The Influence of UK NGOs on the Common Agricultural Policy

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and

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I. Introduction

Following the 1992 agreement on the MacSharry reforms of the Common Agricultural Policy (CAP) of the European Union (EU), further CAP reform is a continuous element of current debate within and outside the Union. In Agenda 2000 (Commission, 1997), the Commission proposes ‘deepening and extending the 1992 reform through further shifts from price support to direct payments, and developing a coherent rural policy to accompany this process’. The pressures for further reform include:

- budgetary limitations, both overall and within the agricultural guideline which are linked to (slow) EU GDP growth;
- the difficulties (including budget cost) of extending the current CAP into central Europe as part of EU enlargement;
- the EU’s commitments under the GATT Uruguay Round, especially as regards subsidized agricultural exports, and the need to start a new set of farm trade talks in 1999;
• the reform of the EU Structural Funds, which include the Agricultural Fund’s Guidance Section.

Debate on these issues will as ever be dominated by the proposals of the European Commission and by interstate discussions within the decision-making Councils of Ministers. However, neither the Commission nor individual governments operate in a vacuum, taking a self-informed view of the balance of national and EU interests; all are heavily influenced by non-governmental interest groups represented within countries and at EU level.

There is a growing literature on the political processes of the EU, and of the role of NGOs within these processes (e.g. Wallace and Wallace, 1996; Edwards and Spence, 1994; Mazey and Richardson, 1993; Senior Nello, 1984, 1989), some focusing on the agricultural field. Hull (1993), as an EU official, mentions lobbyists arriving ‘in the guise of lawyers, public-relations firms, specialist consultancies, representatives of industrialist federations, representatives of companies or individual organizations, representatives of non-governmental organizations, and diplomats from non-Community countries’. It has been estimated (Pedler, 1994) that there are approximately 10,000 lobbyists in Brussels (excluding civil servants of Member State governments, officials of EU institutions who may lobby their opposite numbers, and diplomats from third countries) compared to a staff of 17,000 in the European Commission. The Commission (1996) lists 637 pan-European non-profit-making organizations with which it deals, 118 (19 per cent) of which are agriculture or food related. Of these 118, just over half are concerned with food products and processing, and a fifth with trade in agricultural and food products. In rough terms, one can estimate that around £100 million is spent annually on the salaries alone of agricultural NGO lobbyists.

It is the purpose of this article to discuss how UK NGOs attempt to influence the debate and outcome of CAP development at the current time. Since each country has its own political culture and structure, it is not to be expected that the UK is typical within the EU. Indeed, the position varies within Britain, depending on the regional strengths of producer, consumer and other groups in England, Wales, Scotland and Northern Ireland, each of which has some degree of independent policy action within the constraints of the CAP itself and of the overall UK role of the Ministry of Agriculture Fisheries and Food (MAFF). Moreover, at EU level, various official organizations – the European Parliament, the Economic and Social Committee, and the Committee of the Regions – act both as lobbyists themselves and as a target for lobbying by EU NGOs.

The remainder of this article describes the NGOs involved in the agricultural decision-making system of the EU, before the results of a small survey of UK NGOs are presented in Section III. Finally, we attempt to evaluate the key
determinants of influence by NGOs on the CAP and draw some conclusions on their influence in future developments.

II. Involvement of NGOs in the CAP

There are a number of different types of non-governmental organization that potentially have an interest in influencing the CAP: farming groups, food industry groups, consumer groups and, increasingly, environmental and rural development groups. The geographical remit of these groups varies. Some attempt to influence agricultural policy at European level, some within the UK and some within a specific part of the UK. Examples (by no means exhaustive) from a UK perspective are given in Table 1.

The most important agricultural NGO is COPA (Comité des Organisations Professionelles Agricoles), the transnational federation of 31 farming unions and

Table 1: Organizations with an Interest in the Common Agricultural Policy

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<tr>
<th>Transnational NGO</th>
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<tr>
<td>Farming</td>
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<td>MAFF</td>
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<td>COGEC</td>
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<td>Food and trade</td>
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<td>EDA</td>
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<td>Consumers</td>
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<td>Environment</td>
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<td>WWF</td>
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<td>BirdLife</td>
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<td>RSPB</td>
<td>RSPB(S)</td>
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<td>EU Network of Alliances</td>
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<td>SAFE Alliance</td>
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<td>Rural development</td>
<td>EURADA</td>
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Note: See text for explanations of the key acronyms.
associations, from all 15 Member States. It exists to put a unified producer view to the Community institutions, in particular to the Commission. Similarly COGECO (Comité Général de la Coopération Agricole de la Communauté Européenne) represents and defends the interests of agricultural co-operatives. COPA and COGECO work closely together, sharing a joint secretariat consisting of about 50 staff, and are the only European farming organizations officially recognized by the European Commission (Bureau de l’Agriculture Britannique, 1996). Between them, they provide half the membership of all the European Commission’s agricultural commodity committees (Senior Nello, 1989). Petit et al. (1987) state that COPA/COGECO ‘can be seen as the appropriate channels through which the Commission and the Council can test their proposals and obtain meaningful reactions’. However, COPA’s influence has declined as problems concerning agricultural surpluses and budgets have increased (Tracy, 1993).

The principal European consumers’ organization is BEUC (Bureau Européen des Unions de Consommateurs). BEUC submits opinions on agricultural and food policy, and has representatives on all committees which deal with consumer issues, including the advisory committees on foodstuffs, agricultural products and customs. However, BEUC has fewer formal and informal contacts with the Commission than COPA, and has complained of little influence on the Commission committees in which it participates (Senior Nello, 1989).

The food industry is represented in Brussels by the CIAA (Commission des Industries Agro-Alimentaires) – an association of national federations representing the food and drink industries of the EU – and numerous European-level associations of particular food and feed sectors. CIAA is represented on management and advisory committees on food legislation, free movement of goods within the EU, and consumer affairs, but its diversity of members impedes the establishment of common positions and encourages a sectoral approach. CIAA’s style of lobbying is described by Senior Nello (1989) as ‘much less open than that of COPA, taking place over the telephone and behind closed doors’. Other supranational interests include trade organizations such as COCERAL (the grain trade organization), EDA (European Dairy Association) and EMA (European Meat Association) and ETUC (European Trade Union Confederation).

The three main transnational environmental groups actively lobbying on agricultural policy are the World Wide Fund for Nature, the European Environmental Bureau (EEB) and BirdLife International. EEB has 150 membership organizations throughout the EU, and BirdLife over 1 million members. The three transnational networks sometimes act as a coalition, in the belief that a broader membership and geographical coverage increase their influence in
Brussels, and that only when acting in concert can they claim a strong presence in all 15 Member States.

For all these groups, attempting to influence the CAP is only one of several objectives. Membership organizations must also fulfil the expectations of their members at home, and many are keen to influence general public opinion, partly as an indirect means of affecting policy, but partly as an end in itself.

III. Survey of NGO Involvement

In order to discover real-world examples of NGO influence at work, a small survey of around 20 UK NGOs with an interest in the CAP was carried out by mail and telephone in late 1996. The aim was to discover the form of their involvement in CAP decision-making – who did they speak to, when and in what manner – and how effective they considered themselves to be in influencing the CAP.

The fairly high turnover of staff within the Commission (Mazey and Richardson, 1993) means that frequent contact is desirable. Contact varied from weekly meetings, with most groups claiming to meet the Commission monthly or bi-monthly, to once or twice each year for the smaller groups. The larger farming and commodity groups had the most frequent contact with the Commission due to their presence on Management and Advisory Committees. Meetings of these Committees have the added advantage of being funded by the Commission, and offering opportunities for parallel meetings with other members of European associations.

The NGOs varied in their views on the best timing for their input. Some considered that involvement at the pre-proposal stage was less effective than later in the decision-making process, whilst others felt the opposite. Those groups interested in introducing new policy elements tended to aim for early involvement in the process, preferably before a proposal had even been drafted by the Commission. Those more interested in adjustments to existing elements tended to seek involvement during the discussion of a proposal within the Commission or later in the Council.

A challenge to lobbying on European policy is the highly compartmentalized nature of the Commission, often with little co-ordination between the Directorates General, and considerable variation in their cultures and working methods (Mazey and Richardson, 1993). This sentiment was echoed by one of the respondents who described DG VI as ‘a bit of a fiefdom’, concluding that there is little point in lobbying DG XI and DG II as indirect means to influence DG VI. One environmental group commented that they have ‘good access … on general environmental matters. Our contacts with agriculture are more intermittent’.
However, it is also possible to make use of the (sometimes tense) relationships between the governmental actors involved. One example given was on agri-environmental policy, where the Commission was looking for an opportunity to improve control over the implementation of the policy within Member States, and hence encouraged lobbying by environmental NGOs for better monitoring to justify environmental benefits.

The groups with most frequent contact were also more likely to put forward ideas orally, rather than in writing. They were also more likely to target a range of levels within the Commission, rather than simply send a report to, for example, a Commissioner. The type of contact was primarily driven by the issue, but personal contacts, nationality and common language all helped. One respondent commented that you ‘need to know when to be critical, when conciliatory’.

Other forms of contact that were considered useful were attending conferences, inviting Commission officials to UK events, and using the press. An article in *Agra Europe* or the Brussels edition of the *Financial Times* was also considered potentially very influential. Some groups are considering greater future contact with Parliament, partly as its powers increase, but also because the Parliament is seen as a useful conduit for influencing the general climate of opinion – ‘setting the agenda’.

Judging how effective this activity by NGOs is at influencing policy is fairly subjective: as Whiteley and Winyard (1987) note, we do not have adequate means of measuring power and influence. They recommend obtaining participants’ own perceptions of their effectiveness, and in this survey, we asked NGOs how effective they considered themselves to be at influencing the CAP.

Overall, of the 20 or so groups surveyed, the main farming groups were the most positive about their effectiveness at influencing EU decision-making. UK NGOs such as the NFU have been particularly effective in terms of ‘technical’ policy influence, being able to engage in detailed discussions with MAFF and the Commission over apparently minor matters of detail, but less effective in terms of the general thrust of agricultural policy in Britain or the Community as a whole. The regional farming unions felt less effective, and relied more on working through national administrations (the Welsh, Scottish and Northern Irish Agriculture Departments). One commented that they are ‘only now exploring a proactive stance within Europe. The main barrier to greater activity is the cost of travel, especially from the peripheral regions of Europe’.

Most environmental groups felt themselves to be barely effective overall, though fairly effective on specific agri-environmental issues. Similarly, rural development interest groups considered themselves quite effective with respect to rural development policy, but not more generally on agriculture. Unfortunately there was little survey response from the food industry lobby, but EU-level
groups seem to have more impact on food legislation than on agricultural policy generally.

A further group who might be expected to form one or more NGOs the better to influence policy consists of academics and other researchers. They, after all, often proclaim their intention as just this, although other objectives, such as intellectual interest and methodological advance, are also relevant professionally. In practice, however, researchers do not appear to be active or successful in this way, perhaps due to their ‘capture’ by the policy institutions themselves. Several features may be observed:

- Most research is funded by government bodies, including the Commission, so that academics are not free to advance policy reform, or find difficulties in doing so, e.g. the delayed publication of the ‘Larsen report’ on CAP reform (Commission, 1994).
- Direct policy advice is not wanted by government institutions, who are more in search of information or of ex post assessment of past action, and prefer to keep the advisory role to themselves.
- Research is highly fragmented, so that there is no basis for building an organization.
- Individual academics tend to have several fields of interest (and have other responsibilities, such as teaching), so that their attention is easily and often diverted.

There do exist a few vehicles which might have been expected to result in at least a semi-organized voice from economic (and other) researchers. For example, national associations of agricultural economists might take up positions based on AGM votes. The European Commission’s Concerted Actions and other networking sponsorship might lead to efforts to exert policy influence. However, in practice, there are only a few ‘Memoranda’ or ‘Declarations’, e.g. Siena (1984) and Bertinoro (1996), and the more traditional academic route of writing books has been more popular, e.g. Shoard (1980) and Bowers and Cheshire (1983). This is certainly non-governmental but hardly organized.

IV. Key Determinants of NGO Effectiveness

*Familiarity* with the EU’s decision-making structure and processes is a prerequisite for effective lobbying in Brussels. This is partly in order that efforts can be appropriately timed – preferably in the formation stages, or even beforehand, so that the relevant officials are made aware of pressures – and partly because even powerful points can be stymied by a political or other blockage in the system.
While a permanent physical presence may not be necessary, since Commission officials are generally accustomed to dealing on the telephone or by fax (and increasingly by electronic mail), *location in Brussels* is a decided advantage. This is partly for convenience and flexibility in arranging and attending meetings, and partly in terms of the casual contacts which occur at third-party events. To this end, the Bureau de l’Agriculture Britannique (1996) has been established as a combined Brussels office of the three farming unions for England and Wales, Scotland and Northern Ireland.

A *co-ordinated or concerted approach* is becoming increasingly necessary in promoting or affecting EU-wide regulations and directives. Individual national NGOs are unlikely to be particularly effective since the position in other Member States must be ascertained by the Commission official. Increasingly, European officials prefer to work with ‘those European federations and national associations and organizations which are truly representative and which are really able to keep pace with and contribute to the EC policy process’ (Mazey and Richardson, 1993, p. 210).

How effective a transnational federation is at influencing policy depends partly on the diversity and relative strengths of its membership, which governs how difficult it is to reach a common position, especially when this must be done quickly in response to Commission proposals. Where a concerted approach is unlikely to be successful, the most effective UK groups have the flexibility and resources (both financial and know-how) to be able to lobby the Commission directly rather than through a European association. Also, a direct approach may be more appropriate where the issue largely affects the UK, such as how a policy is being implemented within the UK.

The UK environmental NGOs have an undoubted lead within their Euro-organizations. However, especially in the current political climate, there is a danger of the environment (especially the rural environment) being seen as too specifically a British interest. Green UK NGOs are therefore attempting to promote fellow-thinkers from other Member States within the Brussels circuits, and to influence non-British officials and politicians.

As regards rural development, there are few signs of European groupings except amongst academic networks formed either for specific research purposes or simply to exchange information. There are a number of development agencies and companies, but these may be confused or compounded with the Member States’ governments. Perhaps the most likely source of influence derives from the consultants who have appeared around the proliferating business of designing, assessing and monitoring regional proposals for structural funding.

The *provision of information* by NGO lobbyists is a critical component of their role. The officials or politicians they seek to influence may or may not agree with ‘pure’ arguments, but in any case it is easier to prepare a case, persuade
colleagues, or counter opposing views if reliable ‘hard’ information (preferably quantified data) is made available. In some cases, NGOs may simply be acting as a conduit for passing information well known to one part of the Commission (e.g. DG XI or XII) to another (DG VI).

The ‘traditional’ area of farm price support and the annual discussions over changes in their levels of intervention prices, etc., though now of much less importance than previously, offers an interesting case of this observation. The official farm business survey (RICA/FADN) provides reliable estimates of farming income levels by different types of farm. However, the output of this official system is always about 18 months behind current events, leaving much room for negotiation over the present situation and the potential impacts of future adjustments in support levels. To some extent, officials can make rough estimates of these features, but evidence – even if not statistically very reliable – from farming unions is useful negotiating material.

By contrast, some other aspects of the CAP – trade and agri-environmental issues, for example – have far less well-developed information sources and channels, and the information itself is inherently more complex than farm incomes for which several decades of farm accountancy have produced widely accepted methods. The environmental NGOs have been in the forefront of both data-gathering and data-summarizing (e.g. Tucker and Heath, 1994), placing themselves in the position of driving policy discussion, with officials and farmers having to accept or attack the data with no firm basis for doing so.

A further contrast is provided by the rural development debate, which is still embryonic in terms of structured information, with the OECD (1994) perhaps in the lead. The Commission has financed several studies of regional and rural development (e.g. Commission, 1988), but many are patchy, or too wide-ranging, to throw much light on specific policy issues. The NGOs in this area are too small and too varied to fill the gap, with the result that policy discussion on rural development is pursued in a rather disorganized way, often focusing on crude expenditure figures.

Future institutional changes will inevitably have an impact on the role of UK NGOs. Current discussions within the Commission about broadening the membership of many of the advisory committees within DG VI could open up the decision-making system to more consumer, environmental and rural development interests. Also, the strengthening of the European Parliament’s powers should encourage greater lobbying in that direction.

The extension of the CAP – no doubt in modified form – to central Europe in the next decade offers new challenges to existing Euro-groups and will open up new fields for lobbyists from that region. Indeed, some are already active, though mainly promoted by interested consultants rather than self-propelled. Polish farmers, for example, are not yet organized to direct energy and resources to
lobbying in Brussels, despite encouragement from their own government’s representatives in Brussels. COPA is active in encouraging contacts with central European farm unions, but cannot fully represent their interests, even if there were a consensus amongst the COPA members on how to do this.

In conclusion, we would expect decisions on the CAP to continue to be a key battleground for the interrelationships between the government and non-government organizations in the agricultural, environmental and rural development policy arenas. It is already widely perceived that agricultural interests – perhaps even more within the Commission and amongst national agricultural ministries than amongst the farming NGOs themselves — are eager to capture and retain as much of the environmental and rural development ground as possible. However, tighter budget constraints, combined with a broader policy agenda, will intensify the struggles over resources and responsibilities, with each party attempting to claim by rhetoric and subsidy as much ground as possible. Their successes and failures in this may be determined as much by the activities of lobbyists as by the internal bureaucratic and political forces within the Commission and Parliament.

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