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The lobbying of cities in the European Union

Lobbying miast w Unii Europejskiej

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Lobbying miast w Unii Europejskiej

Większość polityk Unii Europejskiej dotyczy bezpośrednio miast, ale ich rola w formułowaniu tych polityk jest niewystarczająca. Dlatego miasta podejmują działania o charakterze *para-diplomacy* i lobbying na szczeblu UE, niezależnie od rządów krajowych. Wykorzystują przy tym możliwości oferowane przez wielopoziomowy system zarządzania UE i politykę otwartości i deliberacji Komisji Europejskiej. W artykule dokonano analizy wzorów i strategii reprezentacji interesów miast na poziomie UE, ich adaptacji do wymagań unijnego systemu zapośredniczenia interesów, a także głównych motywacji podejmowania lobbyingu. Stawiana jest teza, że miasta stosują dwie główne ścieżki reprezentacji interesów: zakładanie stałych przedstawicielstw i bezpośredni lobbying w Brukseli oraz zaangażowanie w europejskie stowarzyszenia miast. Można wyodrębnić dwa rodzaje motywacji aktywności lobbyingowej: mobilizację regulacyjną i mobilizację finansową. Relacje miast z instytucjami UE podlegają zaawansowanej instytucjonalizacji.

The lobbying of cities in the European Union

Most European Union policies directly affect cities, but their role in formulating these policies is insufficient. Therefore, cities are undertaking para-diplomacy and lobbying at the EU level independently of national governments. They use the opportunities offered by the EU, namely multilevel governance system and the European Commission's policy of openness and deliberation. The article presents an analysis of the patterns and strategies of representation of cities' interests at the EU level, their adaptation to the requirements of the EU interests intermediation system, as well as the motivations for undertaking lobbying. It is argued that cities follow two main channels of interests representation: permanent representations with direct lobbying in Brussels and activity in European city networks. Two types of motivations behind lobbying can be distinguished: regulatory mobilization and financial mobilization. Their relations with EU institutions are subject to advanced institutionalization.

Introduction¹

Europe is one of the most urbanized continents in the world, and more than two-thirds of Europeans living in urban areas. Urban development has an important economic, social, innovative and political impact on the European Union (EU). Moreover, most EU policies directly affect cities. Nevertheless, EU policies are formulated through a process of negotiation between the EU institutions and the member states, sometimes involving the regions. There is a conspicuous lack of mid-level representation, i.e., cities. Numerous studies point to the ‘underrepresentation of cities and sub-national regions as sites of governance or partners in global governance’². Therefore, cities have begun to represent their interests at the EU level often independently of national governments, in the form of lobbying. Lobbying of cities at the EU level is a phenomenon of sorts, as cities that are public actors initiate lobbying independently of national central authorities, maintain independent relations with the EU institutions, fight for their own interests sometimes contrary to the government’s position. These activities are referred to as para-diplomacy³ and may be bilateral in nature, e.g., establishing representations of cities in Brussels and direct contacts with EU institutions, or multilateral in nature, e.g., cooperation of cities in international associations.

The multilevel system of governance in the EU offers opportunities for the participation of subnational actors in the decision-making process, which means that the hitherto dominant role of states is beginning to be challenged. In the 1990s, with the development of regional policy, the importance of regions increased, cities – only after 2000. In 2016, the Urban Agenda that represents a new multi-level working method promoting cooperation between Member States, cities, the European Commission (EC),

1 This work was supported by Jean Monnet Centre of Excellence „Future of Europe in research and studies” in ERASMUS+; under grant nr 600136-EPP-1-2018-1-PL-EPPJMO-CoE.

2 M. Amen, N. Toly, P. McCarney, C. Segbers, *Sighting or slighting cities in international relations*, [in:] *Cities and global governance. New sites for international relations*, eds. M. Amen, N. Toly, P. McCarney, C. Segbers, Ashgate, London 2011, p. 219.

3 R. Tavares, *Paradiplomacy. Cities and regions as global players*, Oxford University Press, New York 2016, p. 7.

and other stakeholders was adopted. However, the role of cities in the EU policies compared to the influence of regions is still clearly smaller.

The representation of territorial interests at the EU level is the subject of numerous studies, but the vast majority of them concern the analysis of regional lobbying. Extremely rare are the attempts to explain the patterns of representation of cities' interests before EU institutions, their lobbying strategies and influence potential. Few publications available mainly concern cities in Western Europe and analyze the role of cities in the multilevel governance of the EU⁴, the forms of international cooperation⁵, the influence of policy context on regional involvement in the EC⁶, the conditions of mobilization of territorial actors⁷, the impact of cities on climate policy⁸, how the physical presence of city and regional offices transforms Brussels⁹, or the issue of cities' para-diplomacy¹⁰.

The article is a review essay with elements of contextualization and the main objective of the article is to analyze the patterns and strategies of cities' interests representation at the EU level, both bilateral and multilateral, as well as motivations and conditions of their lobbying activity. It is argued that cities have become important non-state actors in the European lobbying arena, that they employ diverse strategies of interests representation, that their motivations are complex and the representation of their interests is institutionalized. However, their role in EU policies is still insufficient.

- 4 *European metropolitan governance. Cities in Europe – Europe in the cities*, eds E. Antalovsky, J. S. Dangschat, M. Parkinson, Europaforum, Wien 2005.
- 5 T. Herrschel, P. Newman, *Cities as international actors. Urban and regional governance beyond the nation state*, Palgrave Macmillan, London 2017.
- 6 M. van Hecke, P. Bursens, J. Beyers, *You'll never lobby alone. Explaining the participation of sub-national authorities in the European Commission's open consultations*, "Journal of Common Market Studies" 2016, vol. 54 (6), p. 1433–1448.
- 7 M. Callanan, M. Tatham, *Territorial interest representation in the European Union: actors, objectives and strategies*, "Journal of European Public Policy" 2014, vol. 21 (2).
- 8 K. Kern, *Cities as leaders in EU multilevel climate governance: embedded upscaling of local experiments in Europe*, "Environmental Politics" 2019, vol. 28(1).
- 9 C. Hein, *Cities (and regions) within a city: subnational representations and the creation of European imaginaries in Brussels*, "International Journal of Urban Sciences" 2015, vol. 19(1), p. 93–107.
- 10 R. Tavares, *Paradiplomacy – Cities and states as ...*

The article presents the results of existing research and the author's own research on the representation of the interests of selected European cities, analysis of official EU documents and statements, reports and expertise, information on the websites of cities and their representations, as well as numerous references to the literature of the subject. The analysis is part of the neo-institutional perspective of lobbying in the EU research, which aims to reconstruct formal and informal rules of interests representation and to identify the determinants of their origin¹¹. This approach will allow not only to reconstruct the dominant patterns and strategies of representation of cities' interests at the EU level, but also to analyze the motivations of cities in undertaking lobbying activities.

Different terms are used in the analysis, often interchangeably: interests representation and lobbying. Interests representation is a term with a broader meaning and refers to the representation of organized interests, while lobbying is defined as actions to influence the decision-making process¹². Although these terms differ, they are often used synonymously because in practice it is very difficult to separate interests representation from lobbying. This is especially visible at the EU level where the EC often treats city and regional representatives as private entities¹³, whose lobbying strategies are not very different from those used by other stakeholders, such as business or NGOs.

Lobbying of cities as an element of the EU interests intermediation system

The process of the development of the cities' representation in the EU is closely related to the formation of the EU interests intermediation system. The evolution of the EU system began with the establishment of the European Communities, but the catalyst for the expansion

- 11 The analysis refers to research: J. Greenwood, *Interest representation in the European Union*, Red Globe Press, London 2017; *Lobbying the European Union. Institutions, actors, and issues*, eds. D. Coen, J. Richardson, Oxford University Press, New York 2009.
- 12 K. Jasiński, M. Mołęda-Zdziech, U. Kurczewska, *Lobbying. Sztuka skutecznego wywierania wpływu*, OE, Kraków 2006, p. 21.
- 13 R. Trobbiani, *European regions in Brussels: towards functional interest representation?*, (Bruges Political Research Papers 53/2016), p. 4.

of lobbying was the Single European Act and the development of sectoral policies, including regional and cohesion policy, environmental, energy and climate policies. The prevailing view among scholars of this system is that it reflects the characteristics of the pluralist or even elite (or chameleon) pluralist model¹⁴ more than the neo-corporatist model. This is indicated not only by the huge number of stakeholders competing for access to the decision-making process, but also by the openness of EU institutions to contacts with non-state actors. Among the growing number of different lobbying stakeholders at EU level, city and regional representations have emerged in the 1990s. The dynamic growth of their lobbying is determined by three factors. First of all, with the emergence of regional and cohesion policy and the adoption of the principle of subsidiarity, cities and regions have become important actors in the EU. Secondly, the EU through multilevel governance offers many opportunities of access for cities and regions to the decision-making processes. Thirdly, EU policies are increasingly detailed and often implemented at the local level, requiring feedback from local entities on their effectiveness. This makes cities important players in the European lobbying arena.

The European Commission (EC), which is the main target of lobbying at the EU level, has been pursuing a policy of openness, transparency and inclusiveness for two decades in line with the good governance model¹⁵ and deliberative governance. This policy involves broad participation of stakeholders in the Commission's decision-making process (through public consultation), which allows it to gain public support and input legitimacy¹⁶. Thus, non-state actors have access to the decision-making process, can successfully represent their interests. Cities are eager to take advantage of these opportunities. They adapt their interests representation strategies to the requirements of the EU interests intermediation system. When they initiate lobbying activities at the EU level, their strategies are aligned with

- 14 D. Coen, A. Katsaitis, *Chameleon pluralism in the EU: an empirical study of the European Commission interest group density and diversity across policy domains*, "Journal of European Public Policy" 2013, vol. 20, issue 8, pp. 1104–1119.
- 15 European Commission, *European governance. A white paper*, COM (2001) 428 final, Official Journal C 287, 12 X 2001.
- 16 A. K. Cianciara, *Legitymizacja na wejściu*, [in:] *Leksykon lobbingu w Unii Europejskiej*, eds. J. F. Czub, A. Vetulani-Cęgiel, Elipsa, Warszawa 2018, p. 78.

the rules of the European lobbying arena. Cities, like other lobbying actors, are subject to both top-down and bottom-up Europeanization, as well as socialization pressures and the need to adapt within EU-level networks¹⁷. Thanks to Europeanization, cities can exert influence not only on EU institutions but also on national policies. They can then act as change agents at the national level¹⁸.

The last decade shows a paradigm shift in the representation of urban interests at the EU level, as more of the represented interests are of functional rather than territorial nature and concern specific issues rather than generally defined interests of local government units. This applies not only to cities but also to regions. The change is to some extent due to the preference of the EC, which under expert groups and public consultations expects expert knowledge and concrete proposals from city for solving the problems. As a result, cities collaborate through various networks with partners from business, academia, or NGOs. They include functional interests into representation channels established by regional institutions¹⁹.

A specific feature of city lobbying is para-diplomacy – that is, exerting influence on decision-making processes at the transnational level as entities independent of national authorities. The strength and effectiveness of their lobbying is evidenced by the adoption of an ‘Urban Agenda’ by the EU²⁰, many cases of direct lobbying in the EU lawmaking process (e.g., the service directive²¹), but also by the frequently used term ‘urban lobby’²². Sometimes cities exert influence by using a by-pass strategy, i.e., by completely bypassing national government or even opposing it, and lobbying directly to the EU institutions. The most common reason is conflict

17 A. K. Cianciara, *Wzory europeizacji zewnętrznej: mechanizmy, uwarunkowania, rezultaty*, “Studia Europejskie-Studies in European Affairs” 2013, vol. 3, p. 11.

18 A. K. Cianciara, A. Burakowski, P. Olszewski, J. Wódka, *Europeizacja partii politycznych i grup interesu w wybranych krajach Partnerstwa Wschodniego i kandydujących do Unii Europejskiej*, ISP PAN, Warszawa 2015, p. 41 and 51.

19 R. Trobbiani, *European regions in Brussels: towards functional interest...*, p. 15–16.

20 M. Parkinson, *Urban policy in Europe – Where have we been and where are we going?*, [in:] *European metropolitan governance. Cities in Europe – Europe in the cities*, eds. E. Antalovsky, J. Dangschat, M. Parkinson, Europaforum, Wien 2005, p. 7–31.

21 H. Bartik, A. Wolffhardt, *Cities and services of general interest – A case study in deliberative European governance*, [in:] *European metropolitan governance cities in Europe...*, p. 40.

22 H. Bartik, A. Wolffhardt, *Cities and services of general interest*, p. 33–48.

of interests in relations with the national central government, including political divisions²³. As an example of a by-pass strategy, one can mention lobbying in 2019–2020 of the mayors of Bratislava, Budapest, Prague and Warsaw, the capitals of the Visegrad Group countries at the EU level. Cities signed a “Pact of Free Cities” and demanded that the EU institutions create direct green urban funds in the EU’s next Multiannual Financial Framework²⁴. They argued for allocating eight percent of the EU funds to cities. In their view, conservative-populist governments in their countries have inadequate climate policies, so cities should be able to benefit directly from the EU funds. These demands were contrary to the V4 governments, which planned to veto the adoption of the EU Financial Framework and the European Recovery Package.

The main cities’ interests representation channels at the EU level are: establishing permanent representations in Brussels and participation in European associations of cities. The first representation in Brussels was established in 1984 by Birmingham and Strathclyde Regional Council, followed by Hamburg in 1985. Since then, the number of direct territorial delegations in Brussels has grown rapidly to 200 in 2020²⁵. Nevertheless, city representations constitute a small percentage of the total number of stakeholders in the European lobbying arena. Currently, more than 12,500 stakeholders are engaged in lobbying activities at the EU level, with the vast majority representing business and economic interests, a second large group being NGOs, and less think tanks, academic institutions and professional consultancies. Entities representing territorial interests are few – 560, of which only about 40 represent cities²⁶. In contrast, there are only 24 city representations in Brussels.

23 M. Tatham, *Paradiplomats against the state. Explaining conflict in state and substate interest representation in Brussels*, “Comparative Political Studies” 2013, vol. 46(1), p. 63–94.

24 PAP, *Mayors of V4 countries’ capitals sign Package of Free Cities*, “The First News” [online], 16 XII 2019 [accessed: 11 IV 2021], available at: <<https://www.thefirstnews.com/article/mayors-of-v4-countries-capitals-sign-package-of-free-cities-9284>>.

25 CoR regional offices, available at [accessed: 20 IV 2021]: <<https://cor.europa.eu/en/members/Documents/regional-offices-old.pdf>>.

26 Transparency register – statistics, available at [accessed: 18 IV 2021]: <<https://ec.europa.eu/transparencyregister/public/consultation/statistics.do?locale=en&action=prepareView>>.

Institutionalization of city lobbying in the EU

The main institution representing the interests of cities and regions is the European Committee of the Regions (CoR). It has a consultative function in matters concerning the regional or local level: economic, social and territorial cohesion, European Funds, etc. The CoR was supposed to be an important 'voice' of European cities and regions, but its role in the EU decision-making process is small due to limited competences. Nevertheless, the CoR is seeking to expand its authority. However, there are regional particularisms that lead to rivalries in the CoR, which weakens its relevance. Moreover, the CoR tends to represent intra-EU political divisions more than the demands of regions and cities, which also undermines its role as a representative of territorial interests²⁷.

In this situation, cities themselves must seek opportunities to directly influence EU policies. Of greatest interest is the European Commission because of the monopoly on legislative initiative and its executive powers, as well as the ability to access its decision-making process. In order to participate in public consultations or expert groups, or to directly contact the Commission and the European Parliament, almost all stakeholders are required to sign up to the Transparency Register. All sub-national public authorities such as cities, local and municipal authorities, or their representation offices, and associations or networks, are expected to register²⁸.

Since 2007 the EC has held a Structured Dialogue on cohesion policy, but since 2014 it has taken the form of the Structured Dialogue with European Structural and Investment Funds' partners. Its purpose is to share information with non-state actors on the EU regional policy, including urban policy²⁹. The members of the Dialog are 59 associations representing regional, local, urban and other economic and social partners.

27 A. Poth-Mögele, *EU impact assessment. Better legislation and policy through early involvement of local and regional government*, Council of European Municipalities and Regions, Brussels 2014, p. 12.

28 Transparency register implementing guidelines, 26 VI 2020, p. 9, available at [accessed: 10 IV 2021]: <<https://ec.europa.eu/transparencyregister/public/StaticPage/displayStaticPage.do?locale=en&reference=GUIDELINES>>.

29 Structured dialogue with partners at Union level, European Commission, available at [accessed: 10 IV 2021]: <https://ec.europa.eu/regional_policy/en/policy/communication/structured-dialogue-with-partners/>.

City interests are represented by Capital Cities and Regions Network, Conference of Atlantic Arc Cities, Energy Cities, EUROCITIES, European Network of Cities and Regions for the Social Economy. Expert meetings are held twice a year. In addition, the EC is developing direct cooperation with the representations of regions and cities in Brussels. Cooperation may be carried out in two forms: dialogues with EU regional offices and annual meeting of the Commissioner for Regional Policy with EU regional offices³⁰. The first – quarterly meetings are aimed at discussion of topics related to cities and regions in Cohesion Policy. To date, due to the COVID-19 pandemic, the number of such meetings has been limited. In contrast, meetings between the Commissioner for regional policy and regional offices take place much less frequently, only once a year.

Meetings between the EC and city representations are not very frequent, but their formalization and regularity are evidence of their advanced institutionalization. Direct contacts are intended primarily for the exchange of information, but also to enable the Commission to submit requests and proposals prepared by the cities. One of the important events in Brussels is the European Week of Regions and Cities that gathers several thousand participants: stakeholders from politics, civil society, research and business to discuss common challenges and possible solutions for cities and regions. This event provides a platform for capacity building, exchanging good practices, as well as networking.

Lobbying channels of cities at the EU level

Since the CoR is treated as an institution with little relevance for interest advocacy, cities focus on two channels of interests representation towards EU institutions: individual activities and participation in European organizations.

Permanent representations of cities in Brussels

Cities carry out individual lobbying most often by opening a permanent representation in Brussels. Currently, there are about 200 regional and local representations active in Brussels, including 24 city or city-region

30 Cooperation with EU regional offices, European Commission, available at [accessed: 8 IV 2021]: <https://ec.europa.eu/regional_policy/pl/policy/communication/regional-offices/>.

representations³¹. Their forms, status and names vary. There are independent city representations, e.g., Helsinki EU Office, as well as city-region offices, e.g., Stockholm Region EU Office, Bratislava Region Brussels Office. In most cases, city representations are linked to the region. Sometimes this connection is due to the historical status of the city such as the Hanse Office, which represents Hamburg as the lead partner and the Schleswig-Holstein region³². This is different for the Czech capital Prague, which has a separate office in Brussels from its Bohemia region.

In the first period of the establishment of the cities and regions representations in Brussels, they were not fully recognized by the EU member states, and in some cases there were differences or even conflicts between the central authorities of the states and the cities and regions concerning their independence in establishing international relations. The central authorities took the position that the activities carried out by the offices were of a diplomatic nature and were reserved for the central state bodies³³. Over time, a more conciliatory nature of this cooperation has been developed.

City representations in Brussels are different from the offices of other interests organizations because they represent the public sector and democratically elected authorities³⁴ and interests specific to the urban agenda that are related to urban transport, health care, education, migration, sustainable development and social cohesion. The main functions of the city representations are: information management, networking, lobbying in EU policies, promotion (see Table no. 1). The primary reasons for creating permanent representations vary, but mostly include: the search for funding opportunities, opportunities to lobby, the growing pressure to be present in Brussels to expand or preserve powers in the country³⁵.

31 CoR regional offices, available at [accessed: 1 IV 2021]: <<https://cor.europa.eu/en/members/Documents/regional-offices-old.pdf>>.

32 T. Herrschel, P. Newman, *Cities as international actors ...*, p. 162.

33 Ibidem, p. 160.

34 J. Beyers, T. Donas, *How regions assemble in Brussels. The organizational form of territorial representation in the European Union*, "The Journal of Federalism" 2012, vol. 43(4), p. 528.

35 M. Huyseune, T. Jans, *Brussels as the capital of a Europe of the regions? Regional offices as European policy actors*, Brussels Studies, February 2008, p. 5, available at [accessed: 2 IV 2021]: <<https://journals.openedition.org/brussels/547?lang=en>>.

Most of the city representations are listed in the EC Transparency Register, interact directly with EU institutions, and take part in public consultations (see Table no. 1). The status of representative offices, their size and costs of lobbying activities vary and depend on the location

Table no. 1. Permanent representations of selected cities in Brussels

City/City-Region	Functions/Objectives	Transp. Register	Annual costs of lobbying
Delegation of Prague to the EU	<ul style="list-style-type: none"> – increase awareness of Prague and interests in EU institutions – provide feedback on Prague's interests and activities back – communicate issues and the possibilities 	–	No data available
Helsinki EU Office	<ul style="list-style-type: none"> – supervises interests and promotes visibility – provides information on EU legislation – co-operation opportunities. 	X	600,000 € – 699,999 €
Tampere Region EU Office	<ul style="list-style-type: none"> – lobbying for the regional interests – follow EU programs and funding opportunities – identify partners for projects 	X	200,000 € – 299,999 €
Ile-de-France Europe	<ul style="list-style-type: none"> – informing and raising the awareness on EU policies – promoting the interests to the EU institutions – representing the regional and local authorities 	X	700,000 € – 799,999 €
Stuttgart Region European Office	<ul style="list-style-type: none"> – service and support for stakeholders in the Stuttgart Region – representing interests with the EU institutions – involvement in networks 	–	No data available
Representation of Budapest to the EU	<ul style="list-style-type: none"> – promote the city and find partners for projects – monitor EU policy 	X	200,000 € – 299,999 €
Bratislava Region Brussels Office	<ul style="list-style-type: none"> – enhance the presence of Bratislava in European affairs – cooperation with institutions in Brussels – networking and promoting 	X	50,000 € – 99,999 €
Diputació de Barcelona Brussels Office	<ul style="list-style-type: none"> – cooperation to promote projects with the EU funds – exchange of good practices, participation in networks – to place the municipalities in the EU decision making 	X	100,000 € – 199,999 €
Stockholm Region EU Office	<ul style="list-style-type: none"> – communicating with the EU institutions – monitor the EU legislation – state joint positions towards EU policy makers 	X	800,000 € – 899,999 €
City of Gothenburg EU Office	<ul style="list-style-type: none"> – represents the city in Brussels, discussing policy recommendations with EU policy makers – monitor the EU legislative work and funding opportunities 	X	300,000 € – 399,999 €
City of London Office	<ul style="list-style-type: none"> – strengthen relations with EU institutions – better contact with EU decision-makers – communication with MEPs and the international financial community 	X	1,750,000 € – 1,999,999 €

Source: Own study on the basis of: <https://cor.europa.eu/en/members/Documents/regional-offices-old.pdf>; websites of cities and <https://ec.europa.eu/transparencyregister/public/homePage.do>. The main criteria of selection of city representations in the table was the level of their activity in Brussels and accessibility of information on their lobbying. Information on annual costs of lobbying is a third-source data based on self-declaration in the EC Transparency Register.

in the administrative structure of the state, the wealth of a given city, the objectives of creating such an office. It turns out that big cities like Berlin, Paris, Madrid, Rome either don't establish representations in Brussels at all, or if they do, they are not very active. In contrast, cities with medium economic potential, such as Helsinki and Gothenburg, open representations that are extremely active, participate in EC consultations, and have direct contacts with the EC.

Membership in city European associations and networks

The interests of cities are represented at the EU level by dozens of associations, platforms and networks. Two categories can be distinguished: universal and sectoral. The former define their goals quite broadly – to represent the interests of cities. The largest and most influential organizations of these type are the Council of European Municipalities and Regions (CEMR) and EUROCITIES. The strength of these organizations lies in their high level of representativeness and prestige. They are members of expert groups at the EC and take part in public consultations. But they have been criticized for being slow and insufficiently effective in representing the cities' interests. With too many members and difficulty in establishing a common position, their actions are often late or ineffective.

In contrast, sectoral and thematic organizations focus more on functional interests than on territorial ones, which makes them more flexible and quicker to adapt to the expectations of the EU institutions. Organizational forms and structures are diverse and include associations, platforms, alliances and coalitions. Members of many of them include not only cities, but also regions, research centers, employers' organizations, businesses, NGOs. Such networks focused on a single issue are potentially more likely to effectively represent interests in a given sectoral policy.

The dominant trend today is to create functional coalitions rather than territorial ones, which foster cooperation between different stakeholders to solve specific problems, e.g., climate change, environmental pollution, sustainable transport. These include Energy Cities, Water Europe, European Forum for Urban Security, European Green Cities Network and many others. There are also numerous *ad hoc* coalitions that cease to exist once a common problem is solved. The main objective is to represent the interests of the cities before the EU institutions, exchange information, lobbying the EU institutions, sharing good practices.

Table no. 2. The examples of universal and sectoral European organisations representing interests of cities in the EU

Universal organisations	Goals of activity (year of foundation)	Profile	Members
The Council of European Municipalities and Regions (CEMR)	Influencing European policy and legislation in areas having an impact on municipalities and regions and providing a forum for debate between local and regional governments (1951)	European association of local and regional governments	60 member associations and 100,000 local governments in 41 countries
Eurocities	Representing interests of cities at EU level, monitoring and reporting back to cities the latest EU developments, funding opportunities and trends that affect them (1986)	Network of major European cities	145 of Europe's largest cities and more than 50 partner cities in 38 countries
Sectoral organisations	Goals of activity (year of foundation)	Profile	Members
Energy Cities	Actions for accelerating the Energy Transition (1990)	European network of cities	1000 local governments in 30 countries
Water Europe	Cooperation to improve the efficiency and competitiveness of the European water sector (2007)	Multistakeholder platform	226 members: cities, corporations, research and technology developers, NGOs, SMEs
European Forum for Urban Security	Cooperation and support among local and regional authorities in the field of crime prevention and urban security (1987)	European network of cities	250 cities and regions from 15 countries
European Green Cities Network	Actions for the development of green cities and buildings in a sustainable Europe (1998)	Non-profit organization	Municipalities, social housing organizations, institutions, companies, universities in 57 cities in 19 countries.

Source: Own study on the basis of websites of selected European organisations.

Europe's largest general city associations are CEMR and EUROCITIES. CEMR, founded in 1951, focuses on the representation of territorial interests in the traditional sense and is committed to defending the 'regional and local dimension of Europe', representing mainly medium and small sized cities from 41 European countries. Its primary objectives include influencing European policy and legislation in all areas, having an impact on municipalities and regions and providing a forum for debate between local and regional governments. It deals with more general issues of governance, economic, social and territorial cohesion.

EUROCITIES is also a territorial organization, but it takes more account of functional interests. It was founded in 1986 and currently associates 195 large and medium-sized cities in 38 European countries. The main objective is to represent the interests of large European cities in EU policies, to transfer knowledge between EU institutions and cities and to support

the implementation of projects. Key areas of interest include EU climate policy, transport, energy, environment, research and development. The organization is exclusive, as it brings together only big cities and enjoys the prestige of an elite club³⁶. The high prestige and exclusive character of EUROCITIES, its spectacular successes mean that it is perceived as an organization that plays an important role in shaping the European urban agenda.

In relations with the EU institutions, cities and their organizations can provide two types of access goods, which enable access to decision-making process: legitimacy and expert knowledge. The Commission that drafts legislation needs expertise which is often not available in its bureaucracy. It is therefore often dependent on external expertise³⁷. Cities and their associations can offer the Commission such expertise, and they act in this respect like other interest groups. Moreover, cities also play an important role in the implementation of EU legislation, so their practical experience is extremely valuable. Cities know not only what is technically feasible but also what is politically and socially acceptable.

Motivations and determinants of city lobbying at the EU level

Several approaches can be identified in attempts to explain the motivations and determinants of city lobbying at the EU level. Greenwood suggests that the most important factor is the level of autonomy of local authorities. National law strictly delimit the scope of cities' competences, which affects a city's ability to act more or less independently in the international forum. City representations in Brussels are either 'delegates' and have a specific narrow mandate obtained from governmental institutions, or they are 'agents' with a greater capacity to act at the EU level³⁸.

Callanan and Tatham point to two types of motivations for representing urban interests at the EU level: regulatory mobilization and financial

36 E. Charlton, *Trans-European access. The value of Eurocities to Gateshead Council*, June 2009, p. 14, available at [accessed: 28 III 2021]: <<https://research.ncl.ac.uk/jeanmonnet/download/Trans-EuropeanAccess-Report.pdf>>.

37 P. Bouwen, *Corporate lobbying in the European Union: the logic of access*, "Journal of European Public Policy" 2002, vol. 9(3), p. 369.

38 J. Greenwood, *Actors of the common interest? The Brussels offices of the regions*, "Journal of European Integration" 2011, vol. 33(4), pp. 448-450.

mobilization³⁹. The first one is characteristic for active, wealthy cities with a high level of independence that try to influence EU policies. The second is characteristic of cities seeking information and opportunities for financial support from EU funds. Regulatory mobilization tends toward a collective action, whereas financial mobilization tends toward an individual one.

A different approach is proposed by Wolffhardt, who emphasizes primarily local circumstances, including: economic and social context, institutional organization, the city's dependence on EU funds⁴⁰. On the one hand, these are the pull factors that mobilize cities to become active at the EU level. These are: the financial benefits of EU funds and the opportunity to build a city's identity ('Europe as a stage'), the chance to by-pass national institutions ('Europe as an alternative'), the opportunity to modernize ('Europe as problem solver'). On the other hand, these are push factors. These include: Europe as a threat – EU norms challenging established urban policies and Europe as a duty – reactive, incremental involvement – cities are confronted with European policies through domestic rules which assign them co-decision or implementation competences.

Considering the above, Wolffhardt identifies three different attitudes of cities towards the EU⁴¹. The first is 'Euro-Player' – this type of city is extremely ambitious and committed to creating an 'urban agenda' in EU policies. It is active both within European associations and it individually conducts lobbying in Brussels. The purpose of lobbying is to co-shape EU policies. Since the city's development is not dependent on the support from EU funds, it does not lobby for the funds. Examples include Manchester, Vienna and Hamburg. A different attitude is represented by 'Client cities', whose development is largely dependent on EU funds. Their lobbying strategies are mainly focused on EU funding opportunities. Their involvement both in European organizations and individually in Brussels is high, but their main goal is not to influence EU policies, but to obtain EU funds.

39 M. Callanan, M. Tatham, *Territorial interest representation...*, p. 188–210.

40 A. Wolffhardt, H. Bartik, R. Meegan, J. S. Dangschat, A. Hamedinger, *The European engagement of cities – Experiences, motivations and effects on local governance in Liverpool, Manchester, Vienna, Graz, Dortmund & Hamburg*, [in:] *European metropolitan governance. Cities in Europe...*, p. 65–111.

41 A. Wolffhardt, H. Bartik, R. Meegan, J. S. Dangschat, A. Hamedinger, *The European engagement of cities...*, p. 99–100.

Liverpool, Dortmund, Budapest are good examples. The third attitude is that of the 'Policy experimenter' – characteristic of a city that perceives the EU as a source of modernization. This type of city is ready to meet the requirements of EU funds only if they contribute to its modernization and accelerated innovations. These tend to be medium-sized cities and focused on specific problems (often green policies)⁴². Helsinki and Stockholm are mentioned as examples.

Conclusions

Due to the insufficient participation of cities in EU policy-making, cities have taken para-diplomacy measures and represent their interests at the EU level. Their strategies are aligned with the EU interests intermediation system and respect the requirements of the European lobbying arena. These are multilateral and bilateral actions. Although cities do not achieve as much influence on EU policies as regions, they take advantage of the opportunities offered by the EU's multi-level governance system and the EC's policy of openness, deliberation and inclusiveness.

Cities' lobbying strategies undergo a process of top-down as well as bottom-up Europeanization, and their relations with EU institutions undergo advanced institutionalization. Various forms of cooperation with the EC have emerged, which greatly facilitates the possibility of exerting influence in EU policies. The cities have developed two main channels of interests representation: permanent representations with direct lobbying in Brussels and participation in European associations and networking. The number of permanent delegations is steadily increasing, but their purposes and functions are diverse. The representations of medium-sized cities are distinguished by their activity on the European lobbying arena, while the representations of large cities are much less active. It can be assumed that in the first case, the objectives and motivations of lobbying are related to obtaining EU funds (financial mobilization) and occasional attempts to influence EU policies (regulatory mobilization), while in the second case, the representations focus mainly on collecting information and influencing the EU lawmaking process (regulatory mobilization). The former are

42 A. Wolffhardt, H. Bartik, R. Meegan, J. S. Dangschat, A. Hamedinger, *The European engagement of cities...*, p. 100.

referred to as 'Policy experimenters' or 'Client cities', the latter as 'Euro-players' (using Wolffhardt's terms) that participate in shaping EU policies. These conclusions on financial and regulatory mobilization coincide with the results of the Callanan and Tatham research on types subnational mobilization objectives⁴³.

There is a clear shift in the paradigm of interests representation from territorial to functional – cities are lobbying more for solutions to specific problems rather than representing general territorial interests. The result of this change is a rapid increase in the number of alliances of cities with business, universities, NGOs, which focus on specific problems e.g., environmental pollution, air quality. The new functional model of interests representation contributes to the effectiveness of cities' lobbying and to their growing importance in sectoral policies.

Although the number of cities' representations and their organizations are not very large in comparison with the huge population of business or NGO representations at the EU level, and the lobbying of cities in comparison with the activity of regions is not very visible, it may be expected that in the nearest future the role of cities in EU policies will significantly increase, just as it happened in the case of regions and regional policy. Hooghe and Marks point out that regions and their lobbying have changed regionalism. In the 1970s, regionalism was an internal phenomenon in European countries limited to the promotion of cultural diversity⁴⁴. Thanks to the involvement of regions at the transnational level, this has changed and today regional authorities co-shape regional policy. The same may be true of cities and the 'urban agenda'.

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43 M. Callanan, M. Tatham, *Territorial interest representation...*, p. 193–207.

44 L. Hooghe, G. Marks, *Multi-level governance and European integration*, Rowman & Littlefield Pub., Oxford 2001, p. 89.

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