

Can informal lobbying be responsible? Evidence from Brussels

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Abstract

Purpose – This study links the notion of responsible strategic communication to the field of lobbying at the European (EU) level. It provides empirical findings on the relevance of informal interaction and communication in EU public affairs (PA). Focusing on functional expectations and uses tied to informality from an actors' perspective, this study not only includes lobbyists and their attempts to gain influence on political actors but also attempts of lobbyists to control journalistic output through informal relationships and exchange mechanisms. The results are discussed with a view to further inform the concept of “responsible lobbying.”

Design/methodology/approach – Building on a theoretical background from strategic communication, informal politics and interest group research, findings from a qualitative content analysis of 43 semi-structured interviews with actors from PA ($n = 27$) and journalism ($n = 16$) at the EU level are reported, focusing on one policy case.

Findings – The study shows motives for establishing and using informality for both actor types. Functional expectations relate to a range of tasks at the core of the respective actors' day-to-day activities: monitoring political developments, pre-negotiating policy options in protected, confidential spaces with political decision-makers, receiving relevant sectoral background information and “technical coaching” on legislative dossiers directed to journalists.

Originality/value – Studies on lobbying have rarely been conducted from a strategic communications perspective, especially focusing the EU level. Albeit widely accepted, the understanding of lobbying and PA as an informal activity has not been scrutinized by academic research.

Keywords EU lobbying, Informal communication, Responsible lobbying, Strategic communication, Public affairs

Paper type Research paper

Introduction

The question of whether and how lobbying can effectively be carried out as a *responsible communication* practice has gained considerable attention in recent scientific research (Anastasiadis *et al.*, 2018; Barron and Skountridaki, 2022; Bauer, 2017; Bernhagen *et al.*, 2022; Favotto and Kollman, 2021; Ihlen *et al.*, 2022; Van den Broek, 2024). Following repeated lobbying scandals, this issue has also become a significant concern within the lobbying profession itself.

Lobbying is frequently associated with informal political actions that are opaque, largely invisible to the public and difficult for outsiders to trace and comprehend (Fröhlich, 2015; Lock and Davidson, 2024; Pagliari and Young, 2020). These attributes are particularly prominent at European (EU) level, where informality is described as engrained in the culture of decision-making (Mak and Van Tatenhove, 2006; Martins *et al.*, 2012; Wodak, 2009). In the EU lobbying context, informal contacts and long-term relationships are considered essential assets, and the abilities to network as well as to leverage these networks, form a core component of the Brussels lobbyist's expertise – not as an additional qualification but as a fundamental professional prerequisite. Consequently, informality is reported to be deliberately sought after, strategically produced and functionally utilized by lobbyists (Coen, 2010; Kuus, 2014; Van Schendelen, 2013).

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From a democratic theory perspective, informal ties between lobbyists and policymakers or journalists, respectively, may compromise transparency in political decision-making, inhibit public debate and lead to policy outcomes that favor certain interests over others. This stands in considerable contrast to the concept of *responsible lobbying*, which seeks to establish coherence between lobbying and corporate social responsibility (CSR) by developing policy positions that are informed by stakeholder concerns, aligned with societal values and objectives and focused on achieving balanced policy outcomes (Bauer, 2017, p. 109). The *processes dimension* of the responsible lobbying concept pertains to the methods, practices and mechanisms by which lobbying activities are carried out, emphasizing ethical conduct, transparency, accountability and adherence to democratic principles.

Scholars advocate for an enhanced theoretical synthesis that melds formal aspects of participation in the policy process with the informal dimensions of lobbying, including communication and trust (Heaney and Strickland, 2020). Yet, with few exceptions (e.g. Grose et al., 2022; Pagliari and Young, 2020), the functioning of lobbying as to an important extent informal communication activity has hardly been scrutinized by academic research to date. The objective of this paper is to address this gap and present evidence on the nature of informality in lobbying, specifically focusing on the functional expectations and uses that EU lobbying actors attribute to informality.

In the first part of this paper, a short review of the literature on EU lobbying and PA as well as on the conceptualization of informality in the political communication context is provided. This theoretical review then serves to guide a qualitative study that delineates the role of informality for EU PA actors in their relationships with policymakers and journalists, thereby also offering insights into motives behind EU policy journalists fostering informal relationships with lobbyists. These findings are discussed to achieve a more nuanced understanding of contemporary PA practices against the normative background of the concept of *responsible lobbying*.

Literature review

Lobbying as a communication process

In political sciences literature, lobbying is predominantly explained as an exchange of information by interest groups for access to policymakers (Bouwen, 2004) and deemed a “legislative subsidy” (Hall and Deardorff, 2006). Communication scholars have highlighted that lobbying is not merely about expertise but that the way the information is exchanged with policymakers matters, too (Milbrath, 1960). The communicative element in lobbying entails, among others, the use of influential rhetorical topoi (Ihlen and Raknes, 2022), dedicated argumentation (Lock and Davidson, 2024) as well as persuasive and discursive strategies (McGrath, 2007; Vercic and Vercic, 2012). Moreover, establishing a social communication setting that improves “mood, comfort, and allows for informal talk” (Grose et al., 2022, p. 369) is aimed at increasing policymakers’ receptiveness.

EU legislative procedures often escape media attention, which is attributed to the EU’s complex institutional setup that lacks media appeal (Wonka et al., 2018). While for the bulk of EU policy dossiers interest groups stay silent and concentrate their activities on political decision-makers (De Bruycker and Beyers, 2019), some findings are reported where EU interest groups are adopting media-centric tactics (Crepaz et al., 2022; Stevens and De Bruycker, 2020). For politically charged trade dossiers, Dür and Mateo (2024) show that citizen groups use the media whereas industry groups abstain from “going public.”

The advent of *digital PA* is impacting interest organizations, which need to adapt for media visibility and competitive policy engagement (Carro and Di Mario, 2022; Mellquist, 2023). Social media’s role in policy domains has expanded to include strategic access and content dissemination for influence and agenda-setting, agenda building and framing, despite the increasing complexity from more sources (Mykkänen, 2023). Online media’s traits enhance

engagement possibilities, allowing interest groups to foster relationships with stakeholders, mobilize and signal support and directly engage with policymakers (Figenschou and Fredheim, 2020; Stürmer *et al.*, 2023). These mechanisms are enhanced by AI-supported tools e.g. for legislative monitoring and evaluating relational capital (Bitonti, 2024).

As an increasingly important part of lobbying transitions into the digital sphere, the established dichotomy between *inside* and *outside lobbying* is becoming blurred. Direct engagements with lobbying targets through social media platforms are now strategically utilized both in a private manner and publicly (Trapp and Laursen, 2017). In *digital lobbying*, the inside dimension of lobbying, traditionally defined as direct engagement with policymakers (Weiler and Brändli, 2015), is now less distinguishable from the outside dimension (Kollman, 1998), where organized interests typically raise public awareness and exert indirect pressure on political decision-makers through protests or media campaigns.

For the purposes of this paper, which considers journalists to be an essential target group of lobbying efforts alongside policymakers, the more encompassing term PA shall be used as it highlights not only the relevance of the media but also the strategic communication aspect of lobbying and its fundamental relationship-building component (De Bruycker and McLoughlin, 2021; Helgesson, 2023; Von den Driesch and van der Wurff, 2016).

Informality and informal communication in EU policy contexts

Informality is a largely overlooked concept in contemporary strategic communication research (Hoffjann, 2024, p. 216). Policy research, in contrast, has established that informality, i.e. informal practices and corresponding rule-bound structures, is an essential component of political processes. Particularly in the context of relationships and negotiations between actors within the politico-administrative system, formal regulations, as legally established structures, are limited. Consequently, gaps within the formal political network are frequently bridged by informal communication relationships (Pannes, 2015, p. 141). Informality thus serves as a second, functional interaction and communication level by fostering more efficient and consensus-driven negotiations through its interpersonal and social quality, which helps to avoid public and partisan pressures. It occurs outside formal deliberation, typically preceding formal decision-making processes and encompassing non-public agreements and specific rules (Conover *et al.*, 2002; Eveland *et al.*, 2011; Mayntz, 1998).

“Informality cultures” (Pannes, 2022, pp. 173–176) emphasize stable, rule-governed patterns shaping interactions within policy fields, with advocacy coalitions (Sabatier, 1998) representing *collective informality*. These coalitions are recognized as significant mechanisms for influencing policy through the cooperation of like-minded interests and are particularly relevant in the EU context (Beyers and De Bruycker, 2018; Hanegraaff and Pritoni, 2019; Klüver, 2013). Coordination within lobbying coalitions often varies in terms of formality, publicity and openness (Heaney and Strickland, 2020).

Informal journalist–lobbyist relationships

The media portrayal of politics is shaped not only by media logic but also by the communication behavior of political and media elites. Researchers suggest revisiting the still understudied lobbyist–journalist dynamics in PA practice, where indirect influences play a crucial role (Arceneaux *et al.*, 2019; Dindler, 2015; Malling, 2023). Policy journalists and EU correspondents prioritize exclusive information but face economic limits, which drives them toward efficient sourcing (Martins *et al.*, 2012; Lorenz, 2017; Plavec, 2020). Lobbyist–journalist interactions may vary from formal press conferences to informal chats with anonymous sources (Davis, 2009; Maurer and Beiler, 2018) and, in the EU context, are reported by Schwinges *et al.* (2024) to involve off-stage exchange patterns that sometimes evolve into long-term partnerships, influence reporting dynamics and shape content before its

creation. Communication settings often exist outside official contexts, which encourages participants to transcend professional norms (Malling, 2023).

The *informal political communication culture*, as informed by Pfetsch (2003), Lesmeister (2008) as well as Baugut and Reinemann (2013), provides a theoretical framework for understanding the nuanced interactions between media and political elites, which can manifest in various forms, ranging from information exchanges to the creation of a shared culture based on mutual interpretive frames and interaction patterns. Informal political communication culture is conceptualized as the “empirically observable, reciprocal orientations of journalists and political actors that shape their non-public communication with each other” (Baugut and Reinemann, 2013, p. 40). As informality in the political realm presents itself not as a dichotomy but as a continuum ranging from binding regulations through informal bonds and unofficial agreements to entrenched expectations (Pannes, 2015, p. 41), the model of *informal political communication culture* can be categorized along the dimensions of closeness (versus distance), harmony (versus conflict), non-publicity (versus publicity) and closedness (versus responsiveness). While this model does not explicitly address interactions between journalists and PA actors, it serves, along with theoretical foundations from informal politics (Mayntz, 1998; Pannes, 2015) and advocacy coalitions (Sabatier, 1998), as one of the theoretical bases for this study.

The focus of this study presented here lies on the functional uses and expectations tied to informality, thus addressing the *processes* dimension as set out in the *responsible lobbying* concept. The research questions are formulated as follows:

- RQ1. What are the self-perceived functional uses and expectations EU PAA actors tie to informality?
- RQ2. What are the self-perceived functional uses and expectations EU policy journalists tie to informality with EU PA actors?

Method

As it is essential during the exploratory phase of investigating new or understudied concepts, a qualitative approach was adopted for this study (Daymon and Holloway, 2010).

Single case-study design

Inquiries into informality without focusing on a specific legislative case would have likely yielded superficial or socially desirable responses. Therefore, a single case-study approach was chosen to facilitate an in-depth understanding of the relevant social contexts (Flyvbjerg, 2004; Misoch, 2019). While incorporating a second case might have introduced confusion, concentrating on one EU policy file allowed for a detailed examination of informal behavior.

Following Tsoukas (2009), *analytical generalization* is employed, where insights from the single case are extended to a broader theoretical framework. This approach highlights the uniqueness of each case while identifying general patterns, rather than relying on statistical generalizability. Thus, the findings from this study can be applicable to other EU policy contexts.

To maximize informational utility, the case was selected based on its expected information content (Flyvbjerg, 2004, p. 128). Stringent selection criteria ensured the case’s positioning within EU regulatory policies, involving policy technocracy, diverse actor networks, lobbying coalitions and media coverage. The legislative procedure of the EU ILUC-Directive (Directive (EU) 2015/1513) was chosen (EU, 2015). This directive, addressing the indirect land-use change from biofuel crop cultivation, intersects EU climate, transport and energy policies (Di Lucia, 2013). During the interviews (March 2014–December 2015), the policy was under EU ordinary legislative procedure, provoking intense political controversy (Euractiv, 2012a, b, 2015; Levidow, 2013). The debate, termed a “war over ILUC” (Kupzok, 2020, p. 245),

extended from the policy sphere to EU and national media. The ILUC file thus classifies as an extreme case, providing rich information on underlying causes and ramifications rather than merely symptoms (Flyvbjerg, 2004, p. 127).

Semi-structured expert interviews

Expert interviews are widely used in qualitative research. According to Kruse (2014, p. 173), experts are identified by their role-based knowledge, claimed competence and societal recognition. With its focus on informality, this study seeks to transcend the emphasis on explicit expert knowledge on ILUC by highlighting the individual perspectives of experts on informality in EU PA, thus centering on interpretative insights, contextual knowledge of hard-to-access experiential areas and implicit knowledge (Helfferich, 2022, p. 887).

It was therefore decided to combine the *theory-generating expert interview* acknowledging the complexity of expert knowledge (Kruse, 2014, pp. 173–174) and the *problem-centered interview* emphasizing the individual perspectives of interviewees (Kruse, 2014, pp. 155–157), enabling an inductive, code-based and theory-generating analysis. The semi-structured interview guide was developed according to Helfferich (2022, pp. 881–885) and grounded in literature on informal politics (Mayntz, 1998; Pannes, 2015), advocacy coalitions (Sabatier, 1998) and informal political communication culture (Baugut and Reinemann, 2013). The interview guide was adapted to focus on the two central actor types in this study: *PA professionals* and *journalists*. Consequently, two slightly different versions of the interview guide were developed to address the specific roles and perspectives of each group.

Policy-relevant knowledge was crucial for accessing experts’ operational knowledge. Initial questions on ILUC negotiations facilitated relaxed discussions, enabling personal insights on informality. The interviews first sought to understand the dynamics and key players in the ILUC legislative process. Participants were then asked about their interactions with other stakeholders and policymakers and the forms and channels of communication used, communication settings, occasions and the strategic use of informality. The role of journalists in the ILUC file and the importance of interactions with them were examined. The interview guide in the version for PA actors is listed in Table 1 (follow-up questions in italics).

Theoretical sampling

Experts were selected using theoretical sampling (Glaser and Strauss, 1998, p. 53), which aims to develop the researcher’s theory rather than represent a population (Charmaz and Belgrave, 2012, p. 358). This approach thus seeks conceptual rather than statistical representativeness, aiming to comprehensively develop relevant theoretical concepts and categories.

Table 1. Interview guide (version for PA actors)

Questions

1. How do you assess the development of the ILUC negotiations?
2. Which actors cooperate on the ILUC file? With whom have you worked most closely? How would you describe these interactions?
3. Describe your exchanges with other actors. What forms and channels of communication do you use?
4. What role do journalists play in the ILUC file? Are you in regular contact with journalists? How important are these interactions for your lobbying efforts?
5. How crucial is networking in Brussels for your work? Are there specific codes of conduct or rules that apply?
6. Can you think of occasions for informal ILUC discussions? How does informal communication in Brussels work? How do you perceive “off the record” conversations with MEPs, EC representatives or journalists?

Source(s): Author’s own creation

Interview participants for this study needed to be actively involved in the ILUC dossier at the EU level, either as PA actors or journalists. Early cases were selected as sensitizing concepts (Blumer, 1954) based on theoretical and practical preconceptions (such as coalitions or dynamics between political actors and journalists), generating questions and investigative perspectives rather than hypotheses. The research began by analyzing submissions from a European Commission stakeholder consultation (EC, 2010) to identify the universe of active interest organizations (Kelle and Kluge, 2010, pp. 28–29). As part of the initial purposive research strategy, interviews were conducted with two policy officers from different EC Directorate Generals and the author participated in three relevant stakeholder events, helping to identify PA and journalistic actors covering the ILUC dossier.

The process was iterative, involving successive rounds of data collection, including snowball sampling (Audemard, 2020) and analysis to refine each phase (Charmaz and Belgrave, 2012, p. 347). When data confirmed theoretical concepts without unveiling new properties, the sampling strategy was adjusted (Strübing, 2021, pp. 34–35). Upon achieving theoretical saturation with homogeneous cases, the strategy shifted to maximal comparison, selecting cases likely to exhibit divergent manifestations, ensuring concept variations and identifying contextual conditions (Glaser and Strauss, 1998, p. 62). For the PA actors, the sample initially included representatives from industry associations, companies and nongovernmental organizations (NGOs). With an already deeper understanding of the relevant categories, PA consultants were later incorporated to capture diverse perspectives on informality within the PA profession. Within the group of sector associations and companies, various industries beyond biofuels, such as the food industry, were gradually included as their respective stakes in the dossier became evident. Journalists working for EU policy media were also added as their relevance emerged throughout the interviews.

Semi-structured expert interviews with PA actors ($n = 27$) and journalists ($n = 16$) were conducted over two phases, correlating with the ILUC Directive's legislative stages from October 2012 to October 2015, totaling 43 experts. Full anonymity was assured for all participants. The author conducted the interviews, averaging 50 min in duration. All interviews were recorded and transcribed verbatim. PA actors (from industry associations, companies, NGOs and PA consultancies) relevant in this study engaged primarily in lobbying and adjoining functions (e.g. policy communications) and came from the following organization types listed in Table 2.

Additionally, interviews were conducted with 16 journalists (from national and EU media) who reported on the legislative process of the ILUC Directive (Table 3).

The transcriptions first underwent multiple reviews to identify patterns and themes, which were written down in memos and subsequently ordered to identify links between categories. For the qualitative content analysis of the interviews, the content-structuring analysis according to Kuckartz (2018, pp. 147–150) proved to be the suitable methodological approach. A coding scheme was developed in a step-by-step procedure initially based on deductive categories from the literature (Kuckartz, 2018, p. 100). As the analysis involved iterations between the empirical data and existing theory and through revisions of the original codes and their interrelations, key topics could be identified. Emergent patterns on practices, functional expectations and uses of informal communication were inductively coded.

Findings

This study takes an actor-centric approach to scrutinize the relevance and functional uses of informality in EU PA, focusing on three core dimensions: the interactions between PA actors and journalists from EU and national media covering the ILUC legislative process; among different groups of PA actors lobbying on ILUC (e.g. between NGO and industry representatives) and between PA actors and political decision-makers. In this section, the results are presented.

Table 2. Interview partners from public affairs by organization type

Organization type	Position title
EU-level industry associations	Policy director Policy communications manager Policy executive Senior policy advisor Director Policy communications lead
National industry associations	Head of office Head of office Head of international affairs
Multinational industrial companies	Head of European external affairs Head of EU public affairs Head of EU affairs
NGOS	Policy expert Programme manager Head of office Senior policy officer Communications officer EU policy lead Policy officer Policy manager
Public affairs consultancies	Partner and CEO Manager energy Manager energy and climate Managing director Director of public affairs Consultant Senior account manager

Table 3. Interview partners from journalism by media type

Media type	Professional function
EU policy media	Freelance Brussels correspondent Brussels editor and co-founder EU correspondent EU correspondent Energy and environment reporter EU reporter Managing editor
News agencies	EU correspondent EU correspondent Senior EU energy and environment correspondent
National or regional daily newspapers	EU correspondent EU correspondent Freelance EU correspondent EU correspondent EU correspondent
National weekly newspaper	EU correspondent

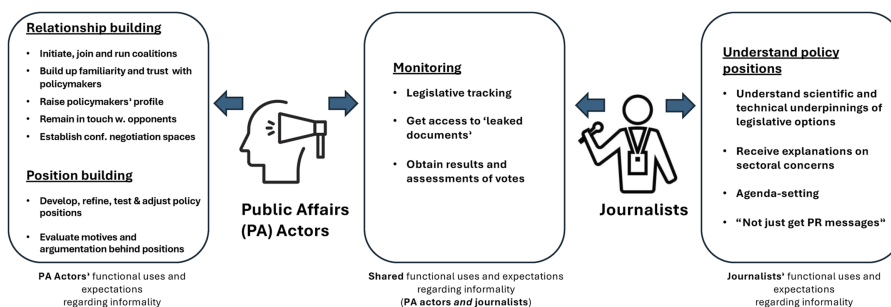
Source(s): Author's own creation

Figure 1 summarizes the findings for the two actor types, i.e. journalists (from national and EU media) and PA actors (from industry associations, companies, NGOs and PA consultancies). In the middle of the chart, functional uses regarding specific task-based areas shared by both actor types are shown. To the right and left, respectively, the type-specific functional uses are demonstrated. PA actors use informality for strategic actions in the realms of *relationship-building*, *position building* as well as *monitoring*. The latter is relevant also for journalists who additionally make use of informal exchange opportunities to gain a better *understanding* of policies, positions and procedural aspects of EU decision-making.

As follows, the more detailed results are presented with distinctions made between the respective actor types. The literature often suggests that NGOs may not employ the same practices in their advocacy efforts as industry lobbyists because the former tend to prioritize credibility (Lahusen, 2023, p. 220). On the other hand, it is reported that industry actors may be less active in addressing the media in their PA work (De Bruycker and Beyers, 2019). Moreover, as the literature emphasizes the differing roles of national and EU policy journalists (Plavec, 2020; Schwinges et al., 2024), the findings from these journalistic actor types are also addressed separately. Although no generalized conclusions can be drawn from these differences found for the ILUC file, the insights are considered instructive. A synthesis of the differences between actor types is provided in the discussion section.

Public affairs actors' shared functional uses and expectations regarding informality

Relationship building. Initiate, join and run lobbying coalitions: The main motivation for all types of PA actors to coordinate informally with other like-minded interest organizations is the rapid exchange of information, division of labor, shared political contacts and creating a strong voice. All types of PA actors, from NGOs, industry lobbyists to consultants, engage in cross-sectional coordination and cooperation with other stakeholders. A *non-public, informal lobbying coalition* could be identified with the cooperation between different EU-level and national NGOs from the climate, environment and human rights realms and the EU representations of two multinational food companies. These unequal partners are united by the same policy goal in the legislative process – albeit for very different motives: The food industry aims at limiting access to palm oil as raw material for other sectors, the NGOs aim at reducing the use of palm oil altogether. The cooperation is not made apparent at events. Outwardly, the expected distance between NGOs and industry is maintained. This non-public form of cooperation helps maintain a certain *marge de manoeuvre* while at the same time safeguarding credibility. This is particularly relevant for NGOs, as they usually have a membership sensitive to questions about the type of partners: certain stakeholders from business and industry are just not acceptable.



Source(s): Author's own creation

Figure 1. Functional uses and expectations regarding informality by actor types

Build familiarity and “comfort zones” with political decision-makers: A lobbyist from a multinational company speaks of a “*comfort zone*” that needs to be created around policymakers until concrete political demands can get through. A certain degree of familiarity through repeated interactions is necessary as a precursor to trust-building:

And people always underestimate, you know, how much time is needed. MEPs have so many visitors throughout the week. But if you are there and present, in meetings, but also at the stakeholder events, then on different trips, evening debates, and you participate, you know, in a sensible manner, they start to see that “ok, this guy might have some good ideas that we could also use”.

Policy-relevant information serves to establish the communication channel to the political addressee in the first place. Only stakeholders who, over time, have consistently and continuously proven themselves to be interlocutors of integrity, constructiveness and trustworthiness and who can provide relevant and valid information to political decision-makers at critical moments in or before the legislative process are granted access and are being ultimately trusted. Respondents’ answers show that this strategy applies to all types of PA actors interviewed.

Raise policymakers’ profiles: There are hints that especially PA actors from consultancies and industry help “their” target MEPs establish specialist knowledge and prestige, advocating for their consideration in key roles. Content-wise, lobbyists provide MEPs with insights into potential vulnerabilities in their policy stances, preparing them to respond adeptly in debates, counter arguments effectively and defend their positions robustly, explains a lobbyist from a PA consultancy:

And you know, it’s fun if it then helps to raise their [the MEPs’] profile and help them in their campaigning and their career. And, so, the main thing you need to do is to spend time with them.

Remain in touch with opponents: Even beyond the researched policy dossier, the findings from the interviews point to regular informal exchanges between the opposing sides, i.e. industry associations and NGOs. In the protected space of the *Brussels Bubble* and unburdened by the expectations of their own affiliates at the headquarters at home, it is easier to put aside one’s own ideologies and engage in *issue-based* exchange, even beyond well-rehearsed lines of conflict in the political field.

Establish safe spaces for policy exchange and pre-negotiations: Informal discussions offer freedom to exchange ideas, sense policy directions and pre-discuss justifications for policy options with decision-makers from the EU institutions. This is confirmed by all types of PA actors: confidential spaces are crucial for building or adjusting positions. As a newcomer to the *Brussels Bubble*, a biofuels company representative gains the insight that the informal negotiation level in Brussels must always be considered before a formal negotiation stage is entered:

You go to meetings and you think that the things will be decided there. Because it is written on the agenda that we will decide something. But in reality, most of the things have already been decided when the meeting starts. So, you need to do the work before the meetings.

Position building and adjustment. Develop, refine, test and adjust policy positions: Public interventions can pressure political figures, forming camps and making positions incompatible. In non- or semi-public, informal talks, lobbyists from all PA actor types get a sense of how far the acceptance for certain policy options can go and get the chance to show what they stand for and where their red lines are.

But the real negotiations are happening informally, because that is where you safety-based can say, “hey listen, this is our formal position, we would be willing to accept this and that”. You can’t say it publicly, because otherwise it becomes your new position. And then it’s your new position for which you have to compromise before you know it.

Confidential communication makes it easier to talk about concessions when political reality must be faced. This is also very naturally put forward by an NGO representative:

It's not our role to kind of give in, or compromise, I mean we are environmental NGOs! But sometimes you have the political reality, and of course it's then easier to discuss informally with people, just to also get a feeling of what's happening and kind of discuss a bit more the details, the nuances of the things. Because when you are in public events, you can only stay in the boundaries of what your organization stands for.

Evaluate motives and argumentation behind policy positions: Informal discussions offer insights into various sectors' motives, fostering understanding or highlighting sectoral concerns, as reported by all types of PA actors and illustrated by a representative from an industry association:

Why is informal communication important, it's because you can check your views and you will develop your ideas. And you will better understand others. I was only talking about our friendlies, but also the non-friendlies, I mean, sometimes, you have to talk to them, too, to understand them.

Common functional expectations and uses of informality by PA actors and journalists. Legislative tracking: Journalists and PA actors need to follow multiple legislative files, relying on informed contacts to stay updated.

Get access to "leaked documents": These documents act as "informal currency," providing critical early insights and enabling all PA actor types and journalists to serve as an early warning system. The significance of leaked documents lies not in their secrecy but in their strategic dissemination among select circles for preemptive evaluation.

Obtain results and assessments of votes: Informal relationships enable quick access to vote outcomes and assessments, aiding in forecasting and adapting, which is also essential for EU policy journalists:

Do you think I can read 200 amendments? No. So I have to rely on some people. [. . .] This is why these sources are of primary importance.

Functional expectations and uses of informality by journalists. Understand policy positions: EU legislative proposals and accompanying preparatory work are characterized by a high degree of technicality and complexity. With informal talks, PA actors of all types aim to explain complex issues to EU policy journalists, such as scientific models, calculations or legal justifications on which policy options are based. This allows them to frame policy options according to their needs and "feed" these frames to their target publics. A lobbyist from an industry association explains his understanding of this "friendship service":

So, they [the journalists] are happy to have somebody who can help them as we offer a place where they can have the right explanation. We are not trying to influence them, we are trying to give them an objective, realistic, I'd say factual explanation.

Journalists use informal exchanges with PA actors to grasp scientific and technical details. They justify the use of these sources because they want to cover all sides in the sense of balanced reporting. Even specialist journalists reach their limits in dealing with the ILUC science. A journalist from an Italian news agency points out:

That is the drama here in Brussels, we are not enough people to follow all the things that happen here. And, in particular, we are not enough to follow all the things that you need to follow with knowledge, with deep knowledge. Because you don't have the expertise for everything.

Lobbyist-journalist exchange patterns in the ILUC file can be traced particularly for journalists of EU policy media. In the ILUC dossier, journalists from EU media actively reach out to different PA actors, from NGOs and industry. A journalist from an EU media outlet specialized in energy policy reports to regularly initiate informal exchanges herself. However, she does that only with PA actors from whom she can expect "good" i.e. fact-based, correct and balanced information.

The personal relations with individuals are important, so I have certain individuals, who I think are good, regardless of their position in the debate, and I don't care if they support industry or NGOs, but the point is that I feel they have a fair perspective – they are not just feeding me, they are not just saying we should ban all biofuels.

Agenda-setting: Journalists use informal exchanges to identify topics; this is a function especially also put forward by national correspondents interviewed.

The topics, you hear almost all of them informally, and then you say “oh right, that topic, I have to care about that too”.

An EU journalist makes clear that he came across the ILUC topic through an NGO coalition:

The fact that these guys, a woman actually, reached out to me, and talked to me about this topic, made me understand this topic better and realize that it's an interesting story. So, she put it on the agenda for me, so to say.

Not just get PR messages: Journalists from national and EU media seek real viewpoints to enrich their reportage beyond PR messages, as an EU policy journalist explains for her work on the ILUC file:

So, the debate is one thing, but afterwards, and I try and be a part of that, people go and catch up on what's really going on, because what they say publicly is not also necessarily what they believe privately [. . .] So that's always very interesting when you hear what people really think. Because it's more realistic and obvious. It helps me understand their position.

Concluding discussion

This study provides initial insights into the functional use of informality in lobbying and PA. By integrating empirical findings with theoretical insights, it lays the groundwork for more comprehensive and actionable frameworks that can guide ethical and effective lobbying practices in EU PA. In this final part, the main findings will be summarized and the theoretical contributions of the study will be clarified. Following this, practical implications will be discussed.

For all actor groups in the PA profession, from NGOs to industry lobbyists and PA consultants, informal practices are relevant in the ILUC case, though nuanced differences exist: Throughout the ILUC negotiations, findings show that industry representatives from associations and companies primarily use informality to build lobbying coalitions, create confidential “comfort zones” for managing sensitive information and gain strategic influence with policymakers. They leverage informal interactions to cultivate long-term relationships and trust with decision-makers through repeated engagements. The findings also point to the fact that while industry lobbyists seek less influence through the media as indicated in the literature (Dür and Matteo, 2024), this influence still occurs. Industry actors strategically target specific journalists, often from EU policy media and provide technical coaching when they anticipate that their efforts will likely be well-received.

What is striking about the findings is that NGO actors, for their part, equally utilize informality to actively build cross-sector coalitions, in the ILUC case even with unlikely industry partners for shared policy goals (Beyers and De Bruycker, 2018). Moreover, NGOs use informal channels to gauge political realities and discuss potential concessions privately, enabling them to balance ideological positions favored by their members with practical policymaking. This aspect has, to the author's knowledge, not been thematized in the literature, where NGOs are often characterized as putting forward “pure” policy positions which are fully in accordance with their membership's convictions in order to safeguard credibility. The findings show that the “political realities” also force NGOs to adapt positions in a pragmatic manner and that they use informality as a communicative space to prepare these adjustments and to explore political possibilities.

The study also brings about some new insights about the understudied group of consultants from PA agencies (O'Leary, 2020). These engage in strategic communication using informality, focusing on fostering personal trust and familiarity with both policymakers and journalists. They play a crucial, enabling role in creating informal networks for their clients and in facilitating consistent, off-the-record exchanges about the ongoing ILUC legislative procedure, keeping clients ahead in the policy process. It can be concluded for this group that they fulfill the role of policy communication brokers in line with Sabatier (1998).

For PA actors' media work on ILUC, the findings hint at strategies targeting especially EU transnational policy media (e.g. Euractiv, Politico and EU Observer), which are an important news source for EU decision-makers. EU media journalists prioritize building personal relationships with PA actors who provide insights about votes and decisions and accurate explanations of complex policies as well as relevant background information on procedures and negotiations among political groups, allowing them to effectively cover a broader range of EU legislative processes and maintain expertise in specialized policy areas, confirming corresponding evidence from Plavec (2020) and Schwinges *et al.* (2024). Journalists from EU transnational policy media even actively initiate informal exchanges with PA actors from NGOs and industry to obtain sector-specific information and explanation, which also helps them understand stakeholders' underlying motivations.

National policy journalists or correspondents, for their account, seem to be more reluctant in initiating interactions with PA actors. As they also often depend on informal networks for swift access to vote results, assessments of political agreements and insider knowledge essential for timely reporting, they do use informal contacts though, also from PA actors from the industry side. With these informal contacts and interaction they try to enrich their stories with firsthand evaluations.

Limitations

This study's findings are limited by its single case-study approach focusing only on the ILUC legislative process. Further research is needed across diverse policy areas and institutional settings to validate these findings. Including policymakers in future studies and digital PA practices could offer a more comprehensive understanding of informal communication's impact not only on PA and lobbying practices but also on policymaking processes.

Theoretical implications

In line with Raupp (2020), this study highlights that the term "public" has a multifaceted connotation in lobbying practices. Interview findings indicate a significant connection between informality and semi-or non-public interactions. While not all informal interactions are non-public, findings show that informality in the ILUC case is pronounced within small or semi-public spheres. For the ILUC case, it can be shown that technocratic EU policymaking clearly encourages the emergence of expertise- and policy-centered semi-publics. Policy knowledge demarcates these semi-publics, fostering internal cohesion and self-organization (Donges, 2023). Participation presupposes specialized knowledge, limiting the audience and leading to homogeneity among participants, with informal lobbying spanning from confidential exchanges to semi-public expert discussions.

It becomes evident that these semi-publics intersect with the *Brussels Bubble* as an often-cited example of a geographically clustered political power center where decision-makers, lobbyists, journalists and other relevant players with similar policy specializations meet frequently (Busby, 2013). Actors involved in the ILUC dossier often cross paths, building groups around common issues in the legislative process. This shared context shapes daily routines, creating and fostering shared orientations and collaborative problem-solving in relative isolation.

The findings show that informality is not merely a peripheral aspect but a core element of political communication culture in EU PA on ILUC. As it could be shown that the model of

informal political communication culture (Baugut and Reinemann, 2013), traditionally applied to journalist–politician dynamics, can be expanded to include PA actors, exploring how semi-publics form professional norms and collaborative approaches, the presented findings enrich this existing theoretical framework.

Practical implications

The findings raise questions regarding the compatibility between functional informality and responsible PA. Informal information exchanges for monitoring purposes appear less problematic compared to covert coalitions, exclusive communication channels with policymakers or informal exchanges with journalists. All these practices can sway policy debates and public perceptions negatively. While informality can increase adaptability, its lack of transparency can undermine trust and enable power manipulation, conflicting with responsible lobbying and CSR (Anastasiadis *et al.*, 2018). Non-transparent, informal collaboration among policy actors can obscure the decision-making process, fostering public distrust and disproportionately marginalizing less powerful stakeholders, thereby exacerbating biases and favoritism. For lobbyist–journalist relations, the study underscores the need for policy journalists to rigorously verify the evidence supporting policy positions and ensure balanced reporting that reflects diverse stakeholder perspectives. The limited time and personnel capacities of EU correspondents and journalists from transnational media in Brussels stand in opposition to this goal.

Given the increasing expectation for companies and organizations to address societal issues, incorporating stakeholder concerns is crucial for maintaining long-term reputation and legitimacy. PA professionals should proactively engage stakeholders and maintain transparency through clear communication. Ensuring factual and democratic legitimacy in policy positions requires commitment to reliable information, stakeholder surveys and verifiable scientific evidence. A responsible and holistic strategy includes integrating PA with broader stakeholder communication functions and voluntarily exceeding formal transparency rules, such as disclosing meetings with policymakers and journalists and making all conveyed content transparent.

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