Interest Groups' Access to the European Commission

An Analysis of Internal Factors Using fsQCA

Master Thesis by Desiree van de Kerkhof 546264

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Erasmus University Rotterdam

First Reader: Prof. Dr. Markus Haverland

Second Reader: Dr. Asya Pisarevskaya

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Summary

Interest representation has been a part of the European Union policy-making process since its foundation. The role of interest groups within the system is a much-debated topic. Interest groups need access to the policy-makers to be able to present their information and preferences. This thesis researches which combination of internal factors of the interest groups in the insurance sector are necessary and/or sufficient to obtain access to the European Commission. Five important factors are chosen to research using the fsQCA method: Europeanness, organizational age, financial resources, functional differentiation and membership. The results show that Europeanness and organizational age are of relatively little importance when obtaining access. The combination of financial resources and membership is sufficient for obtaining access. The factor functional differentiation falls in between. None of the researched factors are found to be necessary, although financial resources scores relatively high on necessity and can therefore be concluded to be the most necessary out of the five factors. These findings can help interest groups to adjust their strategies when trying to access the European Commission and present their knowledge and expertise. By allowing on the ground knowledge and expertise to reach the policy-makers in the EU, new policies are better supported throughout society and result in a better functioning of the financial services in the EU. Having more insights into gaining access to the policy-makers is therefore important for interest groups and the representation of the EU's societal interests.

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Contents

List of Tables

List of Figures

1. Introduction

In any democratic political system, entities exist to represent interests of certain groups within society and the economy. An institution as large as the European Union (EU) creates policies and regulations for many people and businesses. Any policy the EU adopts, affects large portions of European society and beyond. It is therefore no surprise that from the establishment of the EU on, interest representation has been a central part of the policy-making process. In addition to the democratically chosen European Parliament (EP), interest groups also represent the interests of society. They are active in Brussels and communicate with policy-makers and the EU's bureaucracy to represent their constituencies' interests. Especially in the EU, it is important that interest groups share their knowledge about the market and civil society with the policy-makers. This is because the EU's bureaucracy is relatively small compared to that of a national bureaucracy (Klüver, 2012, p. 493). The EU does not have the resources to research every topic in detail. Interest groups can help to fill this gap of knowledge and expertise. Simultaneously, the involvement of interest groups in the policy-making process presents them with the opportunity to try to influence the policy toward their preference. Over the years this has created both a societal and academic debate about interest groups and their role within the system.

Within the academic debate various aspects of interest representation in the EU can be encountered. One aspect that is debated is how interest groups actually influence policies. A subfield of researching interest groups' influence, is *accessing* the policy-makers, which is the focus of this thesis. The process of representing interests entails many real-time factors that can affect the actual influencing of policy-making. For example, the salience of an issue, the status quo that exists around an issue, the people involved in making policy and their relationship to each other. These and many more factors affect the success of interest groups attaining their goals. The subfield of accessing the policy-makers is one of those factors. If an interest group has easy access to the right policy-makers, the chances of influencing the policy toward their preference increases. Therefore, it is interesting to see what factors are at play when trying to access policy-makers in the EU.

An interesting case to research for obtaining access is the insurance sector, which is an important part of the provision of financial services in the EU. The EU has aimed for an integrated financial system across Member States for a long time. Already at the creation of

the Economic and Monetary Union (EMU), there was criticism about the EMU's inflexibility and struggles of authority. The development of rules and procedures regarding financial services have been developing slowly (Bouwen, 2004). However, these are a fundamental part of a well-functioning financial services market. Resulting from the EU's aim toward an integrated financial services market is the active involvement from interest groups. For example, in 2020 the European Commission (hereafter referred to as 'Commission') started a review process of the Solvency II Directive, an essential Directive for the insurance sector in the EU. The European Insurance and Occupational Pensions Authority (EIOPA), an institution created by the EU in 2011, advises the Commission. In light of the reviewing of Solvency II, EIOPA proposed adjustments in December 2020 (EIOPA, 2020). However, the interest groups were quick to answer with their own advice. Insurance Europe, the overarching interest group concerning insurance, voiced its discontent with the advice from EIOPA. Insurance Europe claimed: 'the advice would result in a less competitive European insurance industry … and offer lower returns to customers' (Financial Times, 2020). Information and advice are thus exchanged between the Commission and EIOPA on the one hand, and the interest groups on the other hand. The integration of the financial services market is far from finalized. Policies and regulation regarding these services are under constant change. Incorporating extensive knowledge and expertise from the interest groups into the policy-making process in the financial services field is necessary to ensure changes made are constructive for the development of the sector and the Union as a whole.

1.1 Problem Statement, Research Question and Relevance

1.1.1 Problem Statement and Research Question

It is thus important for the further development of the EMU and the legislation concerning financial services to fit well into the system and improve the EU's strength as a block, rather than hurting it. On the ground knowledge and market expertise needs to be able to reach the policy-makers to ensure well-designed policies. Having *access* to the policy-makers is an undeniable precondition of being able to represent interests to the policy-makers. The research question of this thesis therefore is: '*What combination of factors are necessary and/or sufficient for obtaining access to the European Commission by interest groups in the insurance sector?*'

1.1.2 Theoretical Relevance

This thesis aims to add to the academic subfield of interest groups accessing policy-makers. It uses a relatively new method in social sciences. This thesis uses the fuzzy set Qualitative Comparative Analysis (fsQCA) method, a relatively new method in social sciences that is able to include many of the factors that can influence the interest groups' access to EU policy-makers. Strengths of both quantitative and qualitative research are combined, and new insights may come to light. Furthermore, this thesis uses several indicators that can measure access. As is discussed later, these indicators have strengths and weaknesses. By exploring the measurement of access, this thesis adds to the academic debate by showing some of the limitations of how access is measured.

1.1.3 Societal Relevance

Good legislation on financial services is not only important for the development of the EU as an institution, but also for society. A well-functioning insurance market increases the financial stability of households and firms (Das, Davies, & Podpiera, 2003). Everyday risks are transferred from the individual to the insurance company, which protects them from significant costs if something happens (ECB, 2009). This creates financial stability for households, which in turn supports economic growth. The positive effect of the insurance market on financial stability of nations and households has been empirically proven (Das, Davies, & Podpiera, 2003). Integrating the financial services systems of the 27 Member States of the EU is a challenge. New legislation must be executable in all 27 systems. It is therefore no surprise that Europe's insurance sector has been actively through various interest groups trying to influence policy outcomes issued by the EU. Having more insights into gaining access to the policy-makers is therefore important for interest groups and the representation of the EU's societal interests.

1.2 Thesis Outline

This thesis is further structured as follows: first a literature review of the most important literature in the debate on interest representation and access is presented. Next, the theoretical framework explains the main concepts the thesis researches, after which the research design

explains the chosen method and operationalizes the variables. Subsequently, the results are shown and an analysis of the research are presented. Lastly, the discussion and conclusion answer the research question and discuss the results, including an explanation of limitations to this research and suggestions for further research.

2. Literature Review

This chapter sets out the literature concerning the topic of interest groups at the EU and their aim to access the policy-makers. First the theories on interest representation are discussed, whereafter the focus shifts to external and internal factors that are faced by an interest group when trying to access policy-makers in the EU.

2.1 Interest Representation in the EU and Influence

Most political systems try to maximize the input from all types of interests before making a political decision to decrease the chance of protest from society (Koeppl, 2000, p. 70). Interest groups satisfy this demand for input, but simultaneously see the chance to influence the political decisions into the direction they see fit (Koeppl, 2000, p. 70). Due to the ever-increasing global interconnectedness, many businesses have become multinationals, which resulted in a changing relationship between businesses and their government (Hix & Hoyland, 2011, p. 179). This also happened in the EU. The Single Market policy affected many fields of business, markets were integrated, and rules and regulations formed that needed to be applied in all Member States. This inevitably led to national business interests looking towards the EU institutions to represent their interests (Hix & Hoyland, 2011, p. 179). Furthermore, an incentive for businesses to start lobbying their interests on the European level is that by only having to lobby one institution, information and communication costs decreased (Hix & Hoyland, 2011, p. 179). European businesses with similar interests started lobbying together, creating sizable interest groups. In addition to this supply of interest representation, the EU institutions are forced to demand information from interest groups, as they do not have the administrative capacity to create its own expertise in

all policy areas (Koeppl, 2000, p. 74). Therefore, the interest groups' extensive, on the ground knowledge is necessary for the EU institutions to make thought through decisions.

The importance of interest groups in the policy-making process has long been a topic of debate, especially surrounding the question of how interest groups gain power and with that influence policy outcomes (Dür & De Bièvre, 2007). In order to have the ability to influence policy, interest groups need access to the policy-makers in the first place (Rasmussen & Gross, 2015, p. 346). It is therefore no surprise that the concept of access to policy-makers has become a well-researched subfield of interest groups' influence. The next section shifts the focus of influencing policy per se to the theoretical and empirically researched factors that have an impact on an interest groups' access to policy-makers.

2.2 External and Internal Factors Affecting Access

2.2.1 External Factors

One essential factor to influence policy is obtaining and maintaining access to the policy-makers. Bouwen (2002) describes that, as the EU is a complexity of institutions, there are many channels through which to access policy-makers and influence their decisions (p. 365). Bouwen's (2002) theory of supply and demand for access goods further explains that businesses have information that they can supply to EU policy-makers in exchange for access (p. 365). Both parties needing each other, creates a resource dependency (Bouwen, 2002, p. 368). This resource dependency is therefore a partially external factor that influences an interest groups' abilities to gain access to the EU policy-makers.

The complexity of EU institutions makes it important for interest groups seeking to gain access, to consider who they are trying to access. This paragraph briefly discusses the EU's three main institutions involved in policy-making: the Commission, the EP and the Council. Each of these three institutions can be accessed through different channels. Legislation that is being made goes through these through institutions. The institutional system of the EU policy-making process is therefore an external factor interest groups encounter when accessing the policy-makers.

Firstly, the Commission has the right of initiative, meaning they can initiate and draft new policies, which makes it one of the most important EU institutions for interest groups to lobby. The Commission has for a long time actively welcomed interest groups' lobbying activities as it knows it is dependent on the information interest groups provide (Koeppl, 2000, p. 74, 75). It is written in the Amsterdam Treaty that the Commission must consult widely before proposing legislation, making the Commission also the principal supplier of access to policy-makers (Hix & Hoyland, 2011, p. 182). As Koeppl (2000) also notes, the civil servants working for the Commission are aware that the interest groups are trying to influence them, but they accept this because of the valuable information interest groups provide (p. 79). This is in line with what Bouwen (2004) writes. He says that interest groups can create three types of access goods: expert information, information about actors on the EU level and information about actors on the domestic level (Bouwen, 2004, p. 340). According to Bouwen (2004), the Commission is mostly in need for the first access good, expert knowledge, due to its role as legislation initiator and therefore needs to be able to make legislation that is based on facts.

Secondly, regarding the EP, a shift can be seen when the EP's power increased with the Lisbon Treaty. With more power, the EP's demand for expertise increased, making the EP also an institution to lobby (Hix & Hoyland, 2011, p. 183). Returning to Bouwen (2004), the EP is mostly in need of information about actors on the EU level. The EP does not make legislation but is tasked to evaluate the Commission's proposals (Bouwen, 2004, p. 345). Therefore, information about the interests of actors on the EU level is more valuable than expert knowledge to the EP and is the access good interest groups can focus on when trying to access the members of the EP (Bouwen, 2004, p. 345).

Lastly, the Council can also be a target for interest groups to try to influence. The Council is less accessible than the Commission and the EP, partly due to the fact that for every policy area the members of the Council change and there is not one person per country to focus attention on. Despite this, as Panke (2012) notes, the Council can be indirectly lobbied through the Council's President, the person that chairs the meetings and sets the agenda (p. 131). The Council is mostly in need of information about actors on the domestic level (Bouwen, 2004, p. 340). The Council works intergovernmental, and its task is to approve legislation. Rather obviously, the individual Ministers on the Council will want to approve legislation that improves or at least does not hurt their national interests (Bouwen,

2004, p. 347). Therefore, interest groups seeking access to the Council will need to provide them with information on domestic level actors and their interests (Bouwen, 2004, p. 347).

Klüver, Braun & Beyers (2015) address several other external factors that can influence an interest groups' access. First, if a policy issue is highly (technically) complex, the EU legislators need more expertise on the topic from interest groups to be able to make legislative proposals that are technically accurate (Klüver et al., 2015, p. 451). Combined with Bouwen's (2002) access theory, one can expect policy areas which are technically complex to create more access for interest groups than policy areas in which the policy-makers are less dependent on external information. This ties into the second factor Klüver et al. (2015) bring forward, that is the policy type, differentiating between redistributive policies and regulatory policies (p. 451). Redistributive policies concern redistributing resources from one group to another, implying the need for political information about all parties' preferences is needed more so than expertise (Klüver et al., 2015, p. 451). Regulatory policies on the other hand concern standards in a certain policy area (Klüver et al., 2015, p. 451). Thus, the policy type also influences an interest groups' access. Next, Klüver et al. (2015) argue that the salience of an issue influences interest groups. They argue that if an issue gains a lot of public attention, which could contribute to or hurt the (re-)election of a public official, this influences the interest groups' chance to gain access to that official (p. 452).

2.2.2 Internal Factors

Many organizational factors within interest groups can affect their ability to properly convey their message and assemble the right information. The next section shifts the focus from the external, institutional factors shaping interest groups' access, to internal factors surrounding the interest groups themselves that influence their access. First, Eising (2007) argues in addition to the institutional context described above, that there are three important factors that can influence interest groups' access to EU policy-makers: resource dependencies, interest group organization and strategic choices (p. 329). Resource dependency refers to the fact that a mutual dependency exists between the interest groups and the EU institutions as also argued by Bouwen (2002) explained above. This makes it a mix of internal and external factors. It is internal to interest groups to the extent that they control the knowledge and expertise that they have and can offer this as an access good to the policy-makers. The external side of the resource dependency is that the policy-makers have the power to accept the access goods

from one interest group or another. Next, with interest group organization, Eising (2007) refers to their financial resources, as he found that increasing the budget raises the probability of having contact with the Commission (p. 354). Lastly, strategic choices refers to an interest groups' focus on insider or outsider strategies. Insider strategies means influencing information within the EU bureaucracy and outsider strategies refers to mostly using the media to influence a certain topic (Eising, 2007, p. 355).

Moreover, an interest groups' decision-making structure can influence the substance of the information they supply and therefore their access (Albareda & Braun, 2019). As Binderkrantz (2009) found, an interest groups' leadership making decisions as opposed to active involvement of its members in the decisions it makes, can constrain the leaders to make decisions not based on the interest represented by its members (p. 676). A fundamental part of an interest groups' decision-making structure is the way there is unity or fragmentation on the final decision being made. Albareda & Braun (2019) find that amongst others, qualified majority and procedures that increase consensus decision-making are features that can help interest groups gain access to administrative and political officials (p. 468). This is thus an argument about having more interests represented increase the chance of an interest group having access. This argument can be combined with Junk's (2018) research. Junk (2018) finds that 'umbrella' organizations enjoy higher legislative access (p. 313). With umbrella organizations, Junk (2018) refers to organizations that have other organizations as their members. The underlying argument, an organization representing many interests through their membership or decision-making structure increases the access, is thus similar. So, theoretically, policy-makers give access to those organizations that signal that they have a broad constituency and that the constituency they have, has a voice within the organization. This signals to the policy-makers that the information this interest group provides is widely supported among the constituency which makes it valuable to the policy-makers.

Furthermore, it has been found that financial resources, in capital or staff form, play an essential role in providing information to decision-makers and therefore their access to policy-makers (Eising, 2007; Klüver, 2012; Rasmussen & Gross, 2015; Schmitter & Streeck, 1999). Regarding the staff form of the resources, this variable can be divided into three subcategories that together affect the interest groups' staff. First, the organizational design, referring to how staff is divided between departments, affects the information they supply (Klüver, 2012). An interest group that has a clear division between, for example, legal,

economic and technical aspects of the policy area in which they are involved, is more likely to produce expert information in that specific area (Klüver, 2012). This expert information is needed by the policy-makers and therefore, being able to create valuable and structured information increases the chance to gain access to the policy-makers (Klüver, 2012). Moreover, if the structure of positions and duties divided amongst those positions within a department mirror the policy-makers' structure, one increases its chance to get access to the crucial policy-maker (Klüver, 2012). Albareda & Braun (2019) also acknowledge the importance of functional differentiation as it affects the way information is collected from the constituency and translated to the policy-makers (p. 471). Second, Klüver (2012) researched decentralization of autonomy as a feature of organizational structure that influences an interest groups' access to policy-makers. She found that by decentralizing decision-making power, an interest groups' officials that are close to the issues can make swift decisions and so adapt quickly to an ever-altering environment of policy-making (Klüver, 2012, p. 502). The third subcategory of organizational structure that Klüver (2012) researched is professionalization of staff. An interest groups' staff is considered highly professional if the staff is highly educated and has professional experience in the area (Klüver, 2012, p. 496). Klüver (2012) found that a more professional staff increases an interest groups' information supply to the policy-makers (p. 502). The three subcategories taken together are a systematic way of looking at the staff section of an interest groups' organizational structure. Klüver (2012) found all her hypotheses concerning these three aspects of an interest groups' organizational design to be positive. More decentralization of decision-making, more functional differentiation and more professional staff all contribute to an interest group's information supply to the Commission (Klüver, 2012).

However, Saz-Carranza & Ospina (2010) point out, issues can also arise from having a fragmented internal structure, which they describe as the unity-diversity tension (331). While unity refers to being able to speak with one voice as an organization, diversity refers to the variety in structural and institutional features (Saz-Carranza & Ospina, 2010, p. 332). Tension between the two arises when different departments might begin to argue against each other and is not steered in one direction. This could decrease an interest groups' chance to influence EU policy-makers, as Rasmussen (2014) has argued.

Next, Bouwen (2004) found the importance of interest group's level organizational design in his case study on the financial services lobby at the EU (p. 359). As opposed to

Klüver's definition of organizational design, Bouwen (2004) uses the term to refer to the level of organization an interest group is working in. He differentiates between several organizational forms: individual consultants, firms, national associations and European associations. One interesting result from Bouwen's (2004) research is that European associations have considerably more access to the Commission than national associations, individual firms or political consultants (p. 358).

Furthermore, it is important for an interest group to convey their arguments orderly and through good internal and external communication to increase the chance of the policy-maker to accept the information (Koeppl, 2000, p. 73). Koeppl (2000) theorizes that a policy-maker should be seen as a recipient of information and is therefore equally as important as the provider of information (p. 74). By looking at the recipient, Koeppl (2000) theorizes that if a policy-maker accepts the information and uses it in the decision-making process, that can be seen as an interest group having access (p. 74). The interest groups confront the policy-makers with their preferences which may differ from the policy-makers' own stances (Koeppl, 2000). This confrontation can lead to cooperation between the interest groups and the policy-makers through good communication, which is the focus point of Koeppl's research. Koeppl (2000) then researched what is needed for a policy-maker to accept information from interest groups, and found that fast, comprehensive and balanced information that is communicated properly correlates with a policy-maker accepting the information (p. 78).

In addition to the precondition of needing access to influence policy-making, interest groups must also survive as an organization and therefore be able to adapt to changing environments (Halpin & Daugbjerg, 2013, p. 31). As Halpin & Daugbjerg (2013) suggest, when trying to adapt to the environment, interest groups must take into consideration their 'historical legacies and founding ideologies' which is the basis for a groups' identity (p. 44). Combined with Truman's path dependency, group identity and thus original, organizational decisions made, sends an interest group in a certain direction (Halpin & Daugbjerg, 2013, p. 45). To apply this notion to the complex and ever-changing institutions of the EU policy-makers, in order to obtain and maintain access effectively, interest groups must take into account their own identity and institutional choices.

The way an interest group is structured internally is also influenced by the next factor, organizational age. This is based on the assumption that young organizations still need to set

themselves up, create organizational roles and routines and establish relationships with policy-makers (Baum & Shipilov, 1996). In contrast, older organizations have had the time to do this and will have been able to show their reliability and accountability towards policy-makers (Baum & Shipilov, 1996, p. 62). Braun (2013) argues this as well, as she writes that '[interaction between public policy-makers and interest groups is] likely to be dictated by routine behavior …' (p. 809).

In conclusion, an interest group needs access to the policy-makers to represent their interests. While seeking access, both external and internal factors are encountered that influence the ease or hardship with which an interest group accesses the policy-makers. This thesis researches several internal factors.

3. Theoretical Framework

This chapter explains and defines the variables chosen to research in this thesis: Europeanness, organizational age, financial resources, functional differentiation, membership and access. It also sets out the theoretical arguments upon which each of these concepts is based. Taken together, this forms the theoretical framework for this research.

3.1 Influence and Access

Within much research on lobbying, the main question is about influence, as interest groups have their own objectives when providing information to the policy-makers (Koeppl, 2000, p. 70). However, as Dür (2008) notes, measuring interest group influence on policy outcomes is methodologically difficult. Policy-making happens in real time and taking 'policy-making' as an object of study, it is not possible to research it through experiments. An independent variable cannot be singled out, thus interest groups' activities and their influence on policy-making cannot be researched in this way. Researchers that have attempted to measure interest groups' influence on policy outcomes must always acknowledge that their results can only be an approximation and cannot be proven. This has led many researchers to move from researching influence per se to researching other aspects of interest groups that also play a

significant role in their behavior and goals (Dür, 2008, p. 560). One of these factors is gaining access to policy-makers, as it is an invariable precondition to influencing policy-making (Rasmussen & Gross, 2015, p. 346). Therefore, this thesis makes the conscious trade-off to research access to policy-makers as opposed to influencing policy outcomes. It is important to acknowledge here that obtaining access is not linearly related to influencing policy. This limitation is further elaborated upon in the discussion section.

A great amount of theoretical research has been done in the field of accessing policy-makers. Many of these projects research external factors that impact an interest groups' behavior and objectives, as discussed in the literature review above. More recently several researchers focused their attention on internal factors of interest groups. Complex phenomena like accessing policy-makers in an even more complex system that is the EU, inherently produces many variables that are interconnected. Researching all these variables independently would force the researcher to make choices that influence the generalizability of the findings and the overall usefulness of the research in adding to the academic debate and bringing forth new insights. This thesis therefore combines the theoretically most important internal factors of interest groups through the fuzzy set Qualitative Comparative Analysis (fsQCA) method which is further elaborated upon in the research design section. This method allows to include several complex factors and enables the results of this thesis to add to this field of studying interest groups' access to policy-makers in the EU. Noting that the link between access to policy-makers and influencing policy has been made before as described above, this thesis adds to the literature by enlarging this subsection of research on interest groups' access and uses a different research design, methods and data to confirm or reject previously found results.

3.2 Conceptualization of Variables

Before explaining the variables, it is important to look at the definition of an interest group. Interests are represented in the EU political system through many different channels and in different capacities. They can be social movement organizations, public interest groups, professional interests or labor unions amongst other labels that interest representatives give themselves (Fraussen & Beyers, 2015, p. 221). This thesis bases its definition of interest groups on the Commission's Transparency Register. The Transparency Register is a voluntary

register in which all types of interest representatives, ranging from professional organizations on national or EU level, to firms and individual consultants, can register their activities (European Commission, n.d. b). The database that emerged from this includes the interests that are represented, a register of meetings between Commissioners, cabinet members and Directors-General (European Commission, n.d. b). It also includes the FTE and budget an interest group spends on their interest representation (European Commission, n.d. b). By creating this register, the EU institutions aim to create transparency about the policy-making process and give citizens and researchers the possibility to scrutinize the institutions' activities and lobby influence (European Commission, n.d. b). As the aim of this thesis is to research interest groups' access to the EU policy-makers, the Transparency Register is a useful source to find a sample of different interest groups. The Transparency Register defines interest groups as '[all entities that engage in] activities designed to influence - directly or indirectly - policymaking, policy implementation and decision-making in the EU institutions, no matter where they are carried out or which channel or method of communication is used.' (Transparency Register, n.d. d). The Register thus includes all types of interest representation mentioned above, and a selection is made in the research design below to give the thesis focus.

3.2.1 Europeanness (EUR)

The first variable, Europeanness, has its bases in Bouwen's (2004) research. He found that the level on which the interest group works, impacts their access to the policy-makers. Bouwen (2004) formed his research to differentiate between four levels of organizational design (companies, associations on national and European level and consultants), as this was an important factor mostly neglected in previous research (p. 338). Bouwen (2004) theorized that the different institutions in the EU (Commission, EP and the Council) require different kinds of information and one level of organization is better at supplying a certain kind of information than the other. Eising (2007) followed the differentiation between levels, but only included national vs. European level associations. He hypothesized that European level associations have more access to the Commission. Eising (2007) argues that national level associations rather become a member of a specialized European association, than put effort in gaining access themselves, when their first priority is national interest representation. Both Bouwen (2004) and Eising (2007) found their underlying theoretical arguments to be true: European level associations have more access to the Commission than do any other level of

organization. This thesis thus uses these theories and empirical evidence and assumes that if an interest group represents European level interests, it has more access to the Commission. This assumption is used to interpret the results of this thesis.

3.2.2 Organizational Age (AGE)

The second variable, organizational age, is based on two arguments. First, Stinchcombe (1965) argued that young organizations still need to set up roles and routines both for themselves internally as externally within the bigger organizational structure they work in, in this case the workings of interest groups surrounding the Commission (Stinchcombe, 1965, as cited in Baum & Shipilov, 1996). In addition, older organizations that do have roles and routines often also have more experience in establishing relationships between the organization and their constituency (Baum & Shipilov, 1996). Second, Hannan & Freeman (1984) argued that older organizations have had the time to show their reliability and accountability to all parties involved (Hannan & Freeman, 1984, as cited in Baum & Shipilov, 1996). This logic can be combined with interest groups' access to policy-makers. Older interest groups have had the time to establish roles and routines themselves, create relationships with the policy-makers and their own constituency and have had the ability to show the reliability of their services and information. Braun (2013) used this long-term strategy as a factor to show that repeated interactions between policy-makers and interest groups (thus access) play a role in maintaining that access. Thus, the theoretical arguments of the authors above are in line: it is expected that when an interest group is older, they have more access to the Commission. This theoretical notion is used to analyze the final results of this thesis.

3.2.3 Financial Resources (RES)

The third variable is financial resources. This variable is based on Klüver (2012) and Albareda & Braun (2019) work. First, Klüver (2012) uses the broader concept of material resources which includes both financial resources and staff. The underlying theoretical argument for the variable resources is straightforward: both financial means and staff are necessary for an interest group to follow the development of legislation in the EU and participate in the policy-making process (Klüver, 2012, p. 495). If an interest group had no financial means to employ personnel, accessing the policy-makers at the EU would certainly be difficult to achieve. Increasing the financial means, makes it easier to employ qualified

personnel and chances to gain access to the policy-makers increases as well. Albareda & Braun (2019) used Klüver's findings and also hypothesized that the more resources an interest group has, the more likely they are to have access to the Commission (p. 476). Based on Klüver (2012) and Albareda & Braun's (2019) findings, this thesis also expects an interest group having more resources to also have more access.

3.2.4 Functional Differentiation (FUNCT)

The fourth variable is functional differentiation. This is based on Klüver (2012) and Albareda & Braun's (2019) studies, however, they vary slightly in their definition. Klüver (2012) defines functional differentiation as 'the division of staff within an organization and the distribution among a number of positions' (p. 495). She finds that when interest groups differentiate their internal positions mostly parallel to the Commissions' differentiations, the interest group has more access. Albareda & Braun (2019) based their work on Klüvers' findings and definition but add specification to the definition by saying functional differentiation 'implies the creation of separate units, departments, divisions or working groups … that focus on different policy issues …' (p. 472). This elaboration of the definition makes the variable clearer and more practical. For this reason, this thesis adopts Albareda & Braun's (2019) definition and researches the number of units as an indicator for functional differentiation. More units leads to more specialized personnel and thus more valuable information for the Commission. The interest groups that are researched in this thesis have most likely different names for their units, departments or divisions. Therefore, all these types of functional differentiation in the data collection process are considered and included in the research.

3.2.5 Membership (MEMBER)

The fifth variable chosen to include in this thesis is company membership. This is based on the argument that interest groups that represent a large constituency will provide information to the Commission that is supported by a large portion of the sector in that area, which is valuable to the Commission and therefore leads to access for the interest groups. Several researchers have used this theoretical argument in their research, but different variables and indicators are taken to measure the constituencies' support. Both the size of membership and decision-making structure within interest groups are aspects of this theoretical argument. Both variables are explained below, and a choice is made of which to include in this research.

First, Albareda & Braun (2019) found that an interest group that makes decisions by qualified majority or consensus gets more access to policy-makers as opposed to decisions that are made by simple majority (p. 469). The theoretical argument for this, is that policy-makers need information to form policies that will be supported politically by the constituency (Albareda & Braun, 2019). This is in line with what is established above by Koeppl (2000), that policy-makers fear backlash from the public and therefore consider as many interests as possible. Making decisions by consensus means the entire constituency can agree to the information that the interest group will bring to the policy-makers. Also, decisions by qualified majority represent at least a large portion of the interests of the constituency. Martinez-Diaz (2009) makes a similar point, saying that only the decisions that are made through a process in which all members are heard, are seen as legitimate (p. 390). Furthermore, Bouwen's (2004) theory of access goods supports this argument, as he theorizes that an interest group creates an access good (valuable information) to trade for access to the policy-makers. Following this, it is clear that policy-makers find information that will be supported by a large part of the constituency extremely valuable. Albareda & Braun (2019) found the correlation between access to policy-makers and interest group decision-making structure by quantitatively looking at a random sample of 248 European Associations' access to the Commission, drawn from Wonka et al.'s database dating from 2010 (p. 474). They looked at the decision-making procedure for the board, being the general assembly or plenary meeting of the European Association, as laid down in the bylaws (Albareda & Braun, 2019, p. 474).

Second, Fraussen & Beyers (2015) empirically researched and found that an interest groups' size of membership is a strong predictor for the likelihood to gain access (p. 214). A sizable membership is in line with the arguments made above, that a large membership equals having a large portion of the constituency represented, which leads to an interest groups' information being valuable for policy-makers, therefore granting them access. Junk (2018) also researched interest groups' members and took this as an indicator for the interest groups' size of constituency. Junk (2018) researched lobby groups in the UK and Germany and found that groups with a large constituency enjoyed higher access to legislators.

Both decision-making structure and membership have their bases in the same theoretical argument, however they measure slightly different things. Decision-making structure does not measure how big the constituency actually is, but how well the information

provided by an interest group is supported by the constituency that interest group does have. Membership clearly measures the size of the constituency, not how the information provided by that interest group is supported by the constituency. This thesis adopts the indicator membership as a measurement of an interest groups' constituency due to practical reasons: most interest groups disclose their members on their websites. Decision-making structure however is not always published, which would result in dropping a considerable number of cases. Therefore, the membership is adopted as a variable in this thesis.

In conclusion, each of the variables researched in this thesis have their own theoretical background. Together they influence and interest groups' access to the policy-makers. The underlying arguments in the theories upon which all variables rely, are tested in this research.

4. Research Design

This chapter discusses the research design chosen for this thesis and explains why this design was chosen. After this, several methods for measuring the variables are discussed and the most appropriate one is chosen for each. Lastly, this section explains how the data is collected and which cases were dropped.

4.1 Quantitative and Qualitative Research

In most research projects the researcher makes a choice between doing quantitative and qualitative research. As Ragin (1987) already noted, a large gap exists between research that focusses on quantitative methods and research that is qualitative (p. 70). The Qualitative Comparative Analysis (QCA) as first proposed by Ragin (1987) merges certain strengths of both types of research. QCA allows the researcher to fully grasp each case's specifics, while simultaneously comparing cases focusing on their broad similarities and differences (Ragin, 2003). Since social sciences usually involve many factors that can influence an outcome, it becomes difficult to assess the net contribution of one factor (independent variable) on the outcome (Ragin, 2003). QCA therefore sees different variables as inherently connected, not as competing variables (Ragin, 2003). Contrary to researching what the effect of one variable

is on the outcome, QCA aims to answer questions about the context and what cases are linked to the outcome (Ragin, 2003). The aim of QCA is not to establish one combination of factors that cause the outcome, but rather examine the many different causal configurations there are among a set of cases and their characteristics (Berg-Schlosser et al, 2012, p. 8).

4.2 fsQCA

This section explains the common terminology used in QCA and sets out the steps the researcher has taken to apply the fsQCA method. Some features of the QCA method are explain briefly here and more elaborately in the results and analysis section.

4.2.1 Terminology of QCA

The QCA method refers to independent variables (X) as sets or conditions and to the dependent variable (Y) as the outcome. Hence, further in this research the independent variables Europeanness (EUR), organizational age (AGE), financial resources (RES), functional differentiation (FUNCT) and membership (MEMBER) are referred to as sets or conditions. The dependent variable access (AC) is referred to as the outcome. The cases in this thesis are the individual interest groups in the insurance sector, which is further explained below.

4.2.2 csQCA and fsQCA

The original QCA method as proposed by Ragin, now referred to as crisp set QCA (csQCA), requires the researcher to assign a case by full membership of a set (1) or not (0) (Wagemann & Schneider, n.d., p. 7). As a consequence, there is no room for cases that cannot be assigned full membership but are only a member to a certain degree (Wagemann & Schneider, n.d., p. 7). The researcher needs to establish a threshold of when cases are a member of not, which needs a thorough theoretical basis (Wagemann & Schneider, n.d., p. 7). Yet, phenomena in the social sciences are often very difficult to dichotomize and put in boxes (Wagemann & Schneider, n.d., p. 7). Hence, unsurprisingly, a new type of QCA was developed to address the above-described shortcomings of csQCA. Fuzzy set QCA (fsQCA) allows for cases to be assigned membership to a set to a certain degree (Wagemann & Schneider, n.d., p. 8). This

means not only the scores of 1 and 0 are assigned, but a range of possibilities in between 1 and 0 are included, such as 0.33, 0.66 or 0.2, 0.4, 0.6, 0.8.

4.2.3 Truth Table

After the data is collected and fuzzy scores for all sets are gathered, a truth table is made. The truth table shows all logically possible configurations (Schneider & Wagemann, 2012, p. 92). Then cases are assigned to the truth table row of which that case is closest to the ideal type (Schneider & Wagemann, 2012, p. 92). If a case has a fuzzy score of 1 on all conditions in the research, it is exactly an ideal type. However, in social sciences, cases are rarely an ideal type (Schneider & Wagemann, 2012). Thus, it is calculated how far away each case is from the possible configurations and this way each case is assigned to the truth table row it most belongs to.

The next step is to logically minimize the truth table. The most frequently used way to do this is using the Quine-McCluskey Algorithm which is based on Boolean algebra (Schneider & Wagemann, 2012, p. 104). Truth table rows are transformed to a Boolean expression, after which the formula is reformulated more simply (Schneider & Wagemann, 2012, p. 105). After all rows are compared and reformulated, one is left with a logically minimized truth table.

4.2.4 Sufficiency and Necessity

Sufficiency and necessity are two central features of the fsQCA method. A certain combination of factors can be sufficient to produce the outcome but may not always be necessary (Berg-Schlosser et al., 2012, p. 10). In fsQCA, the membership score of the condition (or configuration of conditions) must be at most equal or smaller than its membership score to the outcome in order to be sufficient (Schneider & Wagemann, 2012, p. 67). In order for a condition (or configuration of conditions) to be necessary to produce the outcome, the membership score of the condition must be at least equal or greater than its membership score to the outcome (Schneider & Wagemann, 2012, p. 75). Consequently, a factor that is noted as sufficient, can be seen as a sub-set of the outcome and a factor that is necessary is a super-set (Wagemann & Schneider, n.d., p. 3).

4.2.4.1 Sufficient Conditions: Analyzing Consistency and Coverage

After the truth table is logically minimized as explained above, the rows that are left indicate sufficient configurations. The consistency and coverage of these sufficient conditions must be analyzed. If a configuration is a subset of the outcome completely, then that configuration is completely consistent (1) (Schneider & Wagemann, 2012). However, within the social sciences and when using fuzzy sets, a configuration is rarely completely consistent (Schneider & Wagemann, 2012). It is therefore important to what degree the configuration is consistent, to be able to draw accurate conclusions. The consistency for fuzzy sets is shown as a XY-plot. XY-plots can be made between any of the sets and the outcome. When plotting the outcome on the Y-axis and any of the sets on the X-axis, cases are shown as blue dots and placed in the graph based on their scores on the chosen variables. A diagonal is drawn from the 0 point to the right upper corner. Cases above the diagonal are complete members of the subset and cases below are not (Schneider & Wagemann, 2012). The fsQCA software calculates how many cases are below the diagonal compared to those above and measures how far those below are away from the diagonal. This results in a consistency level of between 0 and 1. A score closest to 1 is desirable, as this means very few cases contradict the sufficiency for a particular configuration (Schneider & Wagemann, 2012). In general, using fuzzy sets, a consistency level of 0.75 is the minimum (Schneider & Wagemann, 2012).

Coverage refers to the idea of wanting to know how much of a subset (or configuration) covers the superset of Y (the outcome) (Schneider & Wagemann, 2012). This can also be analyzed by looking at the XY-plot. If most cases score low on the X value and range along the Y-axis, this means coverage is low, because only those cases that have a low value on X result in different values of Y (Schneider & Wagemann, 2012). The fsQCA software also calculates the coverage, and their scores must be analyzed per configuration, therefore no minimum level is applicable here.

4.2.4.2 Necessary Conditions: Analyzing Sufficiency and Coverage

A condition is necessary if it is a superset of the outcome (Schneider & Wagemann, 2012). This indicated that without this condition, the outcome would not occur. No case in the data set can show the outcome without this condition. Again, this rarely happens in social sciences. Therefore, the degree to which a condition is necessary can be analyzed. The fsQCA software calculates the degree to which a case's membership in the condition is equal

to or greater than their membership in the outcome (Schneider & Wagemann, 2012, p. 141). When looking at the XY-plot, a condition is necessary if all cases fall below the diagonal (Schneider & Wagemann, 2012). The consistency level for necessity of that condition is in this case 1. Hence, a condition is more necessary to closer the consistency level of necessity is to 1.

The coverage of necessary conditions is similar to the coverage of sufficient conditions. If a condition scores high on necessity, it is important to analyze what portion of the outcome is covered by that (nearly) necessary condition. As stated above, the condition is necessary if it is a superset of the outcome. The coverage then relates to the relative size between the condition and the outcome. If the condition and the outcome are roughly the same size, then the coverage of that condition is high, as the outcome covers a large number of the cases that show the condition and the outcome (Schneider & Wagemann, 2012).

4.2.5 fsQCA and Access to EU Policy-Makers

fsQCA suits the topic of this thesis well, as there are many factors that influence an interest groups' access to the European policy-makers which are always at play. Other studies have not comparatively assessed which factors combined are sufficient or necessary for an interest group to gain access to EU policy-makers. Other research has proven the link between the chosen factors and access, but not the combination of the factors together. Researching which sufficient or necessary combination of these factors create access for interest groups is therefore interesting, as it combines other studies' causal links between several factors that are of interest. Moreover, the results of this thesis can produce a starting point for interest groups to create a new strategy to reach their goal of accessing the EU policy-makers.

4.3 Operationalization of Sets

The next section explains for each set how the data was collected and how the set is measured. It also shows the calibration into fuzzy scores (between 0 and 1). The fuzzy scores for all sets together are the data that is taken into the fsQCA software to be analyzed.

4.3.1 Europeanness (EUR)

The first set covers the level of representation of an interest group, or Europeanness (EUR). The level of representation as used in this thesis bases itself on Bouwen (2004) and Eising's (2007) differentiation between European level, national level, firms or consultants that act as an interest group at the EU. By differentiating between the level of representation, this set informs us about which level of interest representation is most useful when trying to obtain access to the EU policy-makers. Bouwen (2004) and Eising's (2007) findings show that the interest groups that are organized as a European Association enjoy the most access. Concluding from this, having a higher level of 'Europeanness' could lead to more access. This results in the following calibration for the EUR-set (Table 1).

Level of Europeanness	Fuzzy Set Score
Only representing European interests	1
Representing a mix of European and other interests	0.5
Only representing other interests than European	0

Table 1: Calibration EUR-set

The data needed to assign scores to the EUR-set is collected from the Commissions' Transparency Register and cross-referenced with information from the interest groups' websites.

4.3.2 Organizational Age (AGE)

The second set is the organizational age (AGE) of an interest group. Older organizations behave routinely (Braun, 2013) and have had enough time to establish good working relationships with policy-makers (Braun & Shipilov, 1996). The calibration of this set requires a look into Europe's welfare states' history. After the Second World War, a social model emerged in which European states started to provide services to ensure its citizens of health care, a regulated labor market, pensions, education and housing. However, during the 1980's many of these services were privatized (Harsch, 2001, p. 232). Also during the 1980's, the EU adopted the Single Market Programme, which included the liberalization of financial services (Hix & Hoyland, 2011, p. 193). Logically, during this time many (national) insurance companies and associations were established. Later, these associations started to actively represent their interests at the EU level. This thesis uses this historical background to calibrate the AGE-set. 1975 is taken as its benchmark. A range of 20 years per category was

taken based on the average age of the insurance sector interest groups. The benchmark of 1975 thus has a theoretical basis. The range of 20 years per category is a practical choice and is based on the data of the entirety of the insurance sector interests groups (not only the cases included in the sample). This results in the following scores to be assigned (Table 2):

Age (years)	Value Definition	Fuzzy Set Score
78 years or older	Old	1
Between 57 and 77 years	Old/medium	0.75
Between 36 and 56 years	Medium	0.5
Between 15 and 35 years	Young/medium	0.25
14 years or younger	Young	0

Table 2: Calibration AGE-set

This thesis uses the interest groups' websites, Google and social media (LinkedIn) to collect the data about their organizational age.

4.3.3 Financial Resources (RES)

The third set regards the financial resources of the interest group (RES). Based on Eising's (2007) research, an interest group has a higher probability of having access to the Commission if the budget is increased (p. 354). As argued by Klüver (2012), interest groups are not likely to disclose their full financial resources, therefore, she chose to take the number of employees as an indicator for an interest groups' financial resources (p. 500). This thesis follows this argument and takes the number of full time-equivalent (FTE) as an indicator. To calibrate this set the average of FTE was calculated for the entire category of 'in-house lobbyists and trade/business/professional associations' from the Transparency Register. These categories are further explained in the sample of cases section below. The average of this category is 1,7 FTE[1]. The calibration of the RES-set is done as follows (Table 3):

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[1] The supporting data is available by the author on request.

Resources (FTE)	Value Definition	Fuzzy Set Score
3,0 or more	High	1
Between 2,2 and 2,9	High/medium	0.75
Between 1,4 and 2,1	Medium	0.5
Between 0,6 and 1,3	Low/medium	0.25
0,5 or less	Low	0

Table 3: Calibration RES-set

The data for this set is abstracted from the Transparency Register.

4.3.4 Functional Differentiation (FUNCT)

The fourth set looks at the functional differentiation of the interest groups (FUNCT). This is based on Albareda & Braun's (2019) study in which they found that differentiating between more units correlates positively to having (more) access to administrative officials. Albareda & Braun (2019) coded functional differentiation in four categories: no units, between 1 and 5 units, between 6 and 9 units and having 10 or more units. This thesis follows this coding and turns it into a calibration. Albareda & Braun (2019) also researched interest groups in the EU, however, their sample was not focused on one branch, but was a random 248 interest groups. Still, the number of units per interest group in their study can be expected to be similar in the insurance sector. The FUNCT-set is thus calibrated as follows (Table 4):

Number of Units	Fuzzy Set Score
10 or more units	1
Between 6 and 9 units	0.66
Between 1 and 5 units	0.33
No units	0

Table 4: Calibration FUNCT-set

The data for this set is deducted from the interest groups' websites. A list of the website links used are shown in Appendix 1 per interest groups.

4.3.5 Membership (MEMBER)

The fifth set is membership (MEMBER). This is a combination of two theoretical arguments. First, Albareda & Braun (2019) found that interest groups' boards that make decisions through consensus or QMV represent a broader section of the constituency and therefore

theoretically have more political support for the information this interest group provides (p. 469). This can be combined with Junk's (2018) argument that organizations with a large constituency have more access. Albareda & Braun (2019) and Junk's (2018) research are thus based on the same theoretical argument: valuable information results from having a large constituency that supports the information being brought forward. Junk (2018) used the number of members per interest group as an indicator to measure the size of the constituency. This thesis adopts the indicator membership to measure the support the Commission can expect from different interest groups' constituencies. This thesis counts individual companies as members, not persons or associations as members. In addition, only full membership of the interest group is counted. Affiliate, associate or partner membership is excluded. The calibration of this set is therefore not straight forward. Many of the interest groups under research are national associations that represent the entire insurance sector in a particular Member State. The EU Member States' size in terms of territory and economy varies greatly. Clearly, a difference in the number of member companies is to be expected when comparing big and small countries, both of which the EU includes. The calibration below is therefore based on the average number of members in the entire insurance sector, which is a practical calibration rather than a theoretical. This results in the following calibration (Table 5):

Number of Members	Fuzzy Set Score
294 members or more	1
Between 223 and 293 members	0.75
Between 152 and 222 members	0.5
Between 81 and 151 members	0.25
80 member or less	0

Table 5: Calibration MEMBER-set

Two associations (Insurance Europe and the International Union of Marine Insurance) show countries as their members on their websites, and per country the association(s) that is a member. Only counting the countries as members would result in skewed scores, therefore of each member association the member companies were counted and added up (see Appendix 2 and 3). For some of these associations the number of members could not be found. This is deemed insignificant by the author, as the number of members greatly exceeds 294 in both cases, therefore the fuzzy score is 1 regardless of the missing data.

4.3.6 Access (AC)

The last set is access (AC). The literature review above mentioned access as a general term, but many of the sources cited use different definitions of access and consequently different measurements. The different definitions and measurements are discussed, whereafter the choice of measurement of this thesis is explained and the AC-set is calibrated.

First, Rasmussen and Gross (2015) were interested in measuring bias when granting access. They therefore defined having access as an interest group representative being selected to the advisory committees to the Commission (p. 351). Focusing their research on access to policy-makers in Flanders, Fraussen & Beyers (2016) take a similar measurement of access to Rasmussen & Gross (2015) as they consider being a member of the Strategic Advisory Councils as having access. Bouwen (2004) chose to view access the other way around as he qualitatively researched granting access from the policy-makers point of view. He regards interest representatives as having access if the policy-maker under research has contact with an interest representative (Bouwen, 2004). Bouwen (2004) simultaneously takes into account the usefulness and regularity of these contacts between interest representatives and policy-maker. Bouwen (2004) researched the degree to which four different types of interest representatives (European Associations, national associations, individual firms and political consultants) have access and compared these to each other. Albareda & Braun (2019) measured access with four indicators, first dichotomously and second the level of access (p. 475). Albareda & Braun (2019) differentiate between having access to administrative and political officials and measure each differently (p. 482). Albareda & Braun (2019) defined an interest group as having access to administrative officials if that interest group participated in the Commission's expert groups. The level of access was then measured by counting the number of committees that an interest group participated in (not in the capacity of observer) (Albareda & Braun, 2019). To measure the access to political officials, Albareda & Braun (2019) did not look at the expert groups but counted the number of meetings an interest group had with the Commissioners (p. 475). Eising (2007) used the frequency of meetings (no, annually, half yearly, quarterly, monthly, weekly) of EU associations to all three EU institutions (Commission, EP and Council) as a basis for his measurement of access.

The paragraph above shows that access can be measured in several different ways. This thesis therefore applies a multi-item index. A multi-item measurement allows for more

complicated concepts to be measured with more than one feature (Buttolph Johnson & Reynolds, 2005, p. 173). By using a combination of indicators, the overall measurement improves. The indicators chosen for the measurement of access are:

1. The number of meetings with the Commission;
2. The number of expert groups and other entities an interest group participates in;
3. The number of contributions to public consultations.

The first item is measured between 01-12-2014 and present. This is due to the fact that the Transparency Register's start of recording meetings between interest groups and the Commission was 01-12-2014. In general, it is difficult to establish a threshold of meetings between an interest group and the Commission to be 'a lot'. This depends on many factors, of which a crucial one is the legislation the Commission is working on at that time. During the development of a certain piece of legislation, both the Commission and interest groups that concern themselves with that type of legislation will be very active. Conversely, in periods where no legislation is being made, meetings between the two parties will be fewer. This thesis does not focus on one particular piece of legislation, nor one particular period in time. The calibration below is therefore based on the average number of meetings (3,8; see calculation in Appendix 4) between the Commission and the insurance sector interest groups. The first item is thus calibrated as shown in Table 6.

Number of Meetings	Fuzzy Set Score
12 meetings or more	1
Between 6 and 11 meetings	0.66
Between 1 and 5 meetings	0.33
No meetings	0

Table 6: Calibration AC-set Item 1: Meetings with the Commission

The second item is based on the overview of expert groups, comitology and other committees on the website of the Commission (European Commission, n.d. a). The Commission website shows 16 expert groups (04-05-2021) that work on financial regulation in general (European Commission, n.d. a). From these 16, a selection of 3 expert groups is made (see Appendix 5). This is based on their mission and policy area that are closest to the interests of the insurance sector, as it is expected interest groups only participate in those expert groups that touch upon their area of business. Therefore, if an interest group participates in 3 expert groups or more,

this is considered a considerable amount and gets assigned a fuzzy score of 1. The scores that are assigned for the second item are shown in Table 7.

Number of Expert Groups	Fuzzy Set Score
Participation in 3 expert groups or more	1
Participation in 2 expert groups	0.66
Participation in 1 expert group	0.33
No participation in expert groups	0

Table 7: Calibration AC-set Item 2: Participation in Expert Groups

The third item is the number of contributions to public consultations. Public consultations are held by the Commission and are open to everyone. All interested parties can contribute their opinions and arguments about a certain question the Commission puts forward while the public consultation is open. After closing of the consultation, the Commission uses the information put forward to make policy decisions. Since this type of access shows to what extent interest groups use this public access to the Commission.

The number of contributions an interest group makes to the public consultations depends on many factors, for example their focus and attention of their resources. Furthermore, just as explained above for the first item, contributions will increase when an important piece of legislation which receives a lot of attention within the sector is being made. Therefore, the calibration is also based on the average on contributions of interest groups in the insurance sector. The item is calibrated as follows (Table 8):

Number of Contributions	Fuzzy Set Score
5 or more contributions	1
3 or 4 contributions	0.66
1 or 2 contributions	0.33
0	0

Table 8: Calibration AC-set Item 3: Contributions to Public Consultations

These three features were chosen as a result from previous studies using the same items to measure access. In addition, all three items can be easily collected from the Transparency Register. After the data is collected, the scores on all items are accumulated and normalized to produce a fuzzy score that is used in the analysis.

4.4 Sample of Cases and Data Collection

The unit of study of this thesis are trade and business interest groups representing the insurance sector in the EU. Therefore, the cases referred to in this thesis are the different interest groups. A first selection of a random sample of cases was taken from the EU Transparency Register. The Transparency Register allows to search per keyword. The search term given was 'insurance' which gave 162 results (02-05-2021). The Transparency Register differentiates between six categories:

1. Professional consultancies, law-firms, self-employed consultants;
2. In-house lobbyists, and trade/business/professional associations;
3. Non-governmental organizations;
4. Think tanks, research and academic institutions;
5. Organizations representing churches and religious communities;
6. Organizations representing local regional and municipal authorities or other public/mixed entities (European Commission, n.d. b).

The sample of 162 interest groups was transferred to Excel along with the number of the category (1 to 6). Category 2 was chosen and the subcategories (A to D) were added to Excel:

A. Companies & groups;
B. Trade and business associations;
C. Trade unions and professional associations;
D. Other organizations.

Category 2B was filtered out (Appendix 6), as trade and business associations are the focus of this thesis This leaves a sample of 52 interest groups, being trade or business associations. The sample is thus random to a certain extent. Cases were not further selected on purpose, therefore, the level of randomness of the sample increases the validity and generalizability of the results. The data on the 52 cases was collected per set as described above and names of the interest groups were abbreviated (Appendix 7).

During the process of data collection, several cases had to be dropped due to data being unretrievable. For the sets EUR, RES, and AC all information was found in the Transparency Register. The AGE-set caused 4 cases to be dropped due to an unclear or unknown date of foundation (PEIF, RAB, LPI and D4E). The FUNCT-set caused 11 cases to

be dropped (GFIA, FeBAF, ABI-1, IUA, ANAT, ABIR, ABI-2, FECIF, ISDA, INVEU, TI). The information on the websites of these interest groups was too doubtful to refer to the functional differentiation as it is meant in this thesis. This left 37 cases that were researched and taken into the analysis.

4.5 Reliability and Validity

In this section the reliability and validity of the research is discussed. First, a note on the reliability of the method fsQCA, the data collection and sample is made. Research methods and data collection can be deemed reliable if the same procedure of measurement and data is repeated and generates the same results (Carmines & Zeller, 1979). The fsQCA software is in this regard very reliable: the software is freely available and if the same data is put in, the same outcome will occur. The data collection as done is this thesis can also be deemed reliable. The data for four of the sets is publicly available through the Transparency Register. The Register is a stable source which makes accessing the data reliable. The data for two sets is abstracted from the interest groups websites. This can be deemed less reliable, as the information on the websites might not be up to date. The information can also be misinterpreted. However, whenever a choice was made for one interpretation or another, the author is transparent about this throughout the thesis.

Second, the validity of the data and the sample is discussed. Validity can be divided into internal and external validity. The internal validity refers to what extent there is causality between the independent and dependent variable (Jiménez-Buedo & Miller, 2010). This thesis assumes no causation between the variables, only the correlation between all variables. The fact that the independent variables correlate and thus affect the dependent variable has been established by previous research. This thesis builds on these findings and assumes the correlation to be true. It then builds on that by trying to establish the importance of each independent variable on the occurrence of the dependent variable.

The external validity refers to the generalizability across different types of settings of the claimed relationship between the independent and dependent variable (Jiménez-Buedo & Miller, 2010). The fsQCA usually includes a moderate N, meaning between roughly 20 and 40 cases. The sample of this thesis is 37, which makes the results fairly generalizable across

the insurance sector interest groups. The external validity is however lower when looking at the generalizability toward interest groups in different sectors. Interest groups in other sectors could show a different level of importance on the variables in this thesis.

5. Results and Analysis

This chapter shows the results from the fsQCA method and analyzes the outcomes. The results and analysis are structured as follows. First, the raw and fuzzy scores that were collected are presented per set. Next the sufficient conditions produced by the fsQCA software are analyzed. Following, the truth table analysis is done. Hereafter the necessary conditions are touched upon and finally several robustness checks are carried out.

5.1 Raw Data and Fuzzy Scores per Set

First, for each set the raw data is presented. The fuzzy scores are assigned according to the calibration explained in the research design. Hereafter, the fuzzy scores are presented together in one table, which was uploaded to the software for analysis.

5.1.1 Europeanness (EUR)

The EUR-set calibration differentiates between 0, 0.5 and 1. 1 is assigned when only European interests are represented, 0.5 for a mix of European and other interests and 0 for interest groups that only represent other interests than European. This results in the raw and fuzzy scores shown in Table 9 below.

Interest Group	Level of Europeanness	Fuzzy Score
ABAM BVT	only other than EU	0
AIFI	only other than EU	0
AIPB	only other than EU	0
AMICE	only EU	1
ANIA	only other than EU	0
Assosim	only other than EU	0
ASSURALIA	only other than EU	0
BIBA	only other than EU	0
CAP	only other than EU	0
CLLS	only other than EU	0
CML	only other than EU	0
DAI	only other than EU	0
EAEE	only other than EU	0
ECAR	only EU	1
FDATA	mix	0.5
FFA	only other than EU	0
FFI	only other than EU	0
FINNOR	only other than EU	0
FLA	only other than EU	0
FNG	only other than EU	0
FORS	only other than EU	0
GDV	only other than EU	0
ICISA	only other than EU	0
IE	only EU	1
II	only other than EU	0
ILAG	only other than EU	0
ILPA	mix	0.5
IPD	only other than EU	0
IUMI	only other than EU	0
MIA	only other than EU	0
RAA	only other than EU	0
SEE	only EU	1

SVENFÖR	only other than EU	0	
SZZ	only other than EU	0	
VVO	only other than EU	0	
WINDEU	mix	0.5	
WNA	only other than EU	0	

Table 9: Raw and Fuzzy Scores EUR-set

5.1.2 Organizational Age (AGE)

The AGE-set calibration differentiates between 0, 0.25, 0.5, 0.75 and 1. 1 is assigned for the oldest interest groups and the score goes down the younger an interest group is. A value definition is given (old, medium, young and combinations of these) which is then transformed into a fuzzy score. This results in the raw and fuzzy scores shown in Table 10 below.

Interest Group	Age (years)	Value	Fuzzy Score
ABAM BVT	102	old	1
AIFI	35	medium	0.5
AIPB	17	young/medium	0.25
AMICE	13	young	0
ANIA	77	old/medium	0.75
Assosim	19	young/medium	0.25
ASSURALIA	17	young/medium	0.25
BIBA	44	medium	0.5
CAP	27	young/medium	0.25
CLLS	35	young/medium	0.25
CML	13	young	0
DAI	43	medium	0.5
EAEE	114	old	1
ECAR	28	young/medium	0.25
FDATA	7	young	0
FFA	5	young	0
FFI	14	young	0

FINNOR	11	young	0
FLA	30	young/medium	0.25
FNG	20	young/medium	0.25
FORS	17	young/medium	0.25
GDV	73	old/medium	0.75
ICISA	93	old	1
IE	68	old/medium	0.75
II	7	young	0
ILAG	13	young	0
ILPA	19	young/medium	0.25
IPD	120	old	1
IUMI	147	old	1
MIA	54	medium	0.5
RAA	53	medium	0.5
SEE	21	young/medium	0.25
SVENFÖR	84	old	1
SZZ	29	young/medium	0.25
VVO	122	old	1
WINDEU	39	medium	0.5
WNA	46	medium	0.5

Table 10: Raw and Fuzzy Scores AGE-set

5.1.3 Financial Resources (RES)

The RES-set calibration differentiates between 0, 0.25, 0.5, 0.75 and 1. 1 is assigned to the interest groups with the most full-time FTE employees and the score goes down the less FTE an interest group employs. A value definition is given (high, medium, low and combinations of these) which is then transformed into a fuzzy score. This results in the raw and fuzzy scores shown in Table 11 below.

Interest Group	Resources (FTE)	Value	Fuzzy Score
ABAM BVT	0,2	low	0
AIFI	1	low/medium	0.25
AIPB	1	low/medium	0.25
AMICE	2.0	medium	0.5
ANIA	5	high	1
Assosim	4,5	high	1
ASSURALIA	3.5	high	1
BIBA	0,8	low/medium	0.25
CAP	2,2	high/medium	0.75
CLLS	0,2	low	0
CML	1.0	low/medium	0.25
DAI	2,8	high/medium	0.75
EAEE	0.2	low	0
ECAR	0.2	low	0
FDATA	1.0	low/medium	0.25
FFA	10.0	high	1
FFI	6.5	high	1
FINNOR	8,2	high	1
FLA	0,5	low	0
FNG	6.8	high	1
FORS	0,2	low	0
GDV	11,8	high	1
ICISA	1.0	low/medium	0.25
IE	35.0	high	1
II	2.2	high/medium	0.75
ILAG	0,2	low	0
ILPA	0,2	low	0
IPD	10,5	high	1
IUMI	0,5	low	0
MIA	0.2	low	0
RAA	1.0	low/medium	0.25
SEE	1,2	low/medium	0.25

SVENFÖR	3.8	high	1
SZZ	0,8	low/medium	0.25
VVO	2,2	high/medium	0.75
WINDEU	8,8	high	1
WNA	0.5	low	0

Table 11: Raw and Fuzzy Scores RES-set

5.1.4 Functional Differentiation (FUNCT)

The FUNCT-set calibration differentiates between 0, 0.33, 0.66 and 1. 1 is assigned to the interest groups that differentiate between the most units and the score goes down the less units an interest group has. The number of units translates directly into a fuzzy score, therefore no value definition is used for the FUNCT-set. This results in the raw and fuzzy scores shown in Table 12 below.

Interest Group	Number of Units	Fuzzy Score
ABAM BVT	5	0.33
AIFI	7	0.66
AIPB	4	0.33
AMICE	9	0.66
ANIA	7	0.66
Assosim	6	0.66
ASSURALIA	11	1
BIBA	6	0.66
CAP	0	0
CLLS	18	1
CML	0	0
DAI	4	0.33
EAEE	12	1
ECAR	0	0
FDATA	0	0
FFA	12	1
FFI	5	0.33

FINNOR	0	0
FLA	7	0.66
FNG	0	0
FORS	4	0.33
GDV	10	1
ICISA	5	0.33
IE	12	1
II	7	0.66
ILAG	5	0.33
ILPA	5	0.33
IPD	11	1
IUMI	7	0.66
MIA	5	0.33
RAA	0	0
SEE	0	0
SVENFÖR	3	0.33
SZZ	8	0.66
VVO	7	0.66
WINDEU	0	0
WNA	17	1

Table 12: Raw and Fuzzy Scores FUNCT-set

5.1.5 Membership (MEMBER)

The MEMBER-set calibration differentiates between 0, 0.25, 0.5, 0.75 and 1. 1 is assigned to the interest groups that have a high number of member companies and the score goes down the less members an interest group has. The number of members translates directly into a fuzzy score, therefore no value definition is used for the MEMBER-set. This results in the raw and fuzzy scores shown in Table 13 below.

Interest Group	Number of Members	Fuzzy Score
ABAM BVT	15	0
AIFI	156	0,5
AIPB	38	0
AMICE	83	0,25
ANIA	131	0,25
Assosim	62	0
ASSURALIA	90	0,25
BIBA	1800	1
CAP	28	0
CLLS	55	0
CML	44	0
DAI	159	0,5
EAEE	47	0
ECAR	5	0
FDATA	48	0
FFA	245	0,75
FFI	314	1
FINNOR	240	0,75
FLA	241	0,75
FNG	150	0,25
FORS	187	0,75
GDV	460	1
ICISA	50	0
IE	3029	1
II	133	0,25
ILAG	26	0
ILPA	305	1
IPD	82	0,25
IUMI	2461	1
MIA	18	0
RAA	50	0
SEE	16	0

Interest Group		
SVENFÖR	49	0
SZZ	21	0
VVO	120	0,25
WINDEU	400	1
WNA	186	0,75

Table 13: Raw and Fuzzy Scores MEMBER-set

5.1.6 Access (AC)

The AC-set is based on the measurement of three items: meetings with the Commission, number of expert groups participated in and the number of contributions to public consultations. Each item differentiates between scores of 0, 0.33, 0.66 and 1. 1 is assigned to a higher number of each set and the score goes down the fewer meetings, expert groups or contributions an interest group has. The number on each item translates directly into a fuzzy score, therefore no value definition is used for each item of the AC-set. The fuzzy scores for each item are summed up. Hereafter the sum is normalized to produce a fuzzy score between 0 and 1. The raw and fuzzy scores for each item are show in Table 14 (meetings), Table 15, (expert groups) and Table 16 (contributions to consultations). The sum of all three fuzzy scores and normalization are shown in Table 17.

Interest Group	Number of Meetings	Fuzzy Score
ABAM BVT	0	0
AIFI	0	0
AIPB	0	0
AMICE	5	0,33
ANIA	6	0,66
Assosim	0	0
ASSURALIA	0	0
BIBA	0	0
CAP	0	0
CLLS	0	0
CML	0	0
DAI	1	0,33

EAEE	1	0,33
ECAR	1	0,33
FDATA	1	0,33
FFA	8	0,66
FFI	13	1
FINNOR	1	0,33
FLA	1	0,33
FNG	0	0
FORS	0	0
GDV	35	1
ICISA	0	0
IE	54	1
II	9	0,66
ILAG	0	0
ILPA	5	0,33
IPD	2	0,33
IUMI	0	0
MIA	0	0
RAA	1	0,33
SEE	3	0,33
SVENFÖR	1	0,33
SZZ	0	0
VVO	1	0,33
WINDEU	77	1
WNA	0	0

Table 14: Raw and Fuzzy Scores AC-set Item 1: Meetings with the Commission

Interest Group	Number of Expert Groups	Fuzzy Score
ABAM BVT	0	0
AIFI	0	0
AIPB	0	0
AMICE	2	0,66
ANIA	0	0
Assosim	0	0
ASSURALIA	0	0
BIBA	0	0
CAP	0	0
CLLS	0	0
CML	0	0
DAI	0	0
EAEE	0	0
ECAR	0	0
FDATA	0	0
FFA	0	0
FFI	0	0
FINNOR	0	0
FLA	0	0
FNG	0	0
FORS	0	0
GDV	4	1
ICISA	0	0
IE	9	1
II	0	0
ILAG	0	0
ILPA	0	0
IPD	0	0
IUMI	2	0,66
MIA	0	0
RAA	0	0
SEE	1	0,33

Interest Group	Number of Contributions	Fuzzy Score
SVENFÖR	0	0
SZZ	0	0
VVO	0	0
WINDEU	2	0,66
WNA	0	0

Table 15: Raw and Fuzzy Scores AC-set Item 2: Participation in Expert Groups

Interest Group	Number of Contributions	Fuzzy Score
ABAM BVT	0	0
AIFI	0	0
AIPB	4	0,66
AMICE	19	1
ANIA	3	0,66
Assosim	1	0,33
ASSURALIA	5	1
BIBA	0	0
CAP	0	0
CLLS	1	0,33
CML	0	0
DAI		0,66
EAEE	0	0
ECAR	1	0,33
FDATA	0	0
FFA	12	1
FFI	8	1
FINNOR	5	1
FLA	5	1
FNG	1	0,33
FORS	0	0
GDV	28	1
ICISA	3	0,66
IE	21	1
II	3	0,66

ILAG	0	0
ILPA	1	0,33
IPD	2	0,33
IUMI	0	0
MIA	2	0,33
RAA	0	0
SEE	1	0,33
SVENFÖR	0	0
SZZ	0	0
VVO	2	0,33
WINDEU	8	1
WNA	0	0

Table 16: Raw and Fuzzy Scores AC-set Item 3: Contributions to Public Consultations

Interest Group	Sum Fuzzy Scores AC	Normalized Sum Fuzzy Scores AC
ABAM BVT	0	0
AIFI	0	0
AIPB	0,66	0,22
AMICE	1,99	0,6633333333
ANIA	1,32	0,44
Assosim	0,33	0,11
ASSURALIA	1	0,3333333333
BIBA	0	0
CAP	0	0
CLLS	0,33	0,11
CML	0	0
DAI	0,99	0,33
EAEE	0,33	0,11
ECAR	0,66	0,22
FDATA	0,33	0,11
FFA	1,66	0,5533333333
FFI	2	0,6666666667

FINNOR	1,33	0,4433333333
FLA	1,33	0,4433333333
FNG	0,33	0,11
FORS	0	0
GDV	3	1
ICISA	0,66	0,22
IE	3	1
II	1,32	0,44
ILAG	0	0
ILPA	0,66	0,22
IPD	0,66	0,22
IUMI	0,66	0,22
MIA	0,33	0,11
RAA	0,33	0,11
SEE	0,99	0,33
SVENFÖR	0,33	0,11
SZZ	0	0
VVO	0,66	0,22
WINDEU	2,66	0,8866666667
WNA	0	0

Table 17: Sum of Fuzzy Scores of the 3 Items for AC-set and Normalized Fuzzy Scores

Table 18 below gathers the fuzzy scores of all sets into one table which is uploaded to the software for analysis.

Interest Group	EUR	AGE	RES	FUNCT	MEMBER	AC
ABAM BVT	0	1	0	0.33	0	0
AIFI	0	0.5	0.25	0.66	0,5	0
AIPB	0	0.25	0.25	0.33	0	0,22
AMICE	1	0	0.5	0.66	0,25	0,6633333333
ANIA	0	0.75	1	0.66	0,25	0,44
Assosim	0	0.25	1	0.66	0	0,11
ASSURALIA	0	0.25	1	1	0,25	0,3333333333
BIBA	0	0.5	0.25	0.66	1	0

CAP	0	0.25	0.75	0	0	0
CLLS	0	0.25	0	1	0	0,11
CML	0	0	0.25	0	0	0
DAI	0	0.5	0.75	0.33	0,5	0,33
EAEE	0	1	0	1	0	0,11
ECAR	1	0.25	0	0	0	0,22
FDATA	0.5	0	0.25	0	0	0,11
FFA	0	0	1	1	0,75	0,5533333333
FFI	0	0	1	0.33	1	0,6666666667
FINNOR	0	0	1	0	0,75	0,4433333333
FLA	0	0.25	0	0.66	0,75	0,4433333333
FNG	0	0.25	1	0	0,25	0,11
FORS	0	0.25	0	0.33	0,75	0
GDV	0	0.75	1	1	1	1
ICISA	0	1	0.25	0.33	0	0,22
IE	1	0.75	1	1	1	1
II	0	0	0.75	0.66	0,25	0,44
ILAG	0	0	0	0.33	0	0
ILPA	0.5	0.25	0	0.33	1	0,22
IPD	0	1	1	1	0,25	0,22
IUMI	0	1	0	0.66	1	0,22
MIA	0	0.5	0	0.33	0	0,11
RAA	0	0.5	0.25	0	0	0,11
SEE	1	0.25	0.25	0	0	0,33
SVENFÖR	0	1	1	0.33	0	0,11
SZZ	0	0.25	0.25	0.66	0	0
VVO	0	1	0.75	0.66	0,25	0,22
WINDEU	0.5	0.5	1	0	1	0,8866666667
WNA	0	0.5	0	1	0,75	0

Table 18: Fuzzy Scores All Sets

5.2 Sufficient Configurations

The fuzzy scores above were uploaded to the software fsQCA. To analyze this data, the fuzzy scores are first transformed into a truth table using the Truth Table Algorithm. The Truth Table Algorithm reorganizes the fuzzy scores. In the table of fuzzy scores above, the focus is on each individual case and its score per set. The truth table uses this information, but focuses on configurations of sets, that is different combinations of sets. The software assigns the cases to their corresponding configuration. This is done by calculating the distance of a cases' scores to the ideal type (Schneider & Wagemann, 2012). This thesis researches five conditions. If a case has a fuzzy score of 1 on all five conditions, it is exactly an ideal type. Having five conditions, there are 2^5 = 32 ideal types in this thesis. However, as can already be deducted from the fuzzy score table above, cases almost never show a score of 1 on all conditions. This is common in fsQCA. Therefore, the software calculates how far away the combination of fuzzy scores of a certain case is away from the ideal type and then assigns the cases to the ideal type and thus truth table row it most belongs to (Schneider & Wagemann, 2012).

Next, for each configuration the outcome value must be determined. All cases assigned to each row are a member of that row to a certain degree. If all cases' membership score to the row is smaller or equal to those cases' score on access, it is sufficient to produce the access and the row gets assigned a 1 (Schneider & Wagemann, 2012). If one or more cases assigned to a row have a bigger membership score to the row than to access, this row is not a perfect subset of access and can therefore not be termed a sufficient configuration to produce access and gets assigned a 0 (Schneider & Wagemann, 2012). The outcome value of 1 or 0 is shown in the *AC-column* in Table 19 below. This thesis has a moderate-N (37), therefore if there is a minimum of one case with a smaller membership score to the row than its membership in access, it already gets assigned a 1. For example, within large-N studies, it is better to take a minimum of several cases before concluding that a particular row is sufficient to produce the outcome (Schneider & Wagemann, 2012). The software does all these steps which results in the truth table below.

Row	EUR	AGE	RES	FUNCT	MEMBER	AC	Number	Raw Consist.
1	1	1	1	1	1	1	1	1
2	0	1	1	1	1	1	1	0.78294
3	0	0	1	1	1	1	1	0.76059
4	0	0	1	0	1	0	2	0.69482
5	0	0	1	1	0	0	3	0.52968
6	0	1	1	1	0	0	3	0.50118
7	0	1	1	0	0	0	1	0.45974
8	1	0	0	0	0	0	2	0.42735
9	0	0	0	0	1	0	1	0.39405
10	0	0	1	0	0	0	2	0.39102
11	0	0	0	1	1	0	1	0.35040
12	0	1	0	1	1	0	1	0.34017
13	0	1	0	1	0	0	1	0.33184
14	0	1	0	0	0	0	2	0.31151
15	0	0	0	1	0	0	2	0.28674
16	0	0	0	0	0	0	3	0.23550

Table 19: Truth Table

Contrary to the 32 possible configurations there are, the truth table only shows 16 configurations. This is because within this data set, only the 16 configurations above were observed (the *number column* has at least 1 case assigned to that row). The other 16 configurations were not observed. What this means and how the author dealt with unobserved configurations is explained in the truth table analysis section below.

The Truth Table Algorithm found three sufficient configurations (row 1, 2 and 3):

1. EUR*AGE*RES*FUNCT*MEMBER → AC[2]

2. ~EUR*AGE*RES*FUNCT*MEMBER → AC[3]

3. ~EUR*~AGE*RES*FUNCT*MEMBER→ AC

Now these sufficient configurations can be analyzed. First, the consistency scores of the three sufficient configurations are interpreted. Each of the three configurations has only one case assigned to them. However, the calculation of consistency of the configuration includes all cases in the data set (37). The analysis of the consistency can be done by using the XY-plots

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[2] * Is the symbol for AND.

[3] ~ is the symbol for negation or NOT.

the software produces. Each set can individually be plotted against the outcome. The software calculates the consistency score of each set individually. The consistency score of the entire configuration is analyzed below. If most cases are above the diagonal, the condition is likely to be sufficient to produce the outcome. If most cases are below the diagonal, the condition is likely to be necessary to produce the outcome.

The first XY-plot shows the EUR-set (X-axis) and AC (Y-axis) (Figure 1). There are several cases both above and below the diagonal. It is thus concluded that the level of Europeanness can contribute to an interest group having access but is not a very important factor.
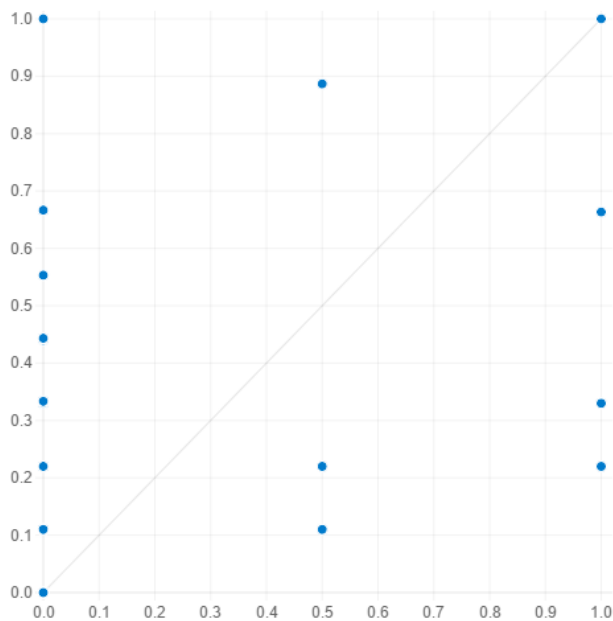
Figure 1: XY-plot EUR (X-axis) and AC (Y-axis)

The next XY-plot compares AGE on the X-axis to access on the Y-axis (Figure 2). The conclusions from this plot are similar to those of the EUR-access plot. Cases are both above and below the diagonal and relatively far away from the diagonal. Thus, also the age of an interest group can contribute to having access but is not a very important factor.
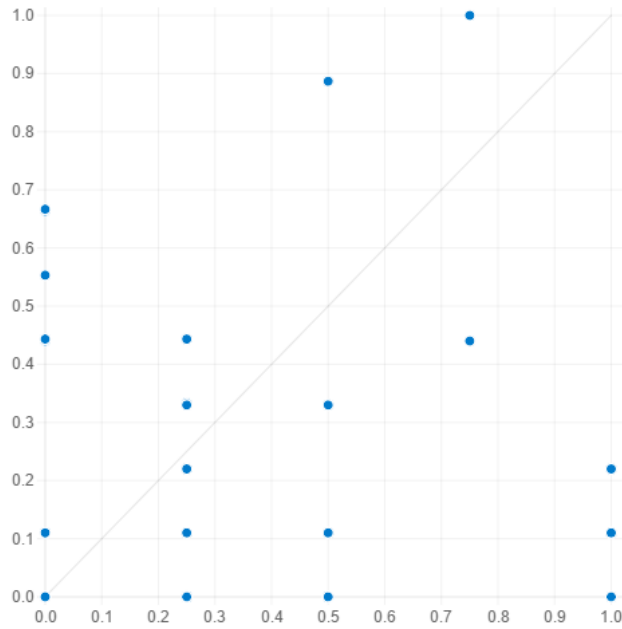
Figure 2: XY-plot AGE (X-axis) and AC (Y-axis)

Next the condition RES (X-axis) is plotted against access (Y-axis) (Figure 3). Compared to the XY-plots of EUR and AGE, most cases are below the diagonal. The RES-set is likely to be a necessary condition for producing access. As follows, an interest groups' resources are more important in producing access than are its level of Europeanness or age.
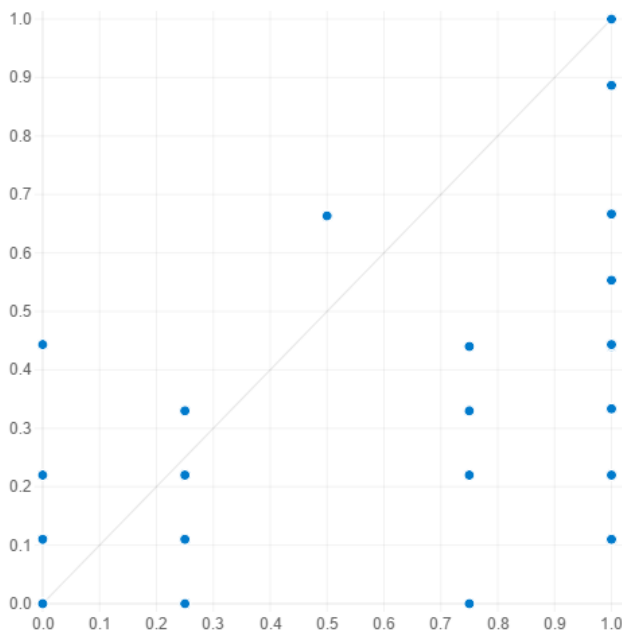
Figure 3: XY-plot RES (X-axis) and AC (Y-axis)

The next plot is FUNCT (Y-axis) against access (X-axis) (Figure 4). Again, compared to EUR and AGE, this plot shows relatively many cases below the diagonal, which means the condition FUNCT is also important in producing access. Creating different departments or units that each focus on a certain aspect of insurance could thus increase an interest groups' chances to access the Commission.
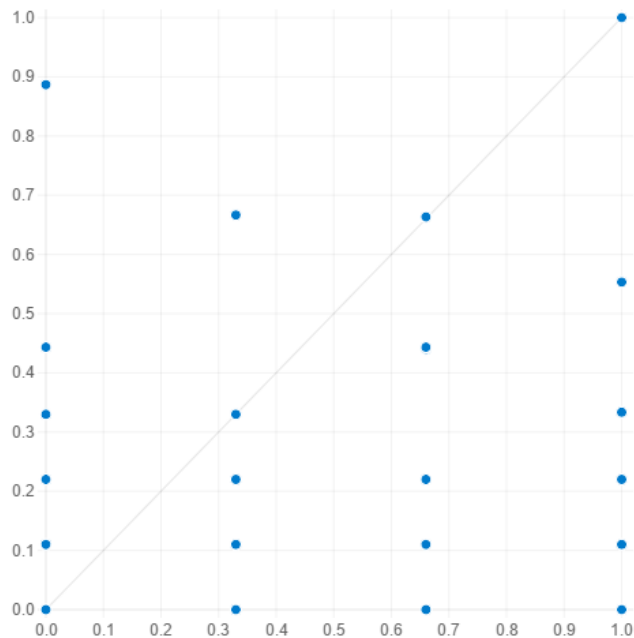
Figure 4: XY-plot FUNCT (X-axis) and AC (Y-axis)

The last XY-plot shows the condition MEMBER (X-axis) against access (Y-axis) (Figure 5). From this plot it can be deduced that the condition MEMBER is more important than EUR and AGE, as relatively many cases are below the diagonal. As follows, it is more important for an interest group to have many companies as their members than is their level of Europeanness or age.
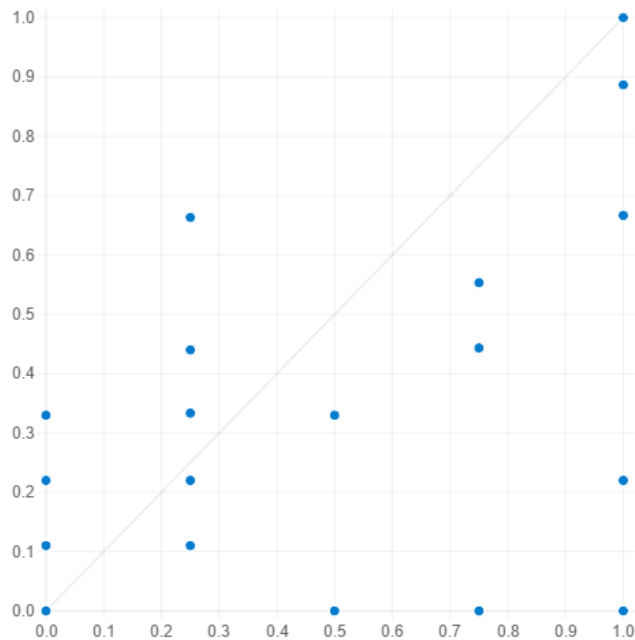
Figure 5: XY-plot MEMBER (X-axis) and AC (Y-axis)

The analysis of the XY-plots per condition confirms the finding of the three sufficient configurations above. The conditions RES, FUNCT and MEMBER are most important for obtaining access. This can also be concluded from the sufficient configurations, as in row 2 and 3 EUR and/or AGE are negated. Yet, the outcome did occur. This means EUR and AGE can contribute to obtaining access but are not central parts of the solution.

5.3 Truth Table Analysis

Above the sufficient configurations that were deduced from the truth table were analyzed. Sufficient configurations can also be analyzed differently: through the truth table analysis. The truth table analysis is an interesting method to interpret the results when the truth table shows many configurations that are sufficient to produce the outcome. However, this data set showed only three sufficient configurations, which is why the analysis of sufficient configurations and the truth table analysis are rather similar. However, both analyses were conducted to improve the understanding of the results in general. The section below explains the steps in the truth table analysis and interprets the results.

To do a truth table analysis, the researcher must first decide which of the 16 empirically observed rows to include in the logical minimization process (see Table 19 for

the truth table). Logical minimization means that the configurations are written down as formulas using Boolean algebra (Schneider & Wageman, 2012). The Quine-McCluskey algorithm, which has its basis in Boolean algebra and set theoretics, then logically eliminates the conditions that are irrelevant for producing the outcome which in the end leaves the simplest configuration that is sufficient to produce the outcome (Schneider & Wagemann, 2012). Deciding which rows to include in the minimization process is done by taking the raw consistency level of a minimum of 0.75. A raw consistency level of 0.75 is generally accepted and is also used in this thesis. The three sufficient configurations all have a raw consistency of 0.75 or higher. Thus, no rows were eliminated in this process.

Next, the Standard Analysis is done which produces three different types of solutions: the complex, parsimonious and intermediate solutions. The different solutions make assumptions about what to do with the 16 logical remainders (empirically unobserved configurations). All three are explained below and the solution to use for analysis and interpretation is chosen.

5.3.1 Complex Solution

In this thesis, the goal is to find the configurations that do produce access (AC), as opposed to not having access (~AC). The complex solution makes no assumptions at all about the logical remainders (Schneider & Wagemann, 2012, p. 164). This means that whenever AC is 0, that row is insufficient to produce the outcome, but it can also be insufficient for ~AC. This thus shows that asymmetry is assumed and not having access should be analyzed separately. The complex solution does not include any of the rows that were not empirically observed. The complex solution is therefore always a subset of the parsimonious and intermediate solution (Schneider & Wagemann, 2012, p. 165). The complex solution thus only presents solutions that are present in the data set. However, oftentimes the researcher knows more about theoretical bases of the sets than can be brought to the software as input. The complex solution (Appendix 8) is therefore less interesting to analyze, as it does not include all information that is available to the researcher.

5.3.2 Parsimonious Solution

The parsimonious solution shows the 'simplest' configuration that produces the outcome. This means that it shows the solution that includes the least number of conditions of sets (for

example: A and ~A are each a different condition of the set A) and the least amount operator links (AND or OR) (Schneider & Wagemann, 2012). All rows can thus be assigned a level of parsimony and the software shows the most parsimonious one. The parsimonious solution is also based only on the information within the data set. Especially in this thesis with few sufficient configurations, the parsimonious solution is not very interesting to analyze. Therefore, the intermediate solution is explained and analyzed below.

5.3.3 Intermediate Solution

The intermediate solution is the only solution of the three that includes information that is available to the researcher about the theoretical background of the sets. To produce the intermediate solution, it is required to give input to the software about the assumptions regarding the sets. As already shown above, 16 of the possible configurations are not empirically observed, meaning they do not have any cases assigned to them. Undoubtedly, this does not mean that these remainders, if they were empirically observed, would not produce the outcome. The intermediate solution solves this problem of unobserved configurations by asking the researcher what the theoretical expected direction of the set would be (Schneider & Wagemann, 2012). In this thesis, all sets are assumed to produce a higher amount of access if the sets are present, as opposed to absent.

To increase understanding of the results, the theoretical argument is repeated here per set. From these arguments the theoretical expected direction is deduced. First, the EUR-set represents the level of Europeanness of an interest group. Based on former research, it is theorized that the more an interest group represents European interests, the more access they have, as the Commission needs information that can form a basis for good policies for the entire Union. Second, the AGE-set refers to the age of an interest group. It is theorized that the older an organization is, the more time it has had to establish relationships between itself and the Commission. Furthermore, older organizations have better established rules and procedures within their own organizations. Thus, the expected direction for AGE is that the older an organization is the more access it enjoys. Third, the RES-set refers to an interest groups' resources. As found previously, the more resources an interest group has, the more access it enjoys. Fourth, the FUNCT-set refers to an interest groups' functional differentiation, meaning its differentiation between departments or units. If a special unit is assigned to do one particular task or research a particular branch of policy, it is expected to produce more valuable information for the Commission and thus enjoys more access. Fifth,

the MEMBER-set represents an interest groups' size of constituency. Representing a broader constituency is theorized to produce information that is supported by a large portion of the member companies and therefore creates more access. Concluding, the higher a case scores on each set, the more access it is expected to produce. Hence, all sets get assigned 'present' in the software as the theoretical expected direction.

After giving input about the directional expectation, the software searches for conditions that can be dropped according to Boolean logic. However, now that the directional expectation is known, the software only drops conditions if they are in line with the directional expectation (Schneider & Wagemann, 2012). For example, if ~EUR is eligible to be dropped from the solution, and the presence of EUR is expected to contribute to the outcome, then ~EUR can be dropped (Schneider & Wagemann, 2012, p. 172).

The intermediate solution (Figure 6 below) shows one configuration that is sufficient to produce the outcome: membership, functional differentiation and resources are sufficient to produce access. The consistency of this configuration is 0.86. Therefore, one can conclude that if an interest group has a considerably high score on membership, functional differentiation and resources, it is likely to be sufficient to gain access to the Commission. This thus confirms our analysis of the XY-plots above, that the sets AGE and EUR play a lesser role in obtaining access to the Commission than do MEMBER, FUNCT and RES.

Lastly, the solution coverage score of the intermediate solution is analyzed. Coverage indicates how much of the outcome access is explained by the configuration. The coverage score of MEMBER*FUNCT*RES is 0.46. This means that 46% of the access in the cases in this data set is explained by these factors. Theoretically there is no minimum score on coverage for a configuration to be important. The topic that this thesis researches, interest groups' access to the Commission, is a complex societal phenomenon. Many factors play into an interest group having access or not and it is difficult to include all factors in one study. Therefore, the conclusion that membership, functional differentiation and resources together explain 46% of the interest groups' access to the Commission is a significant finding. Hence, concluding from the analysis an interest groups' number of member companies, number of units that indicate functional differentiation and amount of resources are important factors when trying to obtain access to the Commission.

```
--- INTERMEDIATE SOLUTION ---
frequency cutoff: 1
consistency cutoff: 0.760596
Assumptions:
MEMBER (present)
FUNCT (present)
RES (present)
AGE (present)
EUR (present)

                        raw         unique
                      coverage     coverage    consistency
                     ----------   ----------   ----------
MEMBER*FUNCT*RES      0.467672     0.467672     0.860135
solution coverage: 0.467672
solution consistency: 0.860135
```
Figure 6: Intermediate Solution Original Data Set

5.4 Necessary Conditions

To find necessary conditions is generally rare in fsQCA (Schneider & Wagemann, 2012). Also in the XY-plots shown previously, none of the sets in this thesis are found to be completely necessary to produce access. For a condition to be necessary, its membership score in that condition must be bigger than that in the outcome, meaning the condition is a superset of the outcome (Schneider & Wagemann, 2012). In the XY-plot this would mean that, if a condition is perfectly necessary (as opposed to necessary to a certain degree), all cases are below the diagonal. We can analyze to what degree the condition is a superset of the outcome using the consistency score of the condition, which must be bigger than the outcome ($X <= Y$). The consistency scores of $X <= Y$ of all conditions are shown in Table 20 below.

Condition	Consistency $X <= Y$ ($Y = AC$)
EUR	0.31
AGE	0.59
RES	0.83
FUNCT	0.74
MEMBER	0.74

Table 20: Consistency Scores All Sets (X) <= Y (AC)

If consistency is high (0.9 generally accepted in fsQCA theory) on a condition, that condition can be seen as a necessary condition (Schneider & Wagemann, 2012). Out of all the conditions in this thesis, RES has the highest consistency (0.83) and comes closest to the 0.9

score. Hence, it can be argued that an interest groups' amount of resources are 'most' necessary to gain access.

5.5 Robustness Tests

Robustness tests of the results can be done in several ways in fsQCA. Configurations that are sufficient are robust if they have similar necessary and sufficient conditions, and if consistency and coverage are roughly the same when changes are made in the data set (Schneider & Wagemann, 2012, p. 285). This thesis tests the robustness of the results in four ways: first the set EUR is dropped from the analysis, second several cases are dropped, third the consistency levels are increased and lastly the item 'expert groups' is dropped from the measurement of access.

5.5.1 Dropping EUR-set

The EUR-set is dropped for several reasons. Most of the cases in the sample are national associations and represent national interests at the EU. Therefore, only a few cases score 0.5 or 1 on this set, as the calibration is done to measure the 'level of Europeanness'. Making changes in this calibration would be a way to check for robustness. However, the calibration of this set cannot be changed with this sample. The conclusion from this data simply is that most associations concerning insurance are representatives of national interests. There is no different cut off point or threshold that can be changed. Therefore, dropping this set from the analysis can be a robustness test. If dropping this set drastically changes the solutions and their consistency and coverage the results above would not be robust.

First the software was re-run with the 37 cases, but without the EUR-set. In the analysis above both the sufficient conditions and truth table analysis are done. For this robustness test, only the intermediate solution is analyzed, because the two analyses are similar as explained above. After dropping the EUR-set the intermediate solution in Figure 7 is produced.

```
--- INTERMEDIATE SOLUTION ---
frequency cutoff: 1
consistency cutoff: 0.795699
Assumptions:
MEMBER (present)
FUNCT (present)
RES (present)
AGE (present)
                      raw          unique
                   coverage       coverage    consistency
                  ----------     ----------   ----------
MEMBER*FUNCT*RES   0.467672       0.467672      0.860135
solution coverage: 0.467672
solution consistency: 0.860135
```

Figure 7: Intermediate Solution after Dropping EUR

This solution confirms the robustness of the first analysis. Again, the conditions MEMBER, FUNCT and RES are part of the solution and are sufficient to produce access. Since the solution stays the same, both consistency and coverage levels are also the same. Hence, no drastic changes occur when dropping the EUR-set. This means the results from the first analysis can be deemed robust.

5.5.2 Increased Consistency Level

The next way to test for robustness of the results is to change the consistency or coverage level (Schneider & Wagemann, 2012). The original set of 37 cases, including the EUR-set, is used again. The consistency level is increased to 0.77. By taking a consistency level of 0.77, row 3 is not included in the analysis (see Table 19 for the truth table). The intermediate solution that follows is shown in Figure 8 below.

```
--- INTERMEDIATE SOLUTION ---
frequency cutoff: 1
consistency cutoff: 0.782946
Assumptions:
MEMBER (present)
FUNCT (present)
RES (present)
AGE (present)
EUR (present)
                         raw          unique
                      coverage       coverage    consistency
                     ----------     ----------   ----------
MEMBER*FUNCT*RES*AGE  0.278392       0.278392      0.831832
solution coverage: 0.278392
solution consistency: 0.831832
```

Figure 8: Intermediate Solution Original Data Set and Consistency Level of 0.77

This solution makes sense compared to the original results. Row 3 did not have AGE in its configuration and therefore contradicted the necessity of AGE. Therefore, AGE was not a part of the original intermediate solution. Now that row 3 has been left out of the analysis, AGE is included in the solution, because in both row 1 and 2 AGE is part of the configuration. The coverage of this solution is significantly lower (from 0.47 in the original configuration of MEMBER*FUNCT*RES, to 0.28). This is a logical consequence from adding a condition to the configuration: fewer cases show this particular configuration and therefore less of the outcome is covered by this solution.

5.5.3 Dropping Expert Groups

The final way the results are tested for robustness is by dropping item 2 from the measurement of access (expert groups). Most of the interest groups scored very low on participation in expert groups, therefore many of the fuzzy scores were 0. By dropping this item, the normalized sum of the fuzzy scores are higher than when expert groups were included. The original set of 37 cases was used again. For comparison, Table 21 below shows the normalized fuzzy scores with item 2 (column 2) and without (column 3).

Interest Group	With Expert Groups	Without Expert Groups
ABAM BVT	0	0
AIFI	0	0
AIPB	0,22	0,33
AMICE	0,6633333333	0,665
ANIA	0,44	0,66
Assosim	0,11	0,165
ASSURALIA	0,3333333333	0,5
BIBA	0	0
CAP	0	0
CLLS	0,11	0,165
CML	0	0
DAI	0,33	0,495
EAEE	0,11	0,165
ECAR	0,22	0,33
FDATA	0,11	0,165

FFA	0,5533333333	0,83
FFI	0,6666666667	1
FINNOR	0,4433333333	0,665
FLA	0,4433333333	0,665
FNG	0,11	0,165
FORS	0	0
GDV	1	1
ICISA	0,22	0,33
IE	1	1
II	0,44	0,66
ILAG	0	0
ILPA	0,22	0,33
IPD	0,22	0,33
IUMI	0,22	0
MIA	0,11	0,165
RAA	0,11	0,165
SEE	0,33	0,33
SVENFÖR	0,11	0,165
SZZ	0	0
VVO	0,22	0,33
WINDEU	0,8866666667	1
WNA	0	0

Table 21: Fuzzy Scores AC with and without Expert Groups

The fuzzy scores in the second column were replaced by the fuzzy scores in the third column and run through the software. Again, a minimum of one case per configuration and a consistency level of 0.75 was chosen. This produced the truth table below (Table 22).

Row	EUR	AGE	RES	FUNCT	MEMBER	AC	Number	Raw Consist.
1	1	1	1	1	1	1	1	1
2	0	0	1	1	1	1	1	0.828179
3	0	0	1	0	1	1	2	0.816076
4	0	1	1	1	1	1	1	0.806202
5	0	0	1	1	0	0	3	0.658904
6	0	1	1	1	0	0	3	0.64539
7	0	1	1	0	0	0	1	0.603896
8	1	0	0	0	0	0	2	0.497863
9	0	0	1	0	0	0	2	0.479701
10	0	0	0	1	1	0	1	0.448795
11	0	0	0	0	1	0	1	0.434944
12	0	1	0	1	0	0	1	0.406459
13	0	1	0	0	0	0	2	0.374718
14	0	0	0	1	0	0	2	0.339759
15	0	1	0	1	1	0	1	0.293255
16	0	0	0	0	0	0	3	0.285326

Table 22: Truth Table without Expert Groups

The interesting result from this robustness test, is row 3. Row 3 only includes the conditions RES and MEMBER, and not FUNCT. Yet, this configuration is sufficient for producing access with a relatively high consistency score of 0.82. This indicates that the results from the original data set are not completely robust. Therefore, the intermediate solution from this new truth table (Figure 9 below) is produced and analyzed.

```
--- INTERMEDIATE SOLUTION ---
frequency cutoff: 1
consistency cutoff: 0.806202
Assumptions:
MEMBER (present)
FUNCT (present)
RES (present)
AGE (present)
EUR (present)
                raw         unique
             coverage     coverage     consistency
            ----------   ----------   ----------
MEMBER*RES   0.593187     0.593187     0.918182
solution coverage: 0.593187
solution consistency: 0.918182
```

Figure 9: Intermediate Solution without Expert Groups

The intermediate solution indeed shows that only MEMBER and RES are important to produce access. The solution consistency is high: 0.92. This robustness test thus shows that the FUNCT-set is less important than MEMBER and RES to produce access.

In conclusion, the conditions membership and resources are the most important internal factors an interest group should consider when trying to get access to the Commission.

6. Discussion

This thesis researched which combination of internal factors for interest groups enables them to access the Commission. In this chapter the results are discussed considering the theoretical background. First, each set is discussed briefly, whereafter several individual cases are discussed and lastly limitations to the theories and methods are examined.

6.1 Discussion of the Sets

The topic of access to the Commission has previously not been studied using the fsQCA method. Each set included in this thesis has been researched separately. Therefore, expectations on the effect of each set individually could be made, however which combination of sets is most important to create access was difficult to theorize. Therefore, this thesis adds to the existing literature by showing the importance of each factor individually and in combination with each other. A high score on the factors financial resources and membership were found to be a likely combination of factors to create access. In the next paragraphs each sets' position in the theoretical literature is discussed and how the results confirm or contradict the theories.

First, the EUR-set referred to the level of Europeanness of the interest groups in the insurance sector. Theoretically it was expected that the more the interest group represents interests from a European level, the more access they would have. However, the results of this thesis showed that this factor was not important in obtaining access. Eising's (2007) argument was based on the logic that national associations become a member of the European

level associations instead of representing their interest in the EU themselves. Therefore, European level associations were expected to have more access. Yet, in this data set this argument did not hold. It was found that in the insurance sector still many national associations are active in Brussels. The result of the level of Europeanness not being important is therefore a logical consequence. It was also found during data collection that many of the national associations are also members of Insurance Europe, the European level association for insurance. Hence, national interests are represented both per individual Member State as also through Insurance Europe.

Second, the AGE-set was based on the argument that repeated, long-term interaction creates good relationships both within an organization as between organizations. Older organizations have had the time to establish these relationships and prove their worth to the policy-makers. This argument does not hold in this thesis. Even the two youngest associations (FFA and II, respectively 5 and 7 years old) still score relatively high on access (normalized fuzzy scores in the original measurement are respectively 0.56 and 0.44).

Third, the RES-set follows the logic of having more resources, which means being able to employ more qualified personnel, which creates valuable information and therefore enables more access. Also in the results of this thesis, resources were found to be an important factor for gaining access.

Fourth, the FUNCT-set refers to the functional differentiation of an interest group, or put differently, the amount of units certain aspects of the insurance branch are divided across. This was based on Albareda & Braun (2019) findings that more units or departments imply more specialized personnel, which means they are better able to provide valuable information to the Commission and therefore gain more access. This set was part of the final solution in the first results of this thesis and suggested that functional differentiation is an important aspect for obtaining access. However, the robustness test countered this conclusion. A different measurement of access led to the factor functional differentiation not being part of the final solution. This indicates that functional differentiation can contribute to obtaining access but is not as important as resources and membership.

Fifth, the MEMBER-set refers to the number of companies that are a member of the interest group. Based on Fraussen & Beyers (2015) and Junk (2018) having a large number of members indicates a large constituency, which is important for the Commission as this

signals broad political support for the information provided by that interest group. The expectation that a bigger membership leads to more access is found to be true and an important factor in the final solution. This is in line with previous findings. However, these results need to be put in a broader context: Member States that are bigger in population or economy, most likely have more insurance companies, and therefore the membership of a national association in a large economy is likely to be bigger nevertheless, compared to smaller Member States. Membership was a part of the final solution and is an important factor for interest groups to consider. However, due to the argument of economic size above, this set is least reliable as the economic size of the Member States has not been taken into consideration. In future research this should be considered when using this indicator for measuring constituencies.

6.2 Case Level Discussion

Several points about the cases included in this thesis must be made. First, as already mentioned above, Insurance Europe has many of the national associations as its members. Insurance Europe is thus an outsider in the dataset because of this. However, it was included in the research because of its importance as a representative of insurance interests in the entirety of the EU. The scores of Insurance Europe on the different sets is also striking: Insurance Europe scores 1 on all sets, including access, with a consistency level of 1. This indicates that Insurance Europe is the biggest interest group in the insurance sector and should be viewed as such. As Insurance Europe assembles many interests from many national associations, this interest group would make a good case for further qualitative research, as certain questions remain unanswered in this thesis: are the biggest national association members the ones whose interests are represented most? Does Insurance Europe only represent the interests of Europe as one entity or does it consider national preferences? Due to these factors it is important to point out Insurance Europe as an irregular case in this research.

Next, the significance of the trade-offs made in the sample of cases needs to be addressed. As explained previously, this thesis included interest groups that fall in the category 2B in the Transparency Register (category 2B includes trade and business associations). During data collection, it was noted that many individual companies (category 2A) are members of several associations, while in addition they represent themselves at the

EU as well. Several companies that sparked interests are: Allianz, AXA, Associazione Bancaria Italiana, Credit Agricole, Invest Europe and UNI Europa. These companies all had between 14 and 23 meetings with the Commission. According to the scores in this thesis, that is a fair amount for any company or association. As the difference between associations and individual companies was not researched in this thesis, future research could consider taking this into account and explain the difference in access between the two categories and what this means for the representation of interests.

6.3 Limitations

There are several limitations to the theories surrounding access and the methods used to measure them. First, as explained previously, access does not relate linearly to influence. After all, interest groups try to access the Commission to influence the policies they produce. In the literature it is found that measuring influence is difficult. This should however not mean the research community should avoid the subject in its entirety. Even though influence was not the focus of this thesis, it is important to point out that once interest groups have access, it is in no way certain their positions are taken into the policy-making process afterwards.

Another limitation regards the methods used to measure access. In the literature several ways to define and measure access have been found, such as the number of expert groups or committees an interest group participates in, the number or frequency of meetings with the Commission, the number of contributions to public consultations. Previous research has been done only measuring one of these items, as discussed in the operationalization of access. However, as was found during this thesis, many interest groups in the insurance sector have no meetings with the Commission at all and are not part of any expert groups. Public consultations is a slightly more commonly used method to present interests to the Commission. Still, studies that only measured one item (meetings with the Commission for example) to make claims about the amount of access an interest group has, seem invalid to a certain extent. There are other ways to access the Commission both formally and informally. Future research could use qualitative methods to control for the most used indicators to measure access the policy-makers.

7. Conclusion

The aim of this thesis was to research which combination of internal factors of an interest group are necessary or sufficient to obtain access to the Commission. The research question thus was: *'What combination of factors are necessary and/or sufficient for obtaining access to the European Commission by interest groups in the insurance sector?'* Five factors were taken into the fsQCA method: Europeanness, organizational age, financial resources, functional differentiation and membership. The results showed that Europeanness and organizational age are of relatively no importance when obtaining access. The combination of financial resources and membership is sufficient for obtaining access. The factor functional differentiation falls in between. No factors were found to be necessary, although financial resources scores relatively high on necessity and can therefore be concluded to be the most necessary out of the five factors researched.

In the discussion section, limitations to the theories on this topic have been mentioned. Several limitations to this thesis also need to be noted. First, for several cases data was not publicly available. This information could have been retrieved through direct contact with the interest groups. However, due to time constraints the interest groups were not contacted and several cases were dropped.

Second, the focus of this thesis is on the insurance sector interest groups. Therefore, the results are not easily generalized to all interest groups seeking to access the policy-makers in the EU. Still, the theoretical arguments for the two most important factors, resources and membership can apply to any sector or interest groups. Further research could thus control for the findings of this thesis by taking a broader sample or a different sector of interest representation.

Third, the calibration of financial resources, membership, and the first and third item of access (meetings with the Commission and contributions to public consultations) are partially based on practical arguments rather than theoretical knowledge. This affects the internal validity of the research, meaning the data of these sets might not accurately represent the effect of resources and membership on access. However, to counter this internal invalidity, the author chose a broader sample (the entire insurance sector interest groups) to calculate averages, instead of calibrations based on the sample under research. This makes the

calibration more valid, however, in future research calibrations based theoretical arguments would improve the internal validity of the results.

Fourth, the access-set's fuzzy scores rely heavily on the third item of measurement, public consultations. Many of the interest groups in the sample had no meetings with the Commission (item 1) and no participation in expert groups (item 2). Item 3, public consultations, did not measure the access *granted* by the Commission, but is available to any group that wants to represent their interests. This thesis has not distinguished between access *granted* or not. The variables Europeanness, organizational age, functional differentiation and membership all have their theoretical arguments based on access being granted. An interest group changing any of these variables would not matter for obtaining access via public consultations. The variables resources, however, does fit this measure of access. An interest group needs at least some financial resources to employ staff to produce contributions to the public consultations. Previous research has also used the meetings with the Commission and the participation on expert groups to measure interest groups' access to the policy-makers. As these two items turned out to be 0 in many of the cases in this research, the author questions the validity of these measurements. Although perhaps in other policy areas, interest groups meet more with the Commission and participate more on expert groups than in the insurance sector. Future research should acknowledge the limitations of these indicators for measuring access. Future research could show how interest groups in reality access the policy-makers by using qualitative methods and create more valid indicators to measure access.

Fifth, fsQCA allows to take into account several variables, however, not all major variables were researched. The trade-off was made to research factors internal to the interest groups. However, there are also external factors that can play a significant role in an interest groups' access. Future research could combine external and internal to create better understanding of how interest groups access the EU policy-makers.

The results from this thesis bring forth some practical recommendations for interest groups to consider when trying to access the Commission. As has been shown before and is confirmed by this thesis, financial resources play an important part in gaining access. Increasing financial resources increases the chances of gaining access. Finally, the variable membership was found to be of significance. Interest groups could try to increase their constituency and signal their large basis of political support to the policy-makers to increase chances to gain access.

Bibliography

Albareda, A. & Braun, C. (2019). Organizing Transmission Belts: The Effect of

Organizational Design on Interest Group Access to EU Policy-making. *Journal of Common Market Studies, 57*(3), 468-485. DOI: 10.1111/jcms.12831

Berg-Schlosser, D., De Meur, G., Rihoux, B. & Ragin, C.C. (2012). Qualitative Comparative

Analysis (QCA) as an Approach. In: *Configurational Comparative Methods: Qualitative Comparative Analysis (QCA) and Related Techniques*. Thousand Oaks: SAGE Publications, Inc. DOI: https://dx.doi.org/10.4135/9781452226569

Binderkrantz, A.S. (2009). Membership Recruitment and Internal Democracy in Interest

Groups: Do Group–Membership Relations Vary Between Group Types? *West European Politics, 32*(3), 657 - 678. DOI: 10.1080/01402380902779162.

Bouwen, P. (2002). Corporate lobbying in the European Union: the logic of access. *Journal

of European Public Policy, 9*(3), 365 – 390.

Bouwen, P. (2004). Exchanging access goods for access: A comparative study of business

lobbying in the European Union institutions. *European Journal of Political Research, 43*, 337-369.

Buttolph Johnson, J. & Reynolds, H.T. (2005). *Political Science Research Methods: Chapter

6*. Washington, D.C.: QC Press.

Carmines, E.G. & Zeller, R.A. (1979). *Introduction*. In: Reliability and validity assessment.

Beverly Hills: SAGE Publications.

Coen, D. & Katsaitis, A. (2013). 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, 20*(8), p. 1104-1119. DOI: 10.1080/13501763.2013.781785

Das, U. S., Davies, N. & Podpiera, R. (2003). *Insurance and Issues in Financial Soundness*.

IMF Working Paper, WP/03/138. Retrieved 23 June 2021 from: https://www.imf.org/external/pubs/ft/wp/2003/wp03138.pdf

Dür, A. & De Bièvre, D. (2007). The question of interest group influence. *Journal of Public Policy, 27*(1), 1–12.

Dür, A. (2008). Measuring Interest Group Influence in the EU. A Note on Methodology. *European Union Politics, 9*(4), p. 559 - 576. DOI: 10.1177/1465116508095151

ECB (2009). *Financial Stability Review, December 2009*. Retrieved 23 June 2021 from: https://www.ecb.europa.eu/pub/pdf/fsr/art/ecb.fsrart200912en_05.pdf?d92c521966d42 30d00f941821cb4e1cc

EIOPA (2020, December 17). *Solvency II review: A balanced update for challenging times*. Retrieved 18 February 2020, from https://www.eiopa.europa.eu/content/solvency-ii-review-balanced-update-challenging-times_en

Eising, R. (2007). Institutional context, organizational resources and strategic choices explaining interest group access in the European Union. *European Union Politics, 8*(3), 329 - 362.

European Commission (n.d. a). *Expert groups, comitology and other committees*. Retrieved 4 May 2021, from https://ec.europa.eu/info/business-economy-euro/banking-and-finance/regulatory-process-financial-services/expert-groups-comitology-and-other-committees_en

European Commission (n.d. b). *Transparency register*. Retrieved 4 May 2021, from https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/transparency-register_en

European Commission (n.d. c). *What is the Economic and Monetary Union? (EMU).*

Retrieved 18 February 2021, from https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/economic-and-monetary-union/what-economic-and-monetary-union-emu_en

European Commission (n.d. d). *Who is expected to register?* Retrieved 21 June 2021, from https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=WHOS_IS_EXPECTED_TO_REGISTER

Financial Times (2020, December 17). *EU regulator launches revamp of insurance rules.* Retrieved 18 February 2021, from https://www.ft.com/content/77762dc0-0ba6-4819-af43-598e54f3ad98

Fraussen, B. & Beyers J. (2015). Who's in and who's out?: Explaining access to policymakers in Belgium. *Acta Politica, 51*(2), 214-236. DOI:10.1057/ap.2015.9.

Harsch, D. (2001). Since World War II. In: P.N. Stearns (Ed.), *Encyclopedia of European Social History* (pp. 229-242). Michigan: Gale.

Hix, S. & Hoyland, B. (2011). *The Political System of the European Union*. London: Palgrave Macmillan.

Jiménez-Buedo, M.J. & Miller, L.M. (2010). Why a Trade-Off? The Relationship between the External and Internal Validity of Experiments. *Theoria, An International Journal for Theory, History and Foundations of Science, 25*(3), 301-321).

Junk, W.M. (2018). Representation beyond people: Lobbying access of umbrella associations to legislatures and the media. *Governance, 32*(3), p. 313 - 330.

Klüver, H. (2012). Informational Lobbying in the European Union: The Effect of Organisational Characteristics. *West European Politics, 35*(3), 491–510.

Klüver, H., Braun, C. and Beyers, J. (2015). Legislative lobbying in context: towards a

conceptual framework of interest group lobbying in the European Union. *Journal of European Public Policy, 22*(4), 447–61.

Koeppl, P. (2000). The acceptance, relevance and dominance of lobbying the EU

Commission - A first-time survey of the EU Commission's civil servants. *Journal of Public Affairs, 1*(1), p. 69 - 80.

Mahoney, C. (2007). Lobbying Success in the United States and the European Union.

Journal of Public Policy, 27(1), 35-56.

Panke, D. (2012). Lobbying Institutional Key Players: How States Seek to Influence the

European Commission, the Council Presidency and the European Parliament. *Journal of Common Market Studies, 50*(1), p. 129 - 150. DOI: 10.1111/j.1468-5965.2011.02211.x

Ragin, C.C. (1987). *The Comparative Method: Moving Beyond Qualitative and Quantitative*

Strategies. California: University of California Press.

Ragin, C.C. (2003). *Making Comparative Analysis Count*. Department of Sociology,

University of Arizona. Retrieved 9 May 2021, from http://www.compasss.org/wpseries/Ragin2003b.pdf

Rasmussen, A. (2014). The battle for influence: The politics of business lobbying in the

European Parliament. *Journal of Common Market Studies, 53*(2), 365–382.

Rasmussen, A. & Gross, V. (2015). Biased access? Exploring selection to advisory

committees. *European Political Science Review, 7*(2), 343-372. doi:10.1017/S1755773914000228

Saz-Carranza, A. & Ospina, S. (2010). The Behavioral Dimension of Governing

Interorganizational Goal-Directed Networks—Managing the Unity-Diversity Tension. *Journal of Public Administration Research and Theory, 21*, 327-365. DOI:10.1093/jopart/muq050

Schmitter, P.C. & Streeck, W. (1999). The Organization of Business Interests: Studying the Associative Action of Business in Advanced Industrial Societies. *MPIfG Discussion Paper*, (99/1).

Schneider, C.Q. & Wagemann, C. (2012). *Set-Theoretic Methods for the Social Sciences: A Guide to Qualitative Comparative Analysis (Strategies for Social Inquiry)*. Cambridge: Cambridge University Press. DOI: 10.1017/CBO9781139004244

Wagemann, C. & Schneider, C.Q. (n.d.). *Standards of Good Practice in Qualitative Comparative Analysis (QCA) and Fuzzy-Sets*. Retrieved 23 April 2021, from http://www.compasss.org/wpseries/WagemannSchneider2007.pdf

Appendices

Appendix 1 - List of Websites Where Data for FUNCT is Found

Interest group	Link to website where FUNCT is found
ABAM BVT	https://abambvt.be/nl/organisation-3/technische-dienst/cargo.html
ABI	https://www.abi.org.uk/about-the-abi/executive-team/
AIFI	https://www.aifi.it/aifi/commissioni/
ANIA	https://www.ania.it/commissioni-permanenti#chi-siamo
ASSOSIM	https://www.assosim.it/comitati-permanenti/
ASSURALIA	https://www.assuralia.be/nl/over-assuralia/bestuur/afdelingen
BIBA	https://insurance.biba.org.uk/governance
CLLS	https://www.citysolicitors.org.uk/clls/who-we-are/committee-members/
DAI	https://www.verzekeraars.nl/over-het-verbond/wat-we-voor-leden-doen
FFI	https://www.finanssiala.fi/en/about-us/
FLA	https://www.fla.org.uk/about-us/fla-staff/
ILPA	https://ilpa.org/committees/
IPD	https://www.forsikringogpension.dk/om-os/hvem-er-vi/
ISICA	https://www.icisa.org/icisa/#who-is-who
IUMI	https://iumi.com/about/structure
MIA	https://maltainsurance.org/about-us/council-members-chairpersons/
SZZ	https://www.zav-zdruzenje.si/en/association/organization/#bzk

Appendix 2 – Calculation of Members of Insurance Europe

Country	Association	Members
Austria	Versicherungsverband Österreich	120
Belgium	Assuralia	90
Bulgaria	Association of Bulgarian Insurers	28
Croatia	Croatian Insurance Bureau	16
Cyprus	Insurance Association of Cyprus	30
Czech Republic	Czech Insurance Associations	28

Denmark	Insurance & Pension Denmark	82
Estland	Eesti Kindlustrusseltside Liit	17
Finland	Finance Finland	314
France	French Insurance Federation	245
Germany	GDV	460
Greece	Hellenic Association of Insurance Companies	47
Hungary	Magyar Biztositok Szovetsege	22
Iceland	Samtök Fjármálafyrirtækja (SFF)	25
Ireland	Insurance Ireland	133
Italy	Ania	131
Latvia	Latvian insurers associations	14
Liechtenstein	LVV	18
Luxembourg	ACA	51
Malta	Mia	18
Netherlands	DAI	159
Norway	Finance Norway	240
Poland	PIU	80
Portugal	APS	19
Romania	Unsar	19
Slovakia	slaspo	
Slovenia	slovensko zavarovalno zdruzenje	21
Spain	Unespa	200
Sweden	Svensk Försäkring	49
Switserland	asa	70
Turkey	Insurance Association of Turkey	66
UK	ABI	217
UK	IUA	
UK	Lloyd's	
Total		**3029**

Appendix 3 – Calculation of Members of IUMI

Country	Association	Members
Albania	Albanian Association of Marine Insurers	
Australia	Insurance Council of Australia Ltd.	135
Austria	Verband der Versicherungsunternehmen	120
Belgium	Royale Association Belge des Assureurs Maritimes (ABAM)	15
Bermuda	Bermuda Association	
Canada	The Canadian Board of Marine Underwriters	18
	The Nordic Association of Marine Insurers (CEFOR)	14
China	Shanghai Institute of Marine Insurance	26
Chinese Taipei	The Non-Life Insurance Association of Chinese Taipei	22
Croatia	Hrvatski ured za osiguranje - Croatian Insurance Bureau	16
Cyprus	Insurance Association of Cyprus	30
Denmark	Insurance & Pension	82
Egypt	Insurance Federation of Egypt	39
Finland	Federation of Finnish Financial Services	199
France	Fédération française de l'assurance (FFA)	245
Germany	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	460
Greece	Hellenic Association of Insurance Companies	47
Hong Kong	The Hong Kong Federation of Insurers Marine Insurance Association	
India	General Insurance Council India	
Israel	Israel Insurance Association	
Italy	Associazione Nazionale tra le Imprese Assicuratrici (ANIA)	131
Japan	The General Insurance Association of Japan	28
Kazakhstan	Eurasia Insurance Company JSC	
Malaysia	Persatuan Insuran am Malaysia General Insurance Association of Malaysia	26
Morocco	F.M.S.A.R. Fédération Marocaine des Sociétés	

	d'Assurances et de Réassurance	
Myanmar	Myanmar Insurance Association (MIA)	
Netherlands	Dutch Association of Insurers	159
New Zealand	Insurance Council of New Zealand Inc.	30
Nigeria	Nigerian Insurers Association	57
Philippines	Philippine Insurers and Reinsurers Association (PIRA)	
Poland	TUiR Warta S.A.	
Republic of Korea	General Insurance Association of Korea	15
Russian Federation	Russian Union of Marine Insurers (RUMI)	
Singapore	General Insurance Association of Singapore	39
Slovenia	Slovenian Insurance Association	21
South Africa	SAIA The South African Insurance Association	56
Spain	Unión Española de Entidades (UNESPA)	200
Sweden	Insurance Sweden	49
Switzerland	Swiss Insurance Association	70
Thailand	Thai General Insurance Association (TGIA)	
Turkey	Association of the Insurance, Reinsurance and Pension Companies of Turkey	66
UAE	Emirates Insurance Association	8
UK	Lloyd's Market Association (LMA)	
UK	International Underwriting Association (IUA)	
USA	American Institute of Marine Underwriters	38
Total		**2461**

Appendix 4 – Calculation of Average Number of Meetings (AC Item 1)

Interest group	Number of meetings with Commission
Actuarial Association of Europe (AAE)	4
Aedes vereniging van woningcorporaties (Aedes)	4
AEGON N.V.	5
AEMA GROUPE	0
ageas SA/NV (ageas)	2
AIG Europe S.A. (AIG)	4
ALAN	1
Allgemeine Ortskrankenkasse-Bundesverband (AOK-BV)	0
Alliance of Lithuanian Consumer Organizations (LVOA-ALCO)	0
Allianz SE (Allianz Group)	19
AMF Pensionsförsäkring AB (AMF Pension)	0
AMICE - Association of Mutual Insurers and Insurance Cooperatives in Europe (AMICE)	5
ANAT - NATIONAL ASSOCIATION OF TRAVEL AGENCIES - ROMANIA (ANAT)	0
Arbeitsgemeinschaft berufsständischer Versorgungseinrichtungen e.V. (ABV)	0
Arch Insurance (EU) dac (Arch EU)	1
ASOCIATIA CONSUMERS UNITED/CONSUMATORII UNITI (ACU)	0
Assicurazioni Generali S.p.A	15
Association Européenne des Cadres de l'Assurance - AECA - European Federation of Executives and Managerial Staff of the Insurance Sector (AECA-CEC)	0
Association Internationale de la Mutualité (AIM)	12
Association of Bermuda Insurers and Reinsurers (ABIR)	1
Association of British Insurers (ABI)	4
Associazione Bancaria Italiana (ABI)	23
Associazione Intermediari Mercati Finanziari - ASSOSIM	0

(Assosim)	
Associazione Italiana del Private Equity, Venture Capital e Private Debt (AIFI)	0
Associazione Italiana Private Banking (AIPB)	0
Associazione Nazionale fra le Imprese Assicuratrici (ANIA)	6
Assuralia, beroepsvereniging van verzekeringsondernemingen (Assuralia)	0
Athenora Consulting	6
Aviva Plc (Aviva)	31
AXA	14
AXA Investment Managers (AXA IM)	4
Bank Gospodarstwa Krajowego (BGK)	3
BBDSZ Pénzügyi Ágazat Szakszervezeti Szövetsége (BBDSZ)	0
Belron International Limited	0
BIPAR - European Federation of Insurance Intermediaries (BIPAR)	0
British Insurance Brokers' Association (BIBA)	0
Bund der Versicherten e.V. (BdV)	0
BZB-Fedafin (BZB-Fedafin)	0
Caisse centrale de la Mutualité Sociale Agricole (CCMSA)	0
Caisse Nationale des Allocations Familiales (CNAF)	0
Campaign for the Freedom of the Automotive Parts and Repair Market (ECAR)	1
Caravan and Motorhome Club	0
Česká asociace pojišťoven (ČAP, CAP)	0
Cigna	1
City of London Law Society (CLLS)	0
Cluster Maritime Luxembourgeois asbl (CML)	0
Cooley LLP	0
Covéa	0
Crédit Agricole S.A.	20
Cross Border Benefits Alliance-Europe (CBBA-Europe)	0
Dachverband der österreichischen Sozialversicherungen (DVSV)	2
Danske Bank	7

Degroof Petercam Asset Management (DPAM)	1
Deutsche Aktuarvereinigung e.V. (DAV)	0
Deutsche Gesetzliche Unfallversicherung e.V. (DGUV)	2
Deutsche Sozialversicherung Arbeitsgemeinschaft Europa (DSVAE)	11
DNB Bank ASA (DNB)	2
Drones for Europe (D4E)	0
DWS Group GmbH & Co. KGaA (DWS)	1
Environmental Liability Solutions Europe Ltd. (ELS Europe)	0
European Blind Union (EBU)	9
European Captive Insurance and Reinsurance Owners Association (ECIROA)	0
European Federation of Patients' Associations for Anthroposophic Medicine (EFPAM)	0
European Forum of Deposit Insurers (EFDI)	0
European Insurance CFO Forum (CFO Forum)	0
European Microfinance Network aisbl (EMN aisbl)	9
European Organisation for Research and Treatment of Cancer (EORTC)	7
European Real Estate Forum (EREF)	0
European Social Insurance Platform AISBL (ESIP)	4
Fédération Européenne des Conseils et Intermédiaires Financiers (FECIF)	0
Fédération Française de l'Assurance (FFA)	8
Fédération Nationale de la Mutualité Française (FNMF)	0
Federation of European Risk Management Associations (FERMA)	2
Fidelity International (FIL)	6
Finance & Leasing Association (FLA)	1
Finance Norway (Finans Norge)	1
Finance Sector Union (FSU)	1
Financial Services Consumer Panel (FSCP)	1
Finanssiala ry - Finance Finland (FA - FFI)	13
FirstRand (FSR)	1

Forum Nachhaltige Geldanlagen (FNG)	0
Germanwatch	2
Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	35
GKV-Spitzenverband	0
Global Federation of Insurance Associations (GFIA)	0
Health Tourism Industry Partner (HTI)	0
Iceye Oy (Iceye)	1
IFM Investors (UK) Ltd (IFM Investors)	0
Industriens Pensionsforsikring A/S (Industriens Pension)	0
Institutional Limited Partners Association (ILPA) (ILPA)	5
Insurance & Pension Denmark (Forsikring & Pension) (IPD)	2
Insurance Europe (Insurance Europe)	54
Insurance Ireland	9
International association for the study of insurance economics (Geneva Association)	0
International Credit Insurance & Surety Association (ICISA)	0
International Federation of Freight Forwarders Associations (FIATA)	0
International Forum of Insurance Guarantee Schemes (IFIGS)	0
International Swaps and Derivatives Association (ISDA)	10
International Underwriting Association of London Limited (IUA)	1
International Union of Marine Insurance (IUMI)	0
Invest Europe (Invest Europe)	18
Investment & Life Assurance Group Limited (ILAG)	0
Italian Banking, Insurance and Finance Federation (FeBAF)	4
Kommission Arbeitsschutz und Normung (KAN)	0
Koninklijke Belgische Vereniging van Transportverzekeraars vzw - Royale Associaton Belge des Assureurs Maritimes asbl (ABAM BVT)	0
Korea Insurance Research Institute (KIRI)	0
Legal & General Group Plc (L&G)	4
Legal Protection International aisbl (LPI)	0
Liberty Mutual Insurance Group (LMIG)	0

Lloyds Banking Group plc	0
Lloyd's of London	6
M&G plc	0
MALTA INSURANCE ASSOCIATION (MIA)	0
Malta Union of Bank Employees (MUBE)	0
MAPFRE S.A.	0
Mediation Centre at the Croatian Insurance Bureau (CMHUO)	0
MERCI CHARITY BOUTIQUE (MCB)	0
MetLife Europe	0
Mn Services N.V. (MN)	1
Motor Insurers Bureau of Ireland (MIBI)	0
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen (Munich Re)	4
Mutuelle Générale de l'Education Nationale (MGEN)	1
National Farmers' Union (NFU)	9
National Institute for Health and Disability Insurance (NIHDI)	0
NATIXIS	7
NN Group N.V. (NN Group)	1
Nordic Financial Unions (NFU)	2
Norwegian Financial Services Complaints Boards (FinKN)	0
Pan-European Insurance Forum (PEIF)	3
PensioPlus (PensioPlus)	4
PHOENIX Pharma SE (PHOENIX group)	0
Ports and Terminals cvba (PortExpertise)	0
PostePay S.p.A.	0
Practical Action	0
PROEF (PROEF)	0
RAC Motoring Services (RAC)	0
Reinsurance Advisory Board (RAB)	0
Reinsurance Association of America (RAA)	1
RELX	19
S2 GRUPO DE INNOVACIÓN EN PROCESOS ORGANIZATIVOS, S.L.U. (S2 Grupo)	0

SCOR SE	1
Slovensko zavarovalno združenje (SZZ)	0
Social Economy Europe (SEE)	3
Stowarzyszenie Forum Recyklingu Samochodów FORS	0
Svensk Försäkring	1
Swiss Re Ltd.	13
Talanx AG (Talanx)	1
The Financial Data and Technology Association (FDATA)	1
The Fullilove Consulting Group (TFCG)	0
Transfrigoroute International (TI)	0
UNI Europa	20
Union Asset Management Holding AG (UMH)	1
UNIÓN ESPAÑOLA DE ENTIDADES ASEGURADORAS Y REASEGURADORAS (UNESPA)	3
Verband der Ersatzkassen e.V. (vdek)	0
Verband der Versicherungsunternehmen Österreichs / Austrian Insurance Association (VVO)	1
Verbond van Verzekeraars / Dutch Association of Insurers	1
Vienna Insurance Group AG Wiener Versicherung Gruppe (VIG)	1
Wellington Management International Limited (WMIL)	0
WindEurope	77
World Nuclear Association (WNA)	0
Zurich Insurance Company Ltd	15
ΈΝΩΣΗ ΑΣΦΑΛΙΣΤΙΚΩΝ ΕΤΑΙΡΙΩΝ ΕΛΛΑΔΟΣ (EAEE)	1
Average:	**3,81**

Appendix 5 – Selection of Expert Groups for AC-Set Item 2

Name expert group	Included in research?
Expert Group on Banking, Payments and Insurance	yes
High-Level Expert Group on Sustainable Finance	yes
Corporate Bond Market Liquidity	no
Cross-border redress in financial services	yes
Derivatives and Market Infrastructures Member States Working Group	no
European Crowdfunding Stakeholders Forum	no
European Post Trade Forum	no
Expert Group of the European Securities Committee	no
Expert Group on barriers to free movement of capital	no
Expert Group on intra-EU cross border investment environment	no
Expert Group on the evaluation of the IAS Regulation	no
Government Expert Group on Retail Financial Services	no
Government Expert Group on Mortgage Credit	no
Group of representatives of financial services employees (UNI Europa)	no
Payment Systems Market Expert Group	no
Securities Law Directive Member States Working Group	no

Appendix 6 – Sample of 162 Cases and Allocated (Sub)Category

Search item: 'insurance' → 162 hits (02-05-2021)	Category	Subcategory
Actuarial Association of Europe (AAE)	2	c
Aedes vereniging van woningcorporaties (Aedes)	2	d
AEGON N.V.	2	a
AEMA GROUPE	2	a
ageas SA/NV (ageas)	2	a
AIG Europe S.A. (AIG)	2	a
ALAN	2	a

Allgemeine Ortskrankenkasse-Bundesverband (AOK-BV)	6	
Alliance of Lithuanian Consumer Organizations (LVOA-ALCO)	3	
Allianz SE (Allianz Group)	2	a
AMF Pensionsförsäkring AB (AMF Pension)	2	a
AMICE - Association of Mutual Insurers and Insurance Cooperatives in Europe (AMICE)	2	b
ANAT - NATIONAL ASSOCIATION OF TRAVEL AGENCIES - ROMANIA (ANAT)	2	b
Arbeitsgemeinschaft berufsständischer Versorgungseinrichtungen e.V. (ABV)	2	d
Arch Insurance (EU) dac (Arch EU)	2	a
ASOCIATIA CONSUMERS UNITED/CONSUMATORII UNITI (ACU)	3	
Assicurazioni Generali S.p.A	2	a
Association Européenne des Cadres de l'Assurance - AECA - European Federation of Executives and Managerial Staff of the Insurance Sector (AECA-CEC)	2	c
Association Internationale de la Mutualité (AIM)	3	
Association of Bermuda Insurers and Reinsurers (ABIR)	2	b
Association of British Insurers (ABI)	2	b
Associazione Bancaria Italiana (ABI)	2	b
Associazione Intermediari Mercati Finanziari - ASSOSIM (Assosim)	2	b
Associazione Italiana del Private Equity, Venture Capital e Private Debt (AIFI)	2	b
Associazione Italiana Private Banking (AIPB)	2	b
Associazione Nazionale fra le Imprese Assicuratrici (ANIA)	2	b
Assuralia, beroepsvereniging van verzekeringsondernemingen (Assuralia)	2	b
Athenora Consulting	1	
Aviva Plc (Aviva)	2	a
AXA	2	a

AXA Investment Managers (AXA IM)	2	a
Bank Gospodarstwa Krajowego (BGK)	6	
BBDSZ Pénzügyi Ágazat Szakszervezeti Szövetsége (BBDSZ)	2	c
Belron International Limited	2	a
BIPAR - European Federation of Insurance Intermediaries (BIPAR)	2	d
British Insurance Brokers' Association (BIBA)	2	b
Bund der Versicherten e.V. (BdV)	3	
BZB-Fedafin (BZB-Fedafin)	2	c
Caisse centrale de la Mutualité Sociale Agricole (CCMSA)	6	
Caisse Nationale des Allocations Familiales (CNAF)	6	
Campaign for the Freedom of the Automotive Parts and Repair Market (ECAR)	2	b
Caravan and Motorhome Club	2	d
Česká asociace pojišťoven (ČAP, CAP)	2	b
Cigna	2	a
City of London Law Society (CLLS)	2	b
Cluster Maritime Luxembourgeois asbl (CML)	2	b
Cooley LLP	1	
Covéa	2	a
Crédit Agricole S.A.	2	a
Cross Border Benefits Alliance-Europe (CBBA-Europe)	2	c
Dachverband der österreichischen Sozialversicherungen (DVSV)	6	
Danske Bank	2	a
Degroof Petercam Asset Management (DPAM)	2	a
Deutsche Aktuarvereinigung e.V. (DAV)	2	c
Deutsche Gesetzliche Unfallversicherung e.V. (DGUV)	6	
Deutsche Sozialversicherung Arbeitsgemeinschaft Europa (DSVAE)	6	
DNB Bank ASA (DNB)	2	a
Drones for Europe (D4E)	2	b

DWS Group GmbH & Co. KGaA (DWS)	2	a
Environmental Liability Solutions Europe Ltd. (ELS Europe)	1	
European Blind Union (EBU)	3	
European Captive Insurance and Reinsurance Owners Association (ECIROA)	2	d
European Federation of Patients' Associations for Anthroposophic Medicine (EFPAM)	3	
European Forum of Deposit Insurers (EFDI)	6	
European Insurance CFO Forum (CFO Forum)	2	a
European Microfinance Network aisbl (EMN aisbl)	3	
European Organisation for Research and Treatment of Cancer (EORTC)	3	
European Real Estate Forum (EREF)	3	
European Social Insurance Platform AISBL (ESIP)	3	
Fédération Européenne des Conseils et Intermédiaires Financiers (FECIF)	2	b
Fédération Française de l'Assurance (FFA)	2	b
Fédération Nationale de la Mutualité Française (FNMF)	2	c
Federation of European Risk Management Associations (FERMA)	2	c
Fidelity International (FIL)	2	a
Finance & Leasing Association (FLA)	2	b
Finance Norway (Finans Norge)	2	b
Finance Sector Union (FSU)	2	c
Financial Services Consumer Panel (FSCP)	2	a
Finanssiala ry - Finance Finland (FA - FFI)	2	b
FirstRand (FSR)	2	a
Forum Nachhaltige Geldanlagen (FNG)	2	b
Germanwatch	3	
Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	2	b
GKV-Spitzenverband	6	
Global Federation of Insurance Associations (GFIA)	2	b

Health Tourism Industry Partner (HTI)	1	
Iceye Oy (Iceye)	2	a
IFM Investors (UK) Ltd (IFM Investors)	2	a
Industriens Pensionsforsikring A/S (Industriens Pension)	2	a
Institutional Limited Partners Association (ILPA) (ILPA)	2	b
Insurance & Pension Denmark (Forsikring & Pension) (IPD)	2	b
Insurance Europe (Insurance Europe)	2	b
Insurance Ireland	2	b
International association for the study of insurance economics (Geneva Association)	4	
International Credit Insurance & Surety Association (ICISA)	2	b
International Federation of Freight Forwarders Associations (FIATA)	3	
International Forum of Insurance Guarantee Schemes (IFIGS)	3	
International Swaps and Derivatives Association (ISDA)	2	b
International Underwriting Association of London Limited (IUA)	2	b
International Union of Marine Insurance (IUMI)	2	b
Invest Europe (Invest Europe)	2	b
Investment & Life Assurance Group Limited (ILAG)	2	b
Italian Banking, Insurance and Finance Federation (FeBAF)	2	b
Kommission Arbeitsschutz und Normung (KAN)	6	
Koninklijke Belgische Vereniging van Transportverzekeraars vzw - Royale Associaton Belge des Assureurs Maritimes asbl (ABAM BVT)	2	b
Korea Insurance Research Institute (KIRI)	4	
Legal & General Group Plc (L&G)	2	a
Legal Protection International aisbl (LPI)	2	b
Liberty Mutual Insurance Group (LMIG)	2	a
Lloyds Banking Group plc	2	a
Lloyd's of London	2	d
M&G plc	2	a

MALTA INSURANCE ASSOCIATION (MIA)	2	b
Malta Union of Bank Employees (MUBE)	2	c
MAPFRE S.A.	2	a
Mediation Centre at the Croatian Insurance Bureau (CMHUO)	2	d
MERCI CHARITY BOUTIQUE (MCB)	3	
MetLife Europe	2	a
Mn Services N.V. (MN)	2	a
Motor Insurers Bureau of Ireland (MIBI)	3	
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen (Munich Re)	2	a
Mutuelle Générale de l'Education Nationale (MGEN)	2	a
National Farmers' Union (NFU)	2	c
National Institute for Health and Disability Insurance (NIHDI)	6	
NATIXIS	2	a
NN Group N.V. (NN Group)	2	a
Nordic Financial Unions (NFU)	2	c
Norwegian Financial Services Complaints Boards (FinKN)	3	
Pan-European Insurance Forum (PEIF)	2	b
PensioPlus (PensioPlus)	2	a
PHOENIX Pharma SE (PHOENIX group)	2	a
Ports and Terminals cvba (PortExpertise)	1	
PostePay S.p.A.	2	a
Practical Action	3	
PROEF (PROEF)	2	a
RAC Motoring Services (RAC)	2	a
Reinsurance Advisory Board (RAB)	2	b
Reinsurance Association of America (RAA)	2	b
RELX	2	a
S2 GRUPO DE INNOVACIÓN EN PROCESOS ORGANIZATIVOS, S.L.U. (S2 Grupo)	2	a
SCOR SE	2	a

Slovensko zavarovalno združenje (SZZ)	2	b
Social Economy Europe (SEE)	2	b
Stowarzyszenie Forum Recyklingu Samochodów FORS	2	b
Svensk Försäkring	2	b
Swiss Re Ltd.	2	a
Talanx AG (Talanx)	2	a
The Financial Data and Technology Association (FDATA)	2	b
The Fullilove Consulting Group (TFCG)	1	
Transfrigoroute International (TI)	2	b
UNI Europa	2	c
Union Asset Management Holding AG (UMH)	2	a
UNIÓN ESPAÑOLA DE ENTIDADES ASEGURADORAS Y REASEGURADORAS (UNESPA)	2	c
Verband der Ersatzkassen e.V. (vdek)	3	
Verband der Versicherungsunternehmen Österreichs / Austrian Insurance Association (VVO)	2	b
Verbond van Verzekeraars / Dutch Association of Insurers	2	b
Vienna Insurance Group AG Wiener Versicherung Gruppe (VIG)	2	a
Wellington Management International Limited (WMIL)	2	a
WindEurope	2	b
World Nuclear Association (WNA)	2	b
Zurich Insurance Company Ltd	2	a
ΈΝΩΣΗ ΑΣΦΑΛΙΣΤΙΚΩΝ ΕΤΑΙΡΙΩΝ ΕΛΛΑΔΟΣ (EAEE)	2	b

Appendix 7 - List of Interest Groups and Abbreviations

Interest group	Abbreviation
AMICE - Association of Mutual Insurers and Insurance Cooperatives in Europe (AMICE)	AMICE
Associazione Intermediari Mercati Finanziari - ASSOSIM (Assosim)	Assosim
Associazione Italiana del Private Equity, Venture Capital e Private Debt (AIFI)	AIFI
Associazione Italiana Private Banking (AIPB)	AIPB
Associazione Nazionale fra le Imprese Assicuratrici (ANIA)	ANIA
Assuralia, beroepsvereniging van verzekeringsondernemingen (Assuralia)	ASSURALIA
British Insurance Brokers' Association (BIBA)	BIBA
Campaign for the Freedom of the Automotive Parts and Repair Market (ECAR)	ECAR
Česká asociace pojišťoven (ČAP, CAP)	CAP
City of London Law Society (CLLS)	CLLS
Cluster Maritime Luxembourgeois asbl (CML)	CML
Fédération Française de l'Assurance (FFA)	FFA
Finance & Leasing Association (FLA)	FLA
Finance Norway (Finans Norge)	FINNOR
Finanssiala ry - Finance Finland (FA - FFI)	FFI
Forum Nachhaltige Geldanlagen (FNG)	FNG
Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	GDV
Institutional Limited Partners Association (ILPA) (ILPA)	ILPA
Insurance & Pension Denmark (Forsikring & Pension) (IPD)	IPD
Insurance Europe (Insurance Europe)	IE
Insurance Ireland	II
International Credit Insurance & Surety Association (ICISA)	ICISA
International Union of Marine Insurance (IUMI)	IUMI
Investment & Life Assurance Group Limited (ILAG)	ILAG
Koninklijke Belgische Vereniging van Transportverzekeraars vzw - Royale Associaton Belge des Assureurs Maritimes asbl (ABAM BVT)	ABAM BVT
MALTA INSURANCE ASSOCIATION (MIA)	MIA

Reinsurance Association of America (RAA)	RAA
Slovensko zavarovalno združenje (SZZ)	SZZ
Social Economy Europe (SEE)	SEE
Stowarzyszenie Forum Recyklingu Samochodów FORS	FORS
Svensk Försäkring	SVENFÖR
The Financial Data and Technology Association (FDATA)	FDATA
Verband der Versicherungsunternehmen Österreichs / Austrian Insurance Association (VVO)	VVO
Verbond van Verzekeraars / Dutch Association of Insurers	DAI
WindEurope	WINDEU
World Nuclear Association (WNA)	WNA
ΈΝΩΣΗ ΑΣΦΑΛΙΣΤΙΚΩΝ ΕΤΑΙΡΙΩΝ ΕΛΛΑΔΟΣ (EAEE)	EAEE

Appendix 8 – Complex Solution Original Data Set

```
--- COMPLEX SOLUTION ---
frequency cutoff: 1
consistency cutoff: 0.760596
                              raw        unique
                           coverage    coverage   consistency
                          ----------  ----------  ----------
MEMBER*FUNCT*RES*~DESIGN   0.342044    0.139028    0.818109
MEMBER*FUNCT*RES*AGE       0.278392    0.0753769   0.831832
solution coverage: 0.41742
solution consistency: 0.845893



Cases with greater than 0.5 membership in term MEMBER*FUNCT*RES*~DESIG
  FFA (0.75,0.553333)
Cases with greater than 0.5 membership in term MEMBER*FUNCT*RES*AGE: I
  GDV (0.75,1)
```

Appendix 9 – Parsimonious Solution Original Data Set

```
--- PARSIMONIOUS SOLUTION ---
frequency cutoff: 1
consistency cutoff: 0.760596
                      raw         unique
                   coverage     coverage    consistency
                   ----------   ----------   ----------
MEMBER*FUNCT*RES    0.467672     0.467672     0.860135
solution coverage: 0.467672
solution consistency: 0.860135


Cases with greater than 0.5 membership in term MEMBER*FUNCT*RES: IE (1,1),
  GDV (1,1), FFA (0.75,0.553333)
```