members should vote (McGrath, 2005). This can be relevant way to lobby if the most of the EP is not supporting this new legislation. Could also contact to Committee of Permanent Representatives (COREPER) but I think in this matter it isn't so effective than my first routes. Media and grassroots tactics can also be used to pressure politicians to make certain decision. In NHA's case I will be concentrating new media, like websites, Facebook and you tube but if there is some opportunities to have the case to media it must be used. I will send press releases and have spoke person and professor ready for interviews.

3.3. Exact primary contacts

3.3.1. DG SANCO

DG SANCO is the primary target and more specific safety of food chain and there on food law, nutrients and labelling which Basil Mathioudakis is responsible (see appendix 2). Contact information is found from Commission directory (2009). There are also many more people who could/should be consulted but I think it is better to concentrate only one at the first. If he will not listening then contact other people is relevant. When NHA's issue is getting forward, lobbying should get wider and it should reach every participant of that topic. At that point is good to give consultation or having presentations. One channel where to consult is the website for Consultation: Food Safety (2009)

3.3.2. Other exact contacts

European Food Safety Authority (EFSA) (2009) should be consult about trans fats health effects so the can start immediately do their own research. More exactly panel on food Additives and Nutrient

Sources (ANS) added to food and the person to contact is Hugues Kenigswald who is head of the unit. Contact information is found EFSA staff directory (2009) (see also appendix 3)

From Parliament Environment, Public Health and Food Safety committee should also be briefed. There Miroslav Ouzky who is chairman and Satu Hassi who is vice chair women. Hassi because she is Finnish, so I can approach her with hers native language. (European parliament ENVI, 2009.)

European health forum (2009) will be one channel for discussion and effecting members of EU. Register of Interest representatives (2009) is the place through which HE is getting information and from there it is possible to find information of potential coalition or opposition members.

3.4. With who co-operate?

During main research and having contacts and meetings will determine if organize coalition, but potential partners are

- European Observatory on Health Systems and Policies (2009)
- Potential co-operates are also those which send comments to the discussion paper on nutritional claims and functional claims (Food safety, 2009)
- Also potential coalition partners could be: Organic food Associations, fair trade companies, green party, public health care, health organisations and food companies which do not make products which have noticeable amount of trans fats.

4. TACTICS

4.1. How to contact?

First to send a position (Appendix 1) and briefing paper, which have all the essential information, to key publics and suggest meeting. Then call after the paper and arrange meeting, presentation, consultation or diner.

In the briefing paper could be used former statements (food safety, 2009). About labelling, e.g. label must show nutritional informational, like fat (DG for Health and Consumers, 2007). Why not trans fats? More about regulations see Corrigenda (2006).

4.2. Direct lobbying

When wanting to meet Commissioners, contacting should start from Chef de Cabinet, who controls the Commissioner's diary (Miller, 2000, p182). In this case meeting with DG SANCO is more important than commission. When arranging meeting it is important to remember confirmation and re-confirmation day before and send information by fax or email, where, when and with who. Meeting should take approximately 30 minutes. (Thomson and John, 2007, p45.)

Presentations can last 7–8minutes, and those must be simple and to the point. After presentation should give a paper from which is possible to refresh their memory in three minutes (Miller, 2000, p146). Consultations is answering questions which politicians have (McGrath, 2005, p51–52). Third way is to make a formulated paper by using lawyers which politician can use right away. (Bracker, 2005, p300–301.)

This campaign will operate also grassroots level. In our website we try to get people to send personal email to their MEP's (McGrath, 2005, p103; 110). We also want people to go their local politicians. Now is MEP election, we encourage people to ask questions from their candidates. We create a group to Facebook where we inform people about trans fats and have a link to our website where they can learn more of it.

We will send press releases and will try to get this issue to media but we do not make commercials because in EU wide it isn't cost effective. Grassroots campaigns are also important to get media's attention (McGrath, 2005, p113)

5. OPPOSITION

Biggest opposition is food industries which makes foods which have large amount of trans fats because of this big food producing countries can opposed this legislation act. It is important think before what kind of arguments they will use. (Miller, 2000, p183; McGrath, 2005, p55.) Also how we will address their arguments (McGrath, 2005, p55). They will probably argue that putting more information on food and restaurants will cost and make even harder to read nutritional information. They will also say that the research which have made is too little to show connections between trans fats and diseases, they will claim that something else maybe influencing. They also can say that the information isn't reliable and they can have their own research which has different result. One argument is the trans fats can lead to frightening people. Some companies will need two kind of labelling for different markets.

To counter these arguments, it is important to have good reliable background research, like the expert and research which you are using are reliable and recognise. When people stops using processed food, different unprepared foods will be more successful which usually need more workforce, e.g. restaurants needs more workforce. Only bad thing is the foods will costs, but not so much because when it gets popular the extra costs per meal will be really small. Healthier eating habits cuts cost on health care so it is really good for public heath care countries. Private health care will not like this but it won't openly oppose this.

6. DISCUSSION/EVALUATION

First the objectives will be measured were those: Specific, Measurable Achievable, Realistic, Relevant, Targeted and Timed (SMARRTT) (Watson and Noble, 2007, p174). Results assumption is usually that lobbying have always influence but still usually lobbying campaign is valued by result (Miller, 2000, p133–134). If campaign is valued by influence, first must determine what is influence and it isn't so simple. Also it is difficult or impossible to investigate influence. Another way to measure is quantitative ways, like how many meetings and with whom.

This campaign will be evaluated by getting results and quantitative methods, how many: meetings, visits in website, views on You Tube video, Facebook group members etc.

7. TIMETABLE STARTS 4.5.2009:

4.5. Meeting with client

4.5–1.6. Research

4.5.–1.6. website building

- updating 2.6.2009–3.5.2010

4.5.– Spoke person starts his or hers blog, log in to Facebook and sends videos to You Tube

8.6. Briefing/position paper

9.6. Sending out briefing paper

12.6. Phone calls

15.6.– Meetings, dinners and golf

- Basil Mathioudakis , DG SANCO
- Hugues Kenigswald, ANS
- Miroslav Ouzky and Satu Hassi, Parliament Environment, Public Health and Food Safety committee

15.6.– Giving presentations and consultations

- DG SANCO

1.6.– After research

- Launching Facebook group
- Press releases, based on reseach
- Maybe getting our expert to TV–shows

1.7. Funny You Tube video, distribution by Facebook group and website link.

2.7.– Encouraging Grassroots campaign

7.7.–9.7. ANS meeting

1.8.– Commenting government employees blogs

7.9.–9.9. ANS meeting

11.1.2010– MEP's consultations or presentations?

8. BUDGET

What?	More specific	How much?	more specific
Main research		50 000£	
	self searching, databasis		10 000£
	scientist		20 000£
Media		20 000£	
	website building		2 000£
	website updating		3 000£
	You Tube video		10 000£
	Facebook updating		2 000£
Meetings		20 000£	
	diners		2 000£
	presentations		5 000£
	consultations		2 000£
	golf		5 000£
Preserving contacts		10 000£	
Costs inside the company		50 000£	
	staff		30 000£
	facilities		10 000£
	travels		10 000£
Totals		150 000£	111 000£

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Appendix 1: Position paper

The National Heart Alliance
70 Cowcross Street
London EC1M 6EJ
+44707563251
jackson.jefferson@nha.co.uk

8th June 09

Dear Sir/Madam,

Preventing coronary heart disease – Concern about foods trans fats

The National Heart Alliance (NHA) was established 1983 to reduce the risk of coronary heart disease in the UK. Now it has 40 organizations and it is well recognised in UK. NHA have worked with UK parliament on many issues to reduce coronary heart disease.

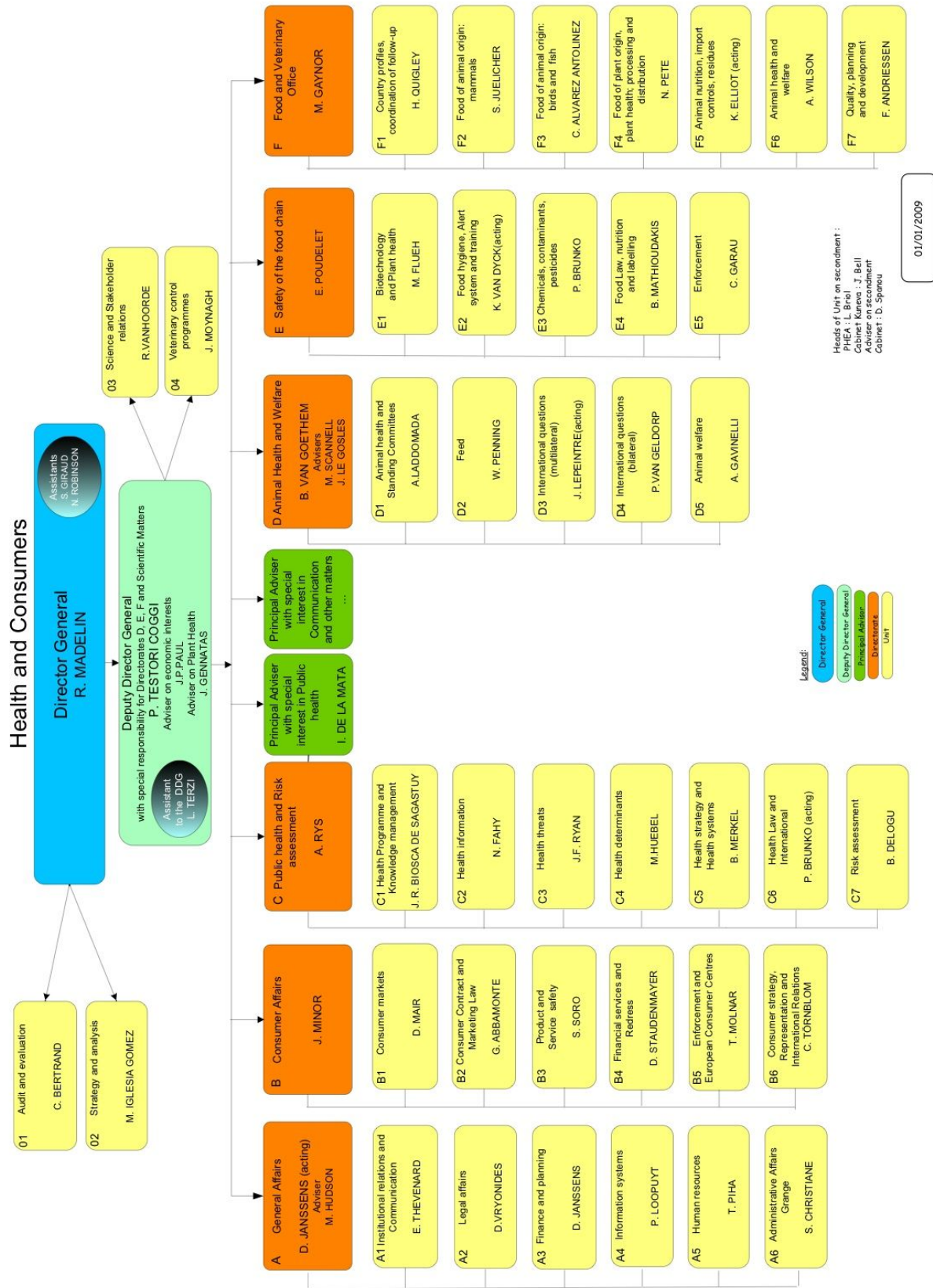
NHA have got more concerned with trans fats which increases LDL cholesterol (bad cholesterol) and lowers HDL cholesterol (good cholesterol) and this can lead to many different diseases, like coronary heart disease and Type 2 diabetes. There is much research from 2005, like Hast (2007), Kelly (2005), Mäkelä (2009), etc. NHA thinks that this matter is so important that UK-level legislation isn't enough so we want EU wide legislation to inform public which foods have trans fats, include trans fats in nutritional label and restaurants should also present nutritional list next to menu.

Trans fats are fatty acids which occur small amounts in dairy products and meat. The problem is processed food which has trans fats through partial hydrogenation, like margarines, biscuits, cakes and fast foods. Only benefit of partial hydrogenation is extended self-life. There are no known health benefits.

Yours faithfully

Sir Jackson Jefferson
Chairman

Appendix 2: DG SANCO, management structure.
 (http://ec.europa.eu/dgs/health_consumer/chart.pdf)



Appendix 3: EFSA, management structure.
 (http://www.efsa.europa.eu/EFSA/AboutEfsa/WhoWeAre/efsa_locale-1178620753812_EFSAStructure.htm)

