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Data Diplomacy: Unlocking Influence Through Interest Groups in the EU

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Abstract

Data plays an increasingly important role in our daily lives, from personal use on our phones to its integration into economic activities, business innovations, and public services. Recognizing this, the European Union has developed a data strategy that aims to establish the EU as a leader in the global data economy ([EC], n.d.). A key component of this strategy is the Data Act, designed to enhance data availability and set comprehensive rules for data access and use across all economic sectors within the EU (Haeck, 2023). The Data Act has elicited mixed reactions from different stakeholders (Chee, 2023; n.a., 2023).

Despite extensive research on the General Data Protection Regulation (GDPR), another legislative initiative under the EU data strategy, there is a notable research gap in understanding the lobbying efforts surrounding the Data Act. This study addresses this gap by examining the influence of interest groups to identify the factors that contribute to successful lobbying on the Data Act proposal. Specifically, this research focuses on the interdependent exchange between the European Commission and interest groups, investigating how this exchange explains the variation in lobbying success during the policy formulation phase of the Data Act. Due to the European Commission's resource constraints, the Commission relies on interest groups for information, citizen support, and economic resources to formulate policy, while interest groups depend on the Commission for influence (Klüver, 2011b).

The results reveal that, contrary to theoretical expectations, economic resources and information provision were not the primary determinants of lobbying success for interest groups. Instead, alignment with public opinion and effective advocacy for public interest significantly enhanced their success. The results of this study indicate that policymakers in the context of the Data Act prioritized public opinion and considered the detailed preferences of various interest groups to achieve equitable and effective policy outcomes. This approach could lead to more democratic and transparent policymaking processes, ensuring that the policies developed are more reflective of public needs and concerns. Additionally, it could enhance the legitimacy and acceptance of the Data Act, as well-aligned policies with public sentiment are likely to face less resistance. However, the study is limited by the word count measure of information supply, potential selection bias of IGs, and the reliance on an ordinal scale for preference attainment, which may affect the robustness of the findings.

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List of Abbreviations

AFS – Allied For Startups

BEUC – European Consumer Organization

CCIA – Computer & Communications Industry Association

CIPL – Centre For Information Policy Leadership

COM – COMMUNIA

DE – Digital Europe

EBF – European Banking Federation

European Commission – EC

European Union – EU

FTE – Full-Time-Equivalent

GDPR – General Data Protection Regulation

IMT – Institute Mines-Telecom

Interest Group – IG

LERU – League of European Research Universities

LU – LUND University

MCT – Model Contractual Term

OF – Open Future

SME – Small and Medium sized Enterprise

1. Introduction

In today's rapidly evolving data landscape, data is a cornerstone of modern societies. From internet browsing to public institution operations, data creation is constant and ubiquitous. The amount of data is expected to increase fivefold between 2018 and 2025 ([EC], 2024). Effective data use can benefit citizens, spur innovation, and drive new products and services across industries ([EC], 2024). Recognizing data's importance, the European Union (EU) introduced the European Data strategy in February 2020, aiming to position the EU as a leader in the global data economy ([EC], 2024). To achieve this, the strategy includes measures to protect data, ensure secure storage, and establish clear regulations for data use ([EC], 2024). A central initiative within this strategy is the Data Act, which aims to make more data available, setting rules on data access and use across all economic sectors in the EU (Haeck, 2023). This addresses the underutilization of industrial data, with 80 percent of machine-generated data in Europe currently being unused (Haeck, 2023). The Act also mandates data sharing with public sector entities in certain scenarios (Blythe et al., 2023).

The Data Act has drawn varied responses. Industry stakeholders, such as Siemens and SAP, expressed concern about its potential impact on trade secrets and competitiveness and critique the broad data-sharing approach (Chee, 2023; n.a., 2023). Business associations have highlighted the necessity for fair data access for small and medium-sized enterprises (SMEs) (Toffaletti, 2023). Similarly, academia has emphasized the importance of improved access to data for scientific purposes (The Guild, 2023).

The Data Act's proposal was developed through a legislative initiative of Commissioner Thierry Breton and following public consultation, the final proposal was adopted in February 2022 (Observatory, 2024). After triilogue negotiations, the Council and the European Parliament reached a political agreement on the final text in June 2023 ([EP], 2024). The European Parliament formally endorsed the new legislation during its November 2023 plenary session ([EP], 2024). Following its entry into force, the Data Act will become applicable on September 12, 2025 ([EP], 2024).

1.1. Research Aim and Question

The interactions between EU institutions and interest groups (IGs) are of fundamental importance to the functioning of representative government (European Parliament [EP], n.d.). They play a pivotal role in providing essential information and perspectives to policymakers (Eising, 2007; Holman & Luneburg, 2012). While lobbying is protected in Europe and facilitates direct communication with lawmakers, it also risks corruption and undermining

governmental legitimacy by favoring private interests over the public good (Eising, 2007; Holman & Luneburg, 2012). As non-state actors become increasingly engaged in the policy cycle, a complex network of multi-level lobbying coalitions emerges, significantly influencing EU legislative outcomes (Coen, 2007) Nevertheless, the mere presence of lobbying groups does not guarantee success. Consequently, it is necessary to examine the factors contributing to the varying outcomes between corporate and civil society interests (Bouwen & McCown, 2007; Halpin & Fraussen, 2017).

The European Commission's (EC) exclusive right to initiate legislation makes it a primary target for lobbying activities, especially during the policy formulation stage (Bouwen, 2009). This period offers numerous opportunities to shape the direction of legislative debates before formal proposals are presented (Bouwen, 2009). Once a formal proposal is made, changing it becomes difficult, highlighting the importance of early influence (Bouwen, 2009). Consequently, the policy formulation stage represents a pivotal moment to assess the impact of IG lobbying on proposed policies. Due to limited staffing resources and the increasing transfer of competencies from member states to the EU, the EC frequently relies on external sources for expertise, citizen support, and economic power, thereby establishing an interdependent exchange with interest groups (IG) (Klüver, 2011b; Klüver, 2013). The success of lobbying efforts depends on an IG's ability to meet the EC's needs in these areas (Klüver, 2013).

This study aims to determine the extent to which the interdependent exchange between the EC and IGs explains the variation in lobbying success during the policy formulation phase of the Data Act. Specifically, the research question is:

To what extent does the interdependent exchange between the European Commission and interest groups explain the variation in lobbying success during the policy formulation phase of the Data Act?

1.2. Societal Relevance

In the digital age, data has become immensely important, raising critical concerns about data security, privacy, and its strategic use for competitive advantage. The EU's Data Act addresses these issues by establishing a robust framework for data handling and governance, aimed at enhancing competition and innovation, particularly for SMEs. The Act's significant impact on personal and industrial data management, and its role in facilitating data reuse, including for the public sector, underscores the need to understand how such policies are formulated. This study explores how the interdependent exchange between the EC and IGs explains the variation in lobbying success during the Data Act's policy formulation phase. By analyzing the lobbying

success of different IGs, this research highlights the profound effects legislative changes can have on European companies, public institutions, and society.

1.3. Theoretical Relevance

This research holds significant theoretical relevance as it contributes to the literature on EU policy-making processes and the legitimacy of decision-making in democratic systems (Klüver, 2013). By examining how IGs influence policy outcomes, this study provides valuable insights into EU governance and policy trajectories. Given that data policy has become a priority for the EU in recent years, the study of lobbying success in the context of the Data Act is particularly timely and relevant. Despite the increased focus on digital policy, research on lobbying within this policy field, and particularly on the latest legislative addition under the EU Data Strategy, remains scarce. This study addresses these gaps by investigating the conditions under which IGs succeed in influencing the Data Act. It builds on and extends theories of interdependent exchange between the EC and IGs, emphasizing the evolving role of economic resources, public opinion alignment, and advocacy strategies (De Bruycker & Colli, 2023, De Bruycker & Hanegraad, 2024; Dür et al., 2015; Klüver, 2011b). By doing so, it offers new insights into the effectiveness of IGs in shaping digital policy within the EU. This study not only deepens our understanding of the factors contributing to IG success but also highlights the ever more important role of IGs alignment with public opinion.

1.4. Research Structure

After introducing the research and underlying research question, the second chapter will explore the concept of lobbying success and its determinants through an extensive literature review. The theoretical framework will outline hypotheses based on this review. The fourth chapter will detail the research design and methodology, justifying the chosen approach and presenting the operationalization process. Chapter 5 will analyze the positions of diverse IGs on different policy issues within the EC's proposal, testing the hypotheses to understand lobbying success. Chapter 6 discusses the results of the empirical analysis and considers the research's limitations, while Chapter 7 concludes the study with a summary, its implications, and further recommendations.

2. Literature Review

The formulation of effective public policies often hinges on the complex interplay between governmental bodies and various IGs. In the context of the EU's Data Act, the role of IGs becomes particularly significant. This literature review explores the origins and evolution of lobbying, the determinants of lobbying success, and the mechanisms through which IGs exert influence on policy formulation.

2.1. Interest Group Influence in EU Policy-Making

Lobbying is a central aspect of EU policymaking, with numerous IGs actively engaging with policymakers to influence legislative outcomes (European Parliament [EP], n.d.). Since the mid-1980s, the number of active IGs in the EU has significantly increased (Dür, 2009). Studies of lobbying have looked at various policy areas, but Data governance within the EU is particularly notable due to its need to balance data protection and citizens' rights with the economic interests of companies. This tension creates varied lobbying positions, reflecting the priorities of EU market competitiveness, business attractiveness and data privacy concerns. The rise of data policy, driven by AI's potential and the presence of tech giants like Google, makes it a prime area for studying lobbying dynamics and interdependent exchange ([CEO], 2021).

Scholars such as Coen (2007) have delved deeply into the influence of IGs in EU policymaking, shedding light on the complex dynamics of lobbying within the European institutions. Their extensive research, together with comprehensive analyses of IG dynamics in Europe, underlines the undeniable influence of these groups in shaping EU legislation (Coen, 2007). Through various channels, such as consultations, expert committees and direct advocacy, IGs exert considerable pressure on policymakers, influencing the content and course of legislative proposals (Lehmann, 2003).

The European multi-level system further empowers IGs by providing multiple access points (Dür, 2008, Lehmann, 2003). Societal actors have many opportunities to influence both at national and European level, with institutions such as the European Parliament and the EC being particularly receptive to lobbying (Dür, 2009). Especially in the early stages of the policy cycle, when the EC plays a central administrative role, IGs actively lobby to shape proposed regulations or prevent their inclusion on the agenda (Nelson & Yackee, 2012). Over time, the EC has become the primary target of significant IG lobbying (Hermansson, 2016).

The EC's stakeholder consultation procedures have emerged as a central focus of lobbying within the EU (Hermansson, 2016). These procedures provide a direct channel for IGs to express their views on policy outcomes, attracting the participation of thousands of organized

stakeholder organizations in the governance process (Hermansson, 2016). This engagement has not only consolidated the legitimacy of the EC but also provided a source of legitimacy for its legislative proposals (Hermansson, 2016; Lehmann, 2003).

2.2. Lobbying success

Despite widespread engagement, access to European institutions does not ensure effective interest representation (Klüver, 2011a). At the heart of discussions on EU lobbying is the fundamental question of its effectiveness, particularly in terms of translating lobbying efforts into tangible outcomes. Dür and De Bièvre (2007) suggest that the effectiveness of lobbying relies on the alignment of interests with policy outcomes, with actors exerting influence when policies are closely aligned with their preferences. This conceptualization assumes that actors have distinct preferences for desired outcomes, and frames lobbying success as the ability of IGs to realize their policy goals (Dür et al., 2015). However, the difficulty of measuring influence should not be underestimated. Obstacles exist in reaching a consensus on the definition of influence, considering different pathways through which IGs exert influence, and measuring influence due to the different methods' limitations (Dür, 2008). Various scholars have examined the factors that contribute to lobbying success, covering individual, institutional, organizational, and issue-related dimensions (Dür, 2008a; Dür & De Bièvre, 2007; Klüver, 2012; Klüver, 2013; Mahoney, 2007; Michalowitz, 2007). But what are the factors influencing lobbying success of IGs in EU Data policy?

2.2.1. Lobby success based on interdependent exchange

Lobbying success in the dynamic landscape of EU policymaking hinges on interdependent exchanges among various stakeholders (Klüver, 2011b). Given the EC's staffing constraints and expanding competencies (Bouwen, 2009), well-resourced IGs bridge the gap by providing critical information, thereby enhancing their influence on policymaking (Klüver, 2012).

The effectiveness of IGs' lobbying is closely linked to the resources at their disposal (Klüver, 2011b). De Bruycker and Colli (2023) classify these into economic and political resources. Economic resources enable IGs to mobilize expertise, launch advocacy campaigns, and access decision-making institutions (De Bruycker & Colli, 2023). Political resources involve representing broad constituencies, mediating between societal interests and policymakers, and mobilizing political support (De Bruycker & Colli, 2023). Factors such as group type, size, membership, internal organization, and geographical concentration affect an IG's resource endowment, influencing their lobbying success (Dür, 2009; Dür et al., 2015).

Research shows that organizations with higher economic resources navigate EU policymaking complexities more effectively and influence legislative outcomes (Klüver, 2011b). Specifically, Business IGs often exert significant influence due to their resource access, professionalization, and ability to provide policymakers with essential information, especially on complex issues (Dür et al., 2015; Klüver, 2011b, 2012). This capability to shape policy proposals is reinforced by the positive correlation between information provision and policy influence (Klüver, 2011b).

Furthermore, policymakers aware of the need to maintain electoral support, weigh the input of both the public and IGs when making policy decisions (Rasmussen et al., 2017). This balancing act underscores the importance of public support for IG policy positions, as demonstrated by empirical evidence (De Bruycker & Colli, 2023; Klüver, 2011a; Rasmussen et al., 2017). Despite the mentioned advantages of business IGs, they often face opposition from non-business actors like citizen groups and trade unions, which possess significant mobilization capabilities (Dür et al., 2015). In essence, Klüver (2011b) highlights a dynamic exchange where the EC trades influence for access to key resources such as information, citizen support, and economic resources, emphasizing the central role of IG strength in effective lobbying.

2.2.2. Lobby success based on coalition formation

Rasmussen et al. (2017) state that policymakers are unlikely to listen to the advice and demands of independent advocates. IGs strategically use coalition building as a cornerstone of their influence-building arsenal (Junk, 2020; Klüver, 2011b; Koch, 2023; Nelson & Yackee, 2012).

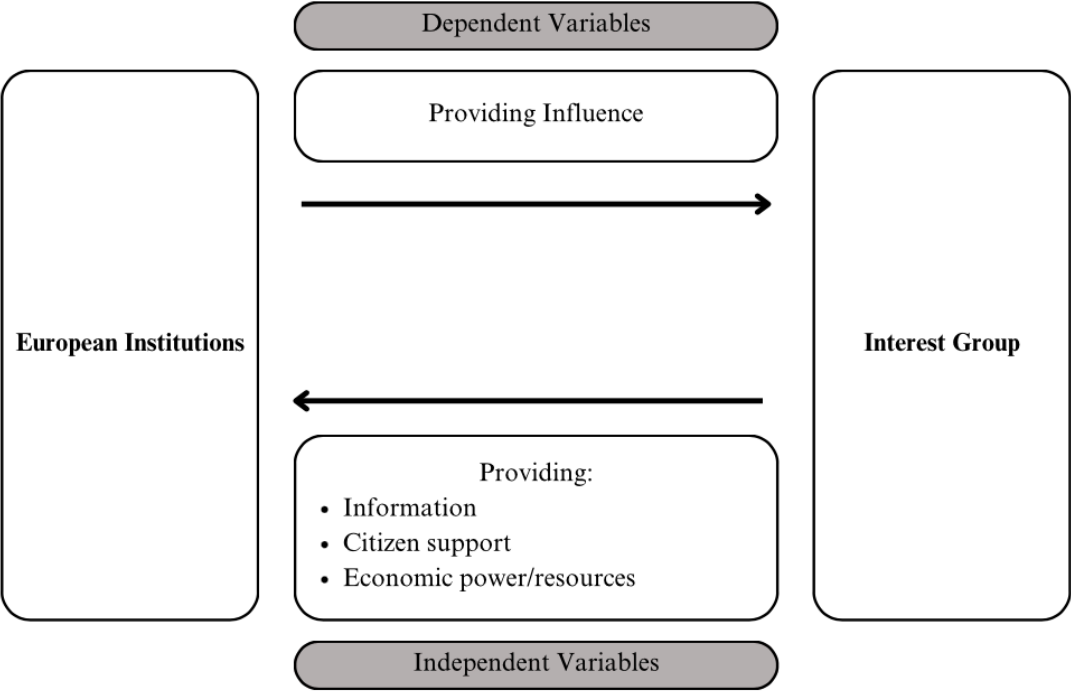
Within these coalitions, collaborative efforts abound, allowing IGs to pool resources, allocate tasks efficiently, and present a united front that amplifies support for their policy positions (De Bruycker & Beyers, 2018; Koch, 2023). However, the path to coalition building is not without its challenges. Coordination efforts and potential compromises to group identity loom large, highlighting the nuanced balance between costs and benefits (De Bruycker & Beyers, 2018). Despite these hurdles, collective benefits often outweigh individual costs, enhancing lobbying success (Baumgartner et al., 2009).

Nelson and Yackee's (2012) study indicates that larger, cohesive coalitions secure higher preference attainment. However, previous quantitative analyses show mixed results (Bunea, 2013). Junk (2020) emphasizes active collaboration in coalitions, where resource exchange increases access and influence, particularly for less advantaged interests, termed the 'weapon of the weak.' This complex interplay highlights the multiple dynamics at play in coalition-based lobby.

3. Theoretical Framework

In this section, I present a theoretical framework designed to explain the varying degrees of success of IGs in shaping policy formulation within the EU. This framework addresses the complex dynamics of IG influence within the EU policymaking landscape. At its core are fundamental assumptions about the motivations and objectives that drive both IGs and the EC (Klüver, 2011b). Based on these assumptions, I formulate hypotheses about the interdependent exchange of resources and influence between IGs and the EC, as well as the role of coalitions in this process. To illustrate this exchange model, Figure 1 outlines the dynamics of this theoretical framework.

Fig. 1: Framework adapted from Klüver (2011b)



3.1. Information Supply

According to many European lobbying observers, success in influencing legislation often depends on informational lobbying, where stakeholders provide decision-makers with specialized knowledge and expertise tailored to their preferences (Klüver, 2011b; Hermansson, 2016). This approach is seen as particularly effective in scenarios of high policy complexity, where the lobbied institution lacks the capacity to independently gather and analyze information (Hermansson, 2016). The EC, facing staffing and bureaucratic constraints, often relies on external stakeholder expertise to develop legislation that takes into account the different legal

systems and conditions in the Member States (Bouwen, 2009; Hermansson, 2016). The expertise required varies depending on the legislative directive under consideration, requiring a broad definition of expertise that can be applied in different contexts (Hermansson, 2016). IGs play a key role in providing this crucial information to the EC in exchange for influence (Klüver, 2011b). Therefore, the following hypothesis is proposed:

H1: *IGs are more likely to achieve their preferred outcome in the legislative debate of the Data Act when they provide substantial policy-relevant information compared to when they offer limited information.*

3.2. Citizen Support

In addition to the provision of information and expertise, the role of public opinion plays an important role in determining the success of lobbying (De Bruycker & Colli, 2023; Klüver, 2011b). Despite the perception of EU public policy as typically technocratic and disconnected from citizens' daily lives, recent studies have shown a trend towards politicization, attracting the attention of a wide range of citizens, stakeholders, and media (De Bruycker & Colli, 2023; Rauh, 2019). This increased scrutiny raises the stakes for decision-makers in terms of maintaining their legitimacy (De Bruycker & Colli, 2023). Recognizing the importance of maintaining electoral support, policymakers carefully weigh input from both the public and IGs during policy deliberations (Rasmussen et al., 2017).

The link between citizen support and lobbying success lies in the role of IGs as intermediaries between the public and policymakers, articulating the views of their constituents (Bevan & Rasmussen, 2020; De Bruycker & Colli, 2023; Klüver & Pickup, 2018). IGs that advocate widely supported positions are perceived as more credible by policymakers, thereby increasing their political credibility (De Bruycker & Colli, 2023). Recent studies have shown that groups that align with public opinion are more likely to achieve their policy goals (Rasmussen et al., 2018; De Bruycker and Beyers, 2019).

Viewing citizen support as a passive political resource shows that groups benefit from it without necessarily controlling it (De Bruycker & Colli, 2023). Previous research has shown that individual groups have limited influence on salience or public opinion (Dür & Mateo, 2014). Instead, IGs that are aligned with the majority opinion are perceived by policymakers as credible intermediaries (De Bruycker, 2021; De Bruycker & Rasmussen, 2021). In such cases, political institutions may respond to public opinion rather than IGs, favoring those groups that align with majority opinion. Therefore, the following hypothesis is proposed:

H2: *IGs that align their position with public opinion and benefit from substantial citizen support on a given issue are more likely to achieve their preferred outcome in the legislative debate of the Data Act.*

3.3. Economic Resources

The ability of IGs to shape policy proposals depends largely on their economic resources (De Bruycker & Hanegraaf, 2024, De Bruycker & Colli, 2023; Klüver, 2011). These include expenditures on staff, consultancy, and advocacy materials like amendment proposals and research reports (Bruycker & Hanegraaf, 2024). Existing research highlights the crucial role of economic resources in enhancing groups' ability to provide valuable information to policymakers (De Bruycker & Colli, 2023; Klüver, 2011). These resources allow IGs to mobilize expertise, conduct extensive advocacy and secure access to decision-making institutions (De Bruycker & Colli, 2023). Well-resourced IGs exhibit higher professionalism and can offer crucial policy insights (Dür et al., 2015). They can allocate more time, effort, and specialized staff to research, policy monitoring, solution development, and effective communication with decision-makers (De Bruycker & Colli, 2023). Therefore, the following hypothesis is proposed:

H3: *IGs endowed with substantial economic resources are more likely to achieve their preferred outcome in the legislative debate of the Data Act compared to IGs with limited economic resources.*

3.4. Coalition Formation

In the field of lobbying research, it's widely acknowledged that IGs can increase their influence by forming lobbying coalitions (Junk, 2020; Klüver, 2011b; Koch, 2023; Nelson & Yackee, 2012). Rasmussen et al. (2017) further argue that policymakers are unlikely to heed the advice and demands of advocates operating in isolation. Within these coalitions, collaborative efforts flourish, enabling efficient resource allocation and presenting a united front to bolster support for policy positions (De Bruycker & Beyers, 2018; Koch, 2023). Despite the challenges of coordination and potential compromises to group identity, the collective benefits often outweigh individual costs, especially in terms of enhancing lobbying success (Baumgartner et al., 2009). Studies exploring coalition dynamics shed light on their transformative potential. Larger and more cohesive coalitions tend to achieve higher preference attainment in regulatory policymaking (Nelson & Yackee, 2012). Active collaboration within coalitions facilitates

greater access and influence in political processes, particularly benefiting less advantaged interests (Junk, 2019). Therefore, the following hypothesis is proposed:

H4: *IGs are more likely to achieve their preferred outcome in the legislative debate of the Data Act when they actively participate in lobbying coalitions.*

4. Methodological Framework

This chapter will introduce the research design and methodology, focusing on the preference attainment method, case and IG selection. The comprehensive review will endorse the method for this study.

4.1. Research Design

This single case study examines the policy formulation stage of the European Data Act, focusing on IG activities with the EC. Single case studies are valued for their ability to provide a detailed understanding of a phenomenon within a defined context (Priya, 2021; Yin, 2009). This approach effectively examines IG lobbying success and identifies key factors influencing policy-making at the EU level (Voltolini & Eising, 2017). The policy formulation stage is chosen as it represents the most active arena for lobbying in the EU, offering IGs the greatest chance to influence outcomes (Bunea, 2013). However, focusing on one policy area limits the generalizability of the findings due to variations in governance and stakeholder involvement across EU policies (Bunea, 2013).

4.2. Research Method

Measuring IG influence is challenging due to the dynamic nature of lobbying and various factors influencing policy outcomes, including different channels of influence, counteractive lobbying, and varied lobbying tactics across various stages of the policy process (Dür, 2008b).

In the EU, evaluating lobbying often involves assessing IGs' ability to shape policy decisions, influence legislative agendas, and secure favorable policy outcomes (Dür & De Bièvre, 2007; Dür et al., 2015). Linking lobbying efforts to policy outcomes is challenging due to institutional dynamics, public sentiment, and external influences (Dür, 2008b). Additionally, the opacity and lack of accountability in EU lobbying practices complicate accurate assessment (Bouwen & McCown, 2007). Therefore, the analysis targets the initial decision-making stage — the policy proposal stage. Dür (2008b) distinguishes between three approaches to measure IG influence: process tracing, attributed influence, and the degree of preference attainment.

Process tracing, while useful for examining lobbying dynamics throughout the legislative cycle, is less suited for the analysis due to its broader focus and evidence-gathering difficulties (Dür, 2008b). The attributed influence method, relying on subjective stakeholder perceptions, deviates from the study's research objectives (Dür, 2008b). Therefore, the preference attainment method was selected, utilizing data from the open consultation process, which aligns with our research objectives, case study design, and available data.

The preference attainment method measures how well a group's preference are realized by comparing political outcomes with the actor's preferences (Dür, 2008b). In this case, IG influence is assessed by comparing IGs' preferences with the EC's stance before and after the consultation period leading to the final policy proposal (Klüver, 2011b). Stakeholders can provide feedback via the "Have your say" online platform during the consultation phase, offering their preferences and recommendations (Hermansson, 2016). While not the only means of influence, the consultation is the most accessible way for stakeholders to engage with the EC (Klüver, 2011b). Previous studies have employed both quantitative and qualitative methods to measure preference attainment. Klüver (2011b) used quantitative text analysis, while Bunea and Ibenskas (2015) highlighted the qualitative methods' flexibility in analyzing nuanced EU documents. This study follows Bunea's (2013) qualitative content analysis, disaggregating the policy proposal into issues and assigning ordinal scales to estimate IG preferences, providing a detailed assessment of IG influence during policy formulation by comparing their preferences to the EC's final proposal.

The preference attainment method is advantageous for uncovering 'invisible influence' in lobbying through observable outcomes (Dür, 2008b). It reveals influence by comparing preferences and outcomes, despite challenges in determining preferences and accounting for alternative explanations, especially in single-case studies and multidimensional topics (Dür, 2008b). Despite these challenges, this method provides valuable insights into IG influence on EU policy formulation.

4.3. Case selection

The selection of the case is grounded in the pivotal role that data policy holds within the EU framework, particularly given the accelerated legislative activities in data and internet governance (Perarnaud, 2021). With the EU's decisions directly impacting member states, companies, citizens, and even third countries, understanding the dynamics and implications of these policy initiatives becomes essential (Perarnaud, 2021).

The Data Act is critical in the ongoing digital transformation ([EC], 2022). It addresses personal and non-personal data handling, unlocks industrial data across Europe, and facilitates data reuse (Anderson et al., 2023). Its provisions foster competition and innovation among SMEs and enhance data sharing between public and private sectors (Anderson et al., 2023). The Act's implications are evident from the diverse policy positions and consultation procedures involving 449 stakeholders from 32 countries, including non-EU states ([EC], 2021d). This diversity reflects the significant interest and lobbying efforts surrounding this legislation and its broad consequences.

4.4. Interest Group Selection

The sample includes IGs of different sizes, types, and interests, ensuring representation of the case under study (see Table 14). IGs were selected using purposive sampling, including business associations, academic and research institutions, and NGOs. Academic and research institutions were included as they contribute a critical, evidence-based perspective on policy issues. NGOs were added to ensure a balanced view on policy impacts, emphasizing the importance of protecting individuals' data rights, promoting transparency, and ensuring that data practices align with broader societal values. This approach ensures diverse perspectives and lobbying strategies are represented.

Individual companies were excluded, recognizing that their perspectives are often encapsulated within broader associations. These associations provide a collective voice that reflects overarching industry concerns and perspectives.

Participation in the consultation process and registration in the transparency register were key inclusion criteria, reflecting a commitment to influencing policy decisions. To ensure a balanced representation, both large and small IGs were included. IGs were classified by size based on FTE in lobbying activities, with <5 considered small and >9.5 large. Information on each IG was sourced from the European Transparency Register, supplemented as needed ([EU], n.d.).

Table 1: Selected IGs

IG	FTE in lobby activities	Size	Type	Interest
Allied For Startups (AFS)	0.7	Small	NGO	Private
Bitkom e.V. (Bitkom)	4.8	Small	Business and Trade association	Private
BSA – Software Alliance (BSA)	35.0	Large	Business and Trade association	Private
Centre For Information Policy Leadership (CIPL)	2.0	Small	Academic/Research institution	Public
COMMUNIA Association for the Public Domain (COM)	4.0	Small	NGO	Public
Computer & Communications Industry Association (CCIA)	5.5	Small	Business and Trade association	Private
Digital Europe (DE)	23.3	Large	Business and Trade association	Private
Eurocities	20.0	Large	NGO	Public
European Banking Federation (EBF)	16.0	Large	Business and Trade association	Private
European Consumer Organization ([BEUC])	27.8	Large	NGO	Public
Institut Mines-Telecom ([IMT])	1.5	Small	Academic/Research institution	Public
League of European Research Universities (LERU)	7.8	Small	Academic/Research institution	Public
LUND University (LU)	2.0	Small	Academic/Research institution	Public
Science Europe (SE)	7.0	Small	Academic/Research institution	Public
Open Future (OF)	1.6	Small	NGO	Public

4.5. Operationalization

To measure *lobbying success*, the preference attainment approach is used, evaluating how IGs influence policy formulation by comparing their preferences with those of the EC before and after the consultation (De Bruycker & Collin, 2023; Klüver, 2011b). This involves using an ordinal scale, indicating whether the desired preference was successfully realized, partially realized or none of their objectives were realized, as depicted in Table 2 (Mahoney, 2007). To ascertain the EC's stance before the consultation, an analysis of the draft proposal was conducted ([EC], 2021b), while examination of the final legislative proposal post-consultation determined the EC's position thereafter. Policy positions were derived from responses to online questionnaires during the consultation and supplementary policy position papers.

Table 2: Adapted from Mahoney (2007). *Measuring Preferences*

Preference Attainment	Score
IG did not attain objective	0
IG partially attain objective	1
IG fully attained objective	2

The impact of *lobbying coalitions* is measured by identifying joint statements to determine if IGs were engaged in coalitions, assessing whether collective action enhances the likelihood of achieving policy goals.

Information supply, is measured by quantifying the number of words in IGs' consultation submissions, based on the length of position papers IGs submitted in the public consultation (Klüver, 2011b). Comments in the public consultation form were excluded due to limited responsiveness in specifying open-ended answers.

Citizen support is measured through Eurobarometer surveys covering attitudes towards digitalization, digital rights, and the views of SMEs views on startups, scale-ups, and entrepreneurship, providing a comprehensive understanding of public sentiment.

Economic resources are measured by Full-Time-Equivalents (FTEs) employed in the IGs Brussels offices as indicated in the transparency register. FTE is a widely accepted proxy for an IG's economic capacity (Klüver, 2011; De Bruycker & Colli, 2023; De Bruycker & Hanegraad, 2024). This is due to IGs' reluctance to disclose direct lobbying expenditures, and the belief that this metric effectively captures the theoretical relationship where economic means enable organizations to hire lobbyists, who then generate pressure and exchange expertise with policymakers (De Bruycker & Hanegraaf, 2024).

Table 3: Operationalization of Variables

Variable	Hypothesis	Indicator	Data	Source
Lobby success	RQ	Preference attainment	White Paper, consultation submissions, policy position papers	EC public consultation, EUR-lex, IG websites
Information supply	H1	Number of words	Policy position papers, consultation submission	EC public consultation, IG website
Citizen support	H2	Opinion EU citizens	Surveys	Eurobarometer
Economic resources	H3	Economic resources	FTE	European Transparency Register
Lobbying coalition	H4	Joint Statements	Identified coalition statements	IG websites

4.6. Reliability and Validity Considerations

Ensuring the scientific integrity of this research requires thorough assessment of its reliability and validity.

Reliability was ensured through meticulous data collection and analysis. Financial data was sourced from the European Transparency Register and the standardized preference attainment approach ([EU], n.d.; Bunea, 2013). However, purposive sampling may weaken reliability due to potential researcher bias (Creswell & Creswell, 2023).

Construct validity was ensured by aligning variables with established theoretical frameworks (Klüver, 2011b; Bunea, 2013; De Bruycker & Colli, 2023; Dür, 2009 & 2015). Construct validity limitations for information supply were noted, as not all words equally contribute to technical detail or quality. Time constraints also made it challenging to accurately assess this aspect through qualitative content analysis. Operationalizing economic resources through overall lobbying expenditure or budget could enhance validity.

High internal validity was achieved through an in-depth case study on a single policy issue, allowing a nuanced examination of IG influence and the EC's position (Creswell & Creswell,

2023). The preference attainment approach facilitated a direct comparison of policy preferences before and after consultations with the EC, minimizing the influence of extraneous factors.

External validity was enhanced by using a diverse sample of IGs within the EU, increasing the likelihood of generalizability to similar groups in comparable settings. The study considered the unique institutional dynamics and regulatory frameworks within the EU, though findings may not be directly transferable to other political systems or regions.

5. Analysis

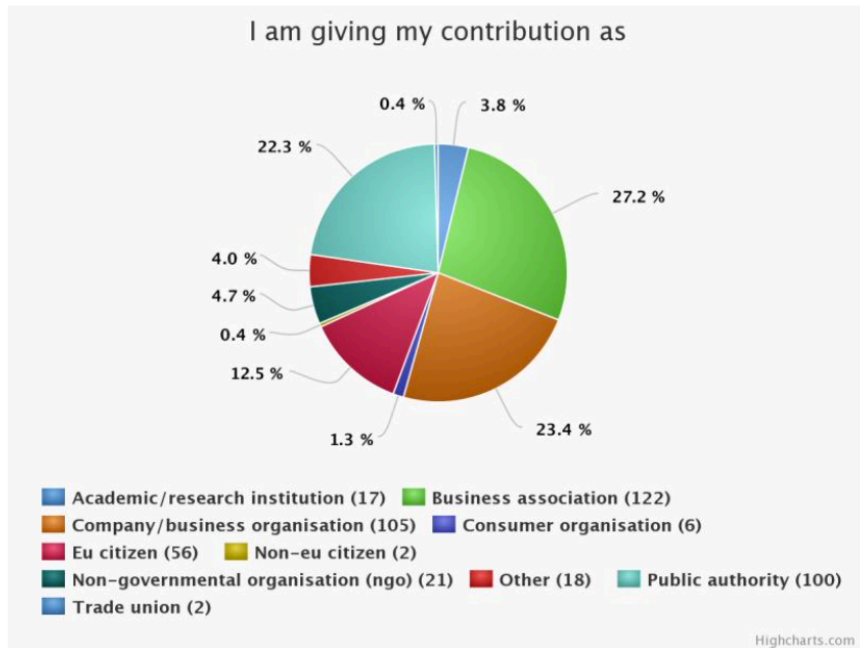
This chapter analyzes the consultation process and contributions from various IGs, focusing on their preferences and preference attainment scores compared to factors like citizen support, information supply, and economic power.

5.1. Consultation on the Data Act

The public consultation from June 3 to September 3, 2021, engaged 449 stakeholders from 32 countries across (see Figure 1) ([EC], 2021d). The stakeholders thereby responded to a questionnaire, which was structured into distinct sections, seeking feedback on the EC's draft proposal on the following topics ([EC], 2021d):

1. Business-to-government data sharing for the public interest
2. Business-to-business data sharing
3. Tools for data sharing: smart contracts
4. Clarifying rights on non-personal Internet-of-Things data stemming from professional use
5. Improving portability for business users of cloud services
6. Complementing the portability right under Article 20 GDPR
7. Intellectual Property Rights – Protection of Databases
8. Safeguards for non-personal data in international contexts

Fig. 2: *Distribution of responses to the public consultation by type of respondent [Summary Report, Public Consultation EU Data Act]*



5.2. Disaggregation of policy issues

Key policy issues of the Data Act were identified and prioritized based consultation contributions and impact assessments (Bunea, 2013). Preference ratings are calculated only for topics on which the IG has taken a position, ensuring only active preferences are evaluated, preventing distortions.

5.2.1. Policy Issue: Business-to-Government Data Sharing

The first significant issue revolves around Business-to-Government (B2G) Data Sharing for the public interest, with most respondents, particularly public authorities, highlighting challenges in this area ([EC], 2021b). Table 5 includes IGs preferences on sub-issues: (1) definition of public interest, (2) voluntary and mandatory data sharing, and (3) and incentives for data sharing.

5.2.1.1. Definition of Public Interest

B2G data sharing is vital for public interest but hindered by legal uncertainties, barriers, and lack of incentives ([EC], 2021d). Stakeholders emphasize the need for a clear public interest definition to balance public sector data access with business interests and privacy ([EC], 2021d). Initially, the EC sought a broad definition to enhance data use for emergencies and

public service improvements ([EC], 2021b), but the final proposal narrowed this to "exceptional need" cases like emergencies or when public tasks cannot otherwise be fulfilled ([EC], 2021c).

NGOs emphasized strong public interest justifications for B2G measures, achieving some inclusion of national, regional, and local authorities, but not a broader range of public services ([OF], 2021; Eurocities, 2021). Additionally, Allied For Startups (AFS) ensured the definition would not access private data under trade secrets or GDPR unless strictly necessary, with confidentiality measures ([AFS], 2021). Business associations preferred minimal regulatory intervention, restricting data-sharing requirements to exceptional needs (Bitkom, 2021; [BSA], 2021; [EBF], 2021; [DE], 2021). Only the Computer & Communications Industry Association (CCIA) and Digital Europe (DE) saw no need for additional EU measures, arguing that public sector bodies could perform tasks without business data and had no difficulties sharing private data ([CCIA], 2021; [DE], 2021). If additional EU action was necessary, they supported a narrowly defined, context-specific public interest in the EU Data Act ([CCIA], 2021; [DE], 2021). Academia supported an inclusive definition for data sharing in public services and long-term research. The final proposal reflects this by allowing data sharing for scientific research if it aligns with the original purpose and is not-for-profit ([LERU], 2021; [SE], 2021).

5.2.1.2. Voluntary and Mandatory Data Sharing

Balancing voluntary and mandatory data sharing is another critical issue. The EC's draft included both, incentives for voluntary participation and mandatory sharing in exceptional cases ([EC], 2021b). The final proposal mandates data sharing only in exceptional cases, without additional measures for voluntary sharing ([EC], 2021c).

NGOs had mixed preferences: AFS favored voluntary measures, while the European Consumer Organization ([BEUC]) and Eurocities advocated for mandatory sharing under specific circumstances ([AFS], 2021; [BEUC], 2021; Eurocities, 2021). The final proposal represents a compromise, ensuring data sharing during emergencies while respecting private entities' autonomy. Business associations preferred voluntary data sharing, with mandatory measures limited to exceptional circumstances, aligning with the final proposal (Bitkom, 2021; [BSA], 2021; [EBF], 2021; [DE], 2021). They sought to protect business interests by ensuring data-sharing obligations were clear and minimally burdensome. BSA, the Software Alliance (BSA) additionally advocated targeting data owners, not processors, reflected in the final proposal ([BSA], 2021). Only CCIA strongly opposed any mandatory measures, advocating for voluntary sharing, thereby did not fully achieve its preferences, as the proposal included

mandatory sharing in exceptional cases ([CCIA], 2021). Academia favored voluntary arrangements, warning that mandatory sharing could be counterproductive ([LERU], 2021). If implemented, mandatory sharing should be limited to specific, exceptional circumstances, ensuring fairness, transparency, and protection of privacy, security, business secrets, and intellectual property ([LERU], 2021; [SE], 2021). The final proposal's restriction of mandatory data sharing to exceptional cases aligns with academia's concerns and includes protective measures, reflecting their preferences.

5.2.1.3. Incentives for Data Sharing

Incentives for B2G data sharing are crucial for motivating private sector participation. Initially, the EC aimed to create fair compensation structures for voluntary sharing but shifted to mandatory sharing in specific contexts, limiting compensation to technical and organizational costs ([EC], 2021b, 2021c). Data provided during emergencies must be free, and SME compensation should not exceed direct costs ([EC], 2021b, 2021c).

NGOs generally supported free data provision during emergencies, broader incentives, and legal clarity ([AFS], 2021; Eurocities, 2021). BEUC's calls for safeguards, mandatory anonymization, and clear usage indications were included ([BEUC], 2021). COMMUNIA (COM) and Open Future (OF) wanted public access to aggregated under open licenses ([COM], 2021; [OF], 2021), while AFS emphasized contractual clarity and sharing successful examples to encourage participation ([AFS], 2021). The final proposal partially reflects NGO preferences by mandating free data provision during emergencies, anonymization, and clear usage indications, but it lacks the broader incentives and legal clarity desired by NGOs like AFS ([EC], 2021c). Researchers' use of data aligns partly with OF and COM's goals for accessibility, but the requirements for open licenses or minimal restrictions on shared data are not fully addressed, limiting the complete realization of NGOs aims for data accessibility and usability. Business associations advocated for fair market compensation, non-monetary benefits, and legal security (Bitkom, 2021; [BSA], 2021; [CCIA], 2021; [EBF], 2021; [DE], 2021). They supported fair market prices for compensation, with DE suggesting marginal costs or fair return on investment as alternatives ([DE], 2021). Bitkom proposed preferential rates or waivers for education, social services, crisis management, or health care, and considered public recognition as non-monetary incentives (Bitkom, 2021). The final proposal partially aligns with these preferences, covering technical and organizational costs and including emergency waivers ([EC], 2021c). However, it falls short of providing full fair market compensation and broader non-monetary incentives as preferred by other associations ([EC], 2021c). Academia sought

mechanisms encouraging participation without significant financial burdens, advocating for fair compensation and benefits for public good ([CIPL], 2021; LERU, 2021; [SE], 2021). The final proposal partly addresses these by including fair compensation and supporting non-commercial research, making data sharing feasible and attractive for private entities while advancing scientific knowledge ([EC], 2021c). However, it does not explicitly address broader incentives.

In summary, the final proposal limits "public interest" to emergencies, aligning with NGOs' preference for strong justification and business associations' preference for minimal regulation, while considering academia's focus on research and innovation. Data sharing is mandated only in exceptional cases, balancing mixed NGO preferences and business associations' preference for voluntary sharing, with academia's concerns for fairness and protection. Incentives include mandates for free data provision during emergencies and anonymization, partially meeting NGO and business association preferences, though broader incentives remain unaddressed.

5.2.2. Policy Issue: Business-to-Business Data Sharing

The second issue is about Business-to-Business (B2B) data sharing. With a significant number of respondents engaging in B2B data sharing and citing obstacles, addressing these challenges is paramount ([EC], 2021d). Table 7 includes IG preferences on sub-issues: (1) fairness test and (2) Model Contractual Terms (MCTs).

5.2.2.1. Fairness Test

The draft proposal aimed to prevent unfair B2B data-sharing terms through a fairness test ([EC], 2021b). The final proposal refined the fairness test to target terms impacting SMEs, introducing clear definitions of unfair terms and listing clauses presumed to be unfair ([EC], 2021c). The fairness test's scope was narrowed to cover data-related contract aspects such as access, use, liability, and breach remedies, while preserving contractual freedom for other contract parts ([EC], 2021c).

Most NGOs did not address the fairness test except BEUC, which supported ([EC], 2021a). Business associations generally opposed broad, mandatory fairness tests, preferring minimal regulatory intervention to maintain contractual freedom and avoid bureaucracy (Bitkom, 2021; [BSA], 2021; [CCIA], 2021; [EBF], 2021; [DE], 2021). They cited concerns about legal uncertainties and adverse impacts on investment, arguing that existing competition tools suffice, and new regulations are unnecessary. The final proposal partially aligned with

their preferences by limiting the fairness test to terms unilaterally imposed on SMEs ([EC], 2021c). However, the introduction of a fairness test indicates that they could not completely prevent regulatory intervention. Academia's views were mixed: the Centre for Information Policy Leadership (CIPL) advocated for clear definitions and voluntary mechanisms ([CIPL], 2021), while the Institut Mines-Telecom ([IMT]) opposed the fairness test ([IMT], 2021). The final proposal balances contractual freedom with fairness, though academia preferred voluntary rules.

5.2.2.2. Model Contractual Terms

MCTs ensure fairness and transparency in data-sharing agreements. Initially, the EC paired the fairness test with these terms ([EC], 2021b). The final proposal recommends voluntary MCTs, helping parties draft balanced contracts considering sector-specific conditions ([EC], 2021c). These terms primarily assist smaller enterprises and aim to influence contract design for fairer data-sharing relationships ([EC], 2021c). However, the final proposal is vague on the development process and scope of these terms.

NGOs stance on MCTs were mixed: AFS supported them, as reflected in the final proposal ([AFS], 2021), while BEUC expressed skepticism towards voluntary model contractual terms, arguing that they lack sufficient incentives for non-personal data sharing and fail to prevent monopolistic practices ([BEUC], 2021). Thus, the alignment between the final proposal and NGO preferences is limited. Business associations supported voluntary MCTs, emphasizing flexibility and legal certainty without additional regulatory burdens (Bitkom, 2021; [BSA], 2021; [CCIA], 2021; [EBF], 2021; [DE], 2021). The final proposal aligns with these preferences by recommending non-binding MCTs ([EC], 2021c). Academia's preference for voluntary mechanisms and clear, incentivized data-sharing frameworks aimed at facilitating research and innovation, aligns with the EC's non-binding recommendations, thus achieving higher preference attainment.

To sum up, the final proposal reflects a compromise, partially addressing the concerns of various IGs. Business associations attained some preferences by limiting the fairness test to SMEs while accepting some regulatory intervention. NGOs and academia saw some preferences incorporated but not fully realized. The proposal promotes fairness in B2B data sharing without imposing broad regulatory burdens, aligning more closely with business associations. The shared support for voluntary MCTs across IGs indicates their importance in facilitating fair B2B data sharing, reflected in the final proposal's emphasis on voluntary terms.

5.2.3. Policy Issue: Improving Portability for Business User of Cloud Services

Cloud portability is crucial as access to competitive and interoperable data processing services is a precondition for a competitive data economy ([EC], 2023). Table 9 includes IG preferences on sub-issues: (1) fairness test and (2) Model Contractual Terms (MCTs).

The EC's draft emphasized interoperability standards to prevent vendor lock-in and foster competition ([EC], 2021b). While voluntary codes of conduct have contributed, they fall short in addressing technical requirements and ensuring interoperability ([EC], 2021b). Therefore, the EC considered three approaches: Standard Contractual Clauses (SCCs) based on industry codes of conduct, high-level legal requirements for all cloud providers, or specific legal requirements covering contractual, technical, and economic conditions ([EC], 2021b). The final proposal introduced binding regulations to ensure portability and interoperability in the cloud market ([EC], 2021c). It mandates eliminating barriers to switching, ensuring contractual clarity, adhering to open interoperability specifications, and exporting data in a structured, machine-readable format ([EC], 2021c). Providers must prove if compliance is technically unfeasible ([EC], 2021c). The proposal combines high-level principles with specific technical and contractual requirements to protect consumer rights and maintain competition ([EC], 2021c). While no specific technical standards are mandated, services must align with European standards or open technical specifications ([EC], 2021c).

NGOs did not comment on current standards. However, AFS, COM, and OF stressed voluntary measures over mandatory regulations, preferring high-level principles ([AFS], 2021; [COM], 2021; [OF], 2021). AFS particularly emphasized avoiding new administrative burdens on startups and SMEs which SCCs or specific legal requirements might introduce ([AFS], 2021). The final proposal aligns with their preference by not imposing specific mandatory technical standards ([EC], 2021c). However, it includes combined minimum regulatory obligations, contradicting their preference for purely voluntary measures. BEUC and Eurocities supported legislation with specific contractual, technical, commercial, and economic conditions to ensure effective data portability ([BEUC], 2021; Eurocities, 2021). The final proposal aligns with their preference by introducing regulatory obligations but stops short of mandating specific technical standards, which they might have favored for clearer guidance ([EC], 2021c). Business associations support industry-driven standards like SWIPO Codes of Conduct and ISO standards, arguing for voluntary measures as more effective and flexible (Bitkom, 2021; [BSA], 2021; [CCIA], 2021; [EBF], 2021; [DE], 2021). They argue these standards better address cloud portability complexities while ensuring fairness and transparency. However, the final proposal incorporates binding legal obligations beyond voluntary measures, introducing

specific legal and technical standards, which go beyond what associations like Bitkom and DE preferred ([EC], 2021c). Academia did not comment on existing standards but emphasized legal certainty, data quality, and secure storage infrastructures. The League of European Research Universities (LERU) advocated for SCCs to ensure data portability ([LERU], 2021). CIPL and Lund University. (LU) preferred voluntary mechanisms for flexibility and innovation ([CIPL], 2021; [LU], 2021). If a data portability right was to be introduced CIPL advocated for high-level principles ([CIPL], 2021). In contrast, IMT criticized self-regulation and called for detailed legislative mandates to ensure rigorous compliance, crucial for data-dependent sectors like research ([IMT], 2021). The final proposal partially aligns with academic preferences, including high-level principles for data quality and legal certainty, but not fully embracing voluntary mechanisms ([EC], 2021c). It reflects IMT's call for detailed regulations but stops short of fully mandating SCCs, thus not completely aligning with LERU's preferences.

The EC's final proposal on cloud portability reflects a compromise. Business associations saw partial attainment but had to accept binding regulations. NGOs and academia had mixed results, with the proposal including high-level principles and specific mandates but not fully aligning with any single group's preferences.

5.3. Total preference attainment

Table 4 illustrates the preference attainment of various IGs on three significant policy issues in the Data Act formulation. Preferences of NGOs, business associations, and academia were evaluated based on their alignment with the final proposals. Not every IG commented on every issue, which lowered their overall scores. Absence of comments can distort results, as it may indicate strategic restraint rather than high preference attainment.

For B2G data sharing, the NGOs had a high preference attainment, particularly AFS, BEUC, and Eurocities. The NGOs with 68 percent of their preferences met, indicating significant influence on the final proposal. Business associations attained 58 percent of their preferences, favoring minimal regulatory intervention and voluntary sharing but facing some regulatory impositions. Academia achieved 64 percent, focusing on research and innovation within the public interest framework. Overall, all groups were relatively close in their influence on this policy issue.

In B2B data sharing, business associations achieved the highest preference attainment at 70 percent, reflecting their successful advocacy for voluntary MCTs and minimal regulatory intervention, though some mandatory fairness tests for SMEs were included. NGOs had a lower

engagement, with a 67 percent attainment. This is also due to the overall lack of comments on the sub-issues, suggesting that B2B data sharing was not a top priority for them. Academia showed a 75 percent attainment, but this result is based on a single IG's comments, making it less representative of the sector.

The policy issue of cloud portability highlighted a significant divergence in preference attainment. NGOs and academia had mixed success, with preference attainment at 50 percent. NGOs like BEUC and academia groups such as IMT and LERU preferred more stringent legislative mandates, while business associations largely favored voluntary industry-driven standards. Business associations had the lowest preference attainment at 10 percent, reflecting a significant departure from their preference for voluntary measures and minimal regulatory intervention. The final proposal introduced binding regulations, representing a compromise but not fully aligning with business preferences.

Overall, the total preference attainment scores reflect the varying degrees of influence and alignment among the interest groups across the three policy issues. NGOs had an average preference attainment of 64 percent, showing a strong influence in B2G and moderate in other areas. Business associations averaged 47 percent, indicating significant challenges in cloud portability but stronger influence in B2B data sharing. Academia averaged 63 percent, demonstrating robust engagement and influence, particularly in B2G data sharing.

Table 4: Total Preference Attainment

Total Preference Attainment					
Category	IG	Policy Issue I	Policy Issue II	Policy Issue III	Total Score
NGOs	AFS	3/6	2/2	1/2	6/10
	BEUC	5/6	2/4	1/2	8/12
	COM	5/6	n.f.	1/2	6/8
	Eurocities	4/6	n.f.	1/2	5/8
	OF	2/4	n.f.	1/2	3/6
Total Score		19/28	4/6	5/10	28/44
		68 %	67%	50%	64%
Business association	Biktom	1/2	3/4	1/4	5/10
	BSA	4/6	3/4	0/4	7/14

	CCIA	2/6	3/4	0/4	5/14
	DE	4/6	3/4	1/4	8/14
	EBF	4/6	2/4	0/4	6/14
Total Score		15/26	14/20	2/20	31/66
		58%	70%	10%	47%
Academia	CIPL	4/6	3/4	1/2	8/12
	LERU	5/6	n.f.	2/4	7/10
	LU	2/4	n.f.	0/2	2/6
	IMT	1/2	n.f.	2/4	3/6
	SE	2/4	n.f.	2/2	4/6
Total Score		14/22	3/4	7/14	24/40
		64%	75%	50%	60%

5.4. Hypothesis testing

As stated in the theoretical framework, due to the EC's limited resources, it often relies on external sources for expertise, citizen support and economic power, leading to an interdependent exchange with IGs (Klüver, 2013). This leads to an interdependent exchange with IGs (Klüver, 2013). Additionally, research indicates that IGs engaging in lobbying coalitions are more successful due to the impact of collective action (Klüver, 2011b). Consequently, the success of lobbying efforts depends on the IGs' ability to meet the EC's needs in these areas. The following section will test the hypotheses outlined in the theoretical framework.

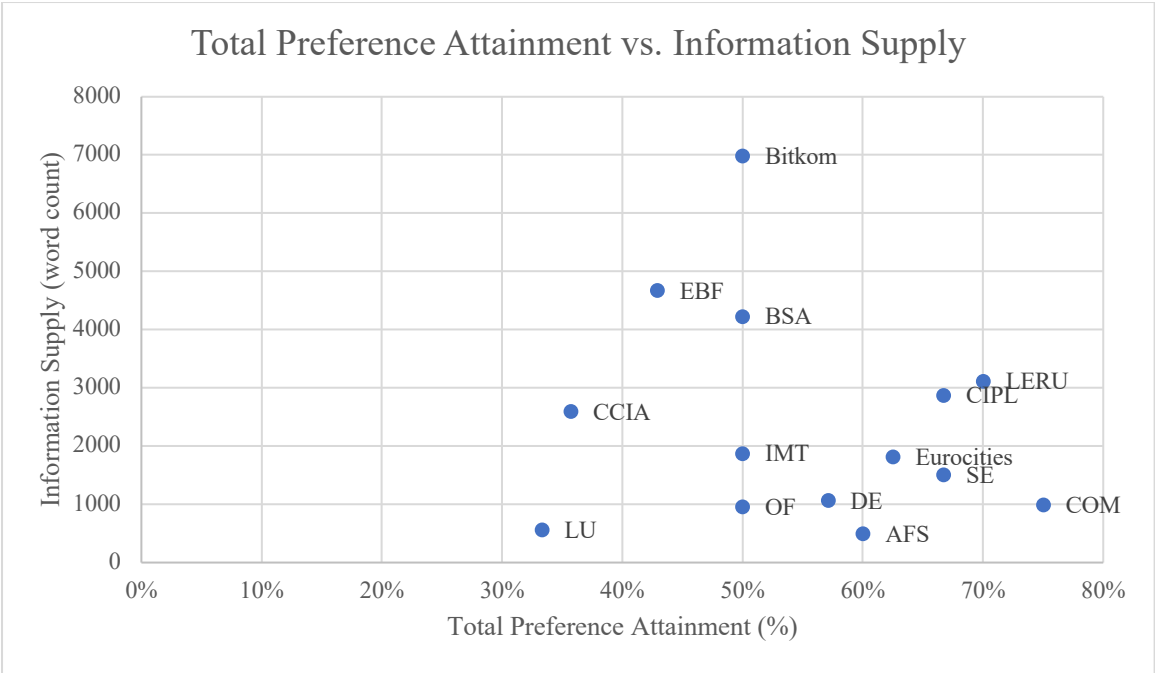
5.4.1. Information Supply

As outlined in the theoretical framework, the EC relies on IGs for crucial policy-relevant information due to its resource limitations. In return, these IGs gain influence. According to H1, the information provided directly affects the influence of an IG. To assess the information supply regarding the proposal, consultation contributions were analyzed. These contributions include detailed position papers with high technical and in-depth information on IGs' stances. The word count, excluding end notes, bibliographies, and repeated survey questions, measures the amount of policy-relevant information supplied. Table 14 (in the Appendix) displays the total word count dedicated to the consultation by various IGs.

Figure 3 reveals that Bitkom provided the EC with the highest amount of information. Based on the hypothesis that the provision of a significant amount of policy-relevant information leads to greater lobbying success, one would expect Bitkom to be the most successful. However, they did not achieve the highest total preference attainment scores. Instead, COM, an IG with a comparatively low amount of provided information, attained the highest preference score. LERU, which provided nearly half of the amount of information that Bitkom provided, scored second in total preference attainment.

This discrepancy suggests that the hypothesis — IGs are more likely to achieve their preferred outcome in the legislative debate when they provide a significant amount of policy-relevant information — does not hold strong support. Therefore, the hypothesis must be rejected, as the correlation between the volume of information provided and lobbying success is not consistent across different IGs.

Fig. 3: *Total Preference Attainment vs. Information Supply*



5.4.2. Citizen Support

Public opinion plays a pivotal role in the success of lobbying efforts, as outlined in the theoretical framework. Policymakers, who need to maintain electoral support, carefully consider input from both the public and IGs during policy deliberations (Rasmussen et al., 2017). IGs serve as intermediaries, effectively conveying the views of their constituents to policymakers (Bevan & Rasmussen, 2020; De Bruycker & Colli, 2023; Klüver & Pickup,

2018). Those advocating for positions widely supported by the public are perceived as more credible, thereby enhancing their political influence (De Bruycker & Colli, 2023).

To test the hypothesis on citizen support, public opinion of European citizens was measured through several Eurobarometer surveys from the announcement of the European Strategy for Data in February 2020 up to the proposal of the Data Act in February 2022. Eurobarometer surveys are the official polling instrument utilized by the European Parliament, the EC, and other EU institutions to regularly monitor public opinion in Europe on EU-related issues (European Parliament [EP], n.d.). However, only surveys were available that reported on policy issues I and II, thus not addressing the full scope of issues under investigation. This limitation means that while the data provides valuable insights into specific areas, it does not encompass the entire spectrum of policy issues being considered.

The Eurobarometer survey on “Attitudes towards the Impact of Digitalization on Daily Lives” (Kantar, 2020a) reported that 60 percent of respondents stated they would be willing to share personal data to improve public services, particularly in the areas of medical care and crisis response. This aligns with the views of NGOs, which advocate for broader B2G data sharing, particularly for public health improvements and crisis response. The IG that aligns particularly well with that position is Eurocities. It supports mandatory data sharing to enhance public services and respond effectively to crisis situations, reflecting the public's willingness to share personal data for these purposes as reported in the survey (Eurocities, 2021). Furthermore, the Eurobarometer survey on “Digital Rights and Principles” (Kantar, 2021) reported that 81 percent of respondents believe digital technologies will be crucial for accessing public services by 2030. Additionally, 82 percent find it useful for the EC to define and promote a common European vision on digital rights and principles (Kantar, 2021). This aligns with the advocacy positions of NGOs like AFS, BEUC, and Eurocities, as well as academia such as IMT and LERU, which emphasize the importance of digital technologies for public services and a unified European approach to digital rights. These groups advocate for a strong public interest justification for data sharing and a clear European vision on digital rights, resonating with the survey's findings.

Lastly, the Eurobarometer survey on “SMEs, Start-ups, Scale-ups, and Entrepreneurship” indicated that 76 percent of respondents, with 50 percent of them being either sole-founders or co-founders of SMEs, need to adopt digital technologies, though 62 percent face obstacles such as uncertainty about digital standards and regulatory challenges (Kantar, 2020b). This aligns best with the position of business associations. BSA and the European Banking Federation (EBF) emphasize the need for context-specific definitions and voluntary

data sharing frameworks, alongside strong protections and stakeholder discussions to address regulatory concerns, which directly speaks to the challenges faced by SMEs in adopting digital technologies. Additionally, Bitkom and DE support voluntary data sharing and stress the importance of clear and specific guidelines to protect business-sensitive data, aligning with the respondents' concerns about regulatory obstacles. By promoting policies that reduce regulatory complexity and provide clear, consistent standards, these groups aim to create a more favorable environment for SMEs to adopt and implement digital technologies effectively.

The high scores of NGOs on issues like data sharing for public services and robust data governance frameworks, coupled with strong public backing for improving medical care and crisis response, correlate with their high preference attainment in related policy issues. Specifically, NGOs such as AFS, BEUC, and Eurocities aligned their advocacy with the 60 percent of citizens willing to share personal data to enhance public services, achieving significant success in B2G data sharing with a 68 percent preference attainment. Similarly, business associations aligned with citizen support regarding SMEs need to adopt digital technologies, resulting in a high preference attainment of 70 percent in B2B data sharing. Academia, focusing on long-term issues benefiting the research sector, may not resonate as strongly with the public's immediate concerns, leading to lower preference attainment scores.

Overall, the hypothesis that public opinion significantly impacts lobbying success is supported by the data. IGs (NGOs and business associations) that align closely with public opinion on key digital policy issues achieve higher preference attainment scores, demonstrating the alignment between public support and successful lobbying efforts.

5.4.3. Economic Resources

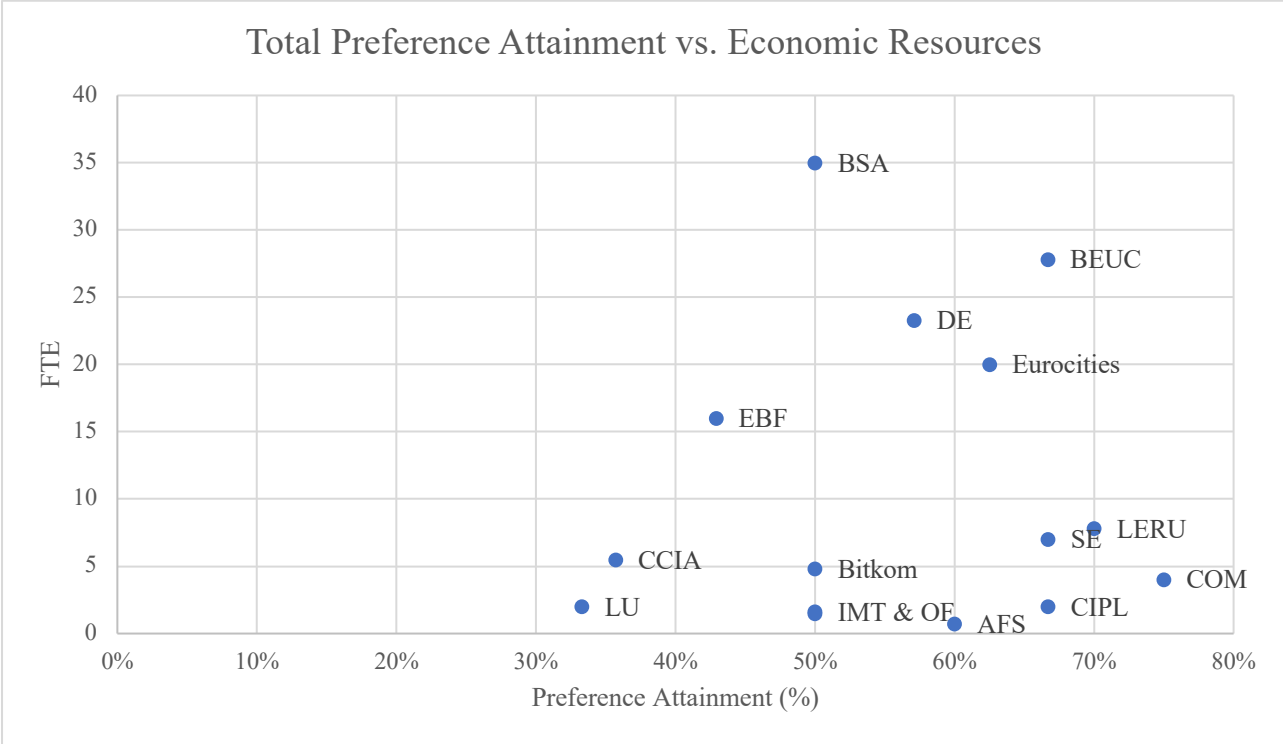
The theoretical framework posits that an IG's ability to influence policy proposals largely depends on their economic resources. With greater resources, groups can allocate more time, effort, and specialized staff to research, monitor policies, develop potential solutions, and effectively communicate this information to decision-makers (De Bruycker & Colli, 2023). Given the lack of comprehensive financial data on IGs, this research uses Full-Time Equivalents (FTEs) as a proxy measure for financial resources.

When analyzing individual IGs within each sector, specific details emerge. Among business associations, BSA had the highest FTE of 35.0, followed by DE with 23.3 and EBF with 16.0. Despite BSA's significant FTE, their preference attainment was not the highest among all IGs. In contrast, among NGOs, BEUC had the highest FTE of 27.8, followed by Eurocities with 20.0, COM with 4.0, OF with 1.6, and AFS with 0.7. Interestingly, COM, with

a relatively low FTE of 4.0, achieved the highest preference attainment score. In academia, LERU had the highest FTE of 7.8, followed by SE with 7.0, CIPL and LU both with 2.0, and IMT with 1.5. LERU, with an FTE of 7.8, achieved a high preference attainment score, second to COM. This discrepancy suggests that factors other than economic resources and human capital play significant roles in determining lobbying success. The high preference attainment of COM and LERU indicates that strategic factors, such as alignment with public opinion and effective advocacy, are crucial determinants of success.

Therefore, based on the strict testing of our hypothesis, we must reject the following hypothesis: *IGs endowed with substantial economic resources are more likely to achieve their desired policy outcomes compared to IGs with limited economic resources.*

Fig. 4: Total Preference Attainment vs. Economic Resources



5.4.4. Coalition Formation

As outlined in the theoretical framework, it's widely acknowledged that IGs can increase their influence in the dynamic landscape of EU policymaking by forming lobbying coalitions (Junk, 2020; Klüver, 2011b; Koch, 2023; Nelson & Yackee, 2012). To determine if an IG was part of a lobbying coalition, joint statements on the Data Act were examined. Thereby, two joint statements were identified, classifying AFS and CCIA in one coalition ([AFS] & [CCIA], 2023), and DE and EBF in another coalition ([DE] & [EBF], 2023). Furthermore, it was

identified that BSA (BSA, 2023) was also part of lobbying coalitions, but a separate one. The other IGs were not part of a lobbying coalition (see Table 5).

Table 5
Overview Interest Groups Preference Attainment in Different Coalition Types

IG	Total Preference Attainment	Coalition Type
AFS	60 %	Coalition 1 (same)
CCIA	35,7 %	Coalition 1 (same)
DE	57,1 %	Coalition 2 (same)
EBF	42,9 %	Coalition 2 (same)
BSA	50,0 %	Active in Coalition
Bitkom	50,0 %	Non-Active in Coalition
COM	75,0 %	Non-Active in Coalition
Eurocities	62,5 %	Non-Active in Coalition
OF	50,0 %	Non-Active in Coalition
IMT	50,0 %	Non-Active in Coalition
SE	66,7 %	Non-Active in Coalition
LU	33,3 %	Non-Active in Coalition
LERU	70,0 %	Non-Active in Coalition
BEUC	66,7 %	Non-Active in Coalition

The analysis of preference attainment scores revealed that Coalition 1 has the lowest mean preference attainment score at 47.85 percent, suggesting that IGs within this specific coalition were less effective in achieving their policy preferences compared to other groups. Coalition 2 and BSA, that was active in a coalition but not the same one, both have an average preference attainment score of 50.0 percent, indicating that IGs in Coalition 2 and those active in any coalition (but not necessarily the same one) were moderately effective in achieving their policy preferences. Interestingly, Non-Active in Coalition IGs have the highest mean preference attainment score at 58.24 preference attainment, suggesting that IGs not involved in any coalition were more effective in achieving their policy preferences than those in specific or general coalitions.

These findings challenge the hypothesis that IGs in coalitions are more successful. The data shows that Non-Active in Coalition IGs have the highest mean preference attainment score,

contradicting the hypothesis. Additionally, Coalition 1 having the lowest mean preference attainment score further weakens the hypothesis. Given that the mean preference attainment scores for IGs not part of any coalition are higher than those for IGs in any coalition, the hypothesis that IGs in coalitions are more successful does not hold strong support in this case and should be rejected based on the observed data.

Table 6: *Mean Preference Attainment Lobbying Coalitions*

Coalition Type	Mean Preference Attainment (%)
Coalition 1	47.85 %
Coalition 2	50.0 %
Active in Coalition	50.0 %
Non-Active in Coalition	58.24 %

6. Discussion and Limitations

The analysis reveals several key insights into the dynamics of IGs regarding their interdependent exchange with the EC and the status of lobbying coalitions and their effectiveness in the context of the Data Act policy formulation. The following discussion will compare these results to existing literature and reflect on the study's limitations.

Contrary to Klüver (2011b) research, the results indicate a weak correlation between the volume of information supplied and lobbying success. Despite COM and LERU providing less information compared to other IGs, they achieved the highest preference attainment scores. However, the research is limited in its assessment of information supply as it only measures the word count of submitted documents, without considering the quality or technical details of the information provided. This result might also highlight the potential influence of other factors such as timing, presentation, and the specific needs of policymakers (De Bruycker & Hanegraaf, 2024).

Alignment with public opinion emerged as a significant factor in lobbying success. NGOs advocating for broader B2G data sharing, particularly for public health improvements and crisis response, resonated with the public's willingness to share personal data for these purposes. The strong public backing, as reflected in the Eurobarometer surveys, likely enhanced the credibility and influence of these NGOs, leading to higher preference attainment. This underscores the importance for IGs to align their advocacy efforts with public sentiment to bolster their lobbying effectiveness (De Bruycker & Hanegraaf, 2024; Rasmussen et al., 2018). This finding is also

supported by Rasmussen et al. (2018), who note that policymakers are more likely to consider input from IGs that reflect public opinion, as it helps them align their decisions with the electorate's preferences.

Contrary to theoretical expectations, the analysis showed that economic power, measured by FTEs, did not correlate strongly with lobbying success (Klüver, 2011b). NGOs with lower economic resources achieved higher preference attainment than business associations with substantial resources. This indicates that factors such as strategic advocacy and alignment with public interests can outweigh the advantages of greater economic power. Although FTEs are commonly used in research to determine economic resources, including other factors, particularly financial capacity, would provide a more comprehensive understanding of economic resources and their utilization for lobbying success.

Regarding coalition formation the data challenges the hypothesis that IGs in coalitions are more successful. Non-Active in Coalition IGs exhibited the highest mean preference attainment at 58.24 percent, suggesting they were more effective in achieving their policy preferences compared to IGs in specific or general coalitions. This finding contrasts with Klüver's (2011b) and Junk's (2020) assertion that coalition-building enhances lobbying success by pooling resources and presenting a united front. Possible explanations for this phenomenon could include the individual strategic capabilities of IGs, their specific lobbying tactics, or the nature of their policy goals, which might align more closely with the EC's priorities even without coalition support (Dür, 2009; Dür et al., 2015). The work of Beyers and Braun (2014) supports this view, suggesting that the effectiveness of lobbying can depend heavily on the specific context and the strategies employed by IGs. This indicates that while coalitions can be beneficial, they are not always necessary for successful lobbying. Additionally, an IG's active engagement and collaboration within a coalition is a factor that needs to be considered. This could explain why some IGs, despite participating in a coalition, did not achieve higher preference attainment scores compared to those not engaged in a coalition (Junk, 2020). Methodologically, it is important to consider that the reliance on joint statements to identify coalition participation may overlook informal or less visible coalition activities, suggesting the need for more comprehensive data collection methods, including interviews. Additionally, while mean preference attainment scores provide useful insights, further statistical testing could determine the significance of observed differences, ensuring the robustness of the analysis.

In general, this study faces several limitations that should be acknowledged. One major limitation is the potential bias in the selection of IGs, which may not be fully representative of

all IGs active in the EU, potentially skewing the results. Furthermore, not every IG commented on every issue, which lowered their overall scores. Absence of comments can distort results, as it may indicate strategic restraint rather than high preference attainment. The reliance on an ordinal scale to quantify preference attainment risks losing vital details and meaning, and the codification of preferences is subject to researcher bias, despite efforts to ensure transparency and consistency. Addressing these limitations in future research will contribute to more effective policymaking processes.

All in all, these insights suggest that the lobbying success of IGs is significantly amplified when combined with public support. This nuanced understanding calls for a reevaluation of traditional lobbying theories that prioritize economic power and coalition dynamics. It underscores the need for IGs to actively engage with the public and align their lobbying efforts with public sentiment to maximize their influence.

7. Conclusion

This study provides critical insights into the factors influencing lobbying success in the context of the Data Act policy formulation. It aimed to analyze how the interdependent exchange between the EC and IGs explains the variation in lobbying success during the policy formulation phase of the Data Act.

The analysis revealed that IGs not participating in any coalition achieved higher policy preference attainment compared to those in coalitions. Additionally, a weak correlation between the supply of information and lobbying success was found. Furthermore, alignment with public opinion and strategic advocacy emerged as significant factors, while economic resources did not strongly correlate with lobbying success.

The extent to which the interdependent exchange between the EC and IGs explains variation in lobbying success is dynamic and context dependent. While information supply, economic resources, and coalition participation were not strong predictors of success, strategic advocacy aligned with public interests played a crucial role.

In summary, the research highlights the critical role of public opinion and effective advocacy in policy influence, questioning the notion that economic resources and coalition formation predominantly determine lobbying success.

7.1. Implications

These findings suggest that policymakers should consider public opinion and the nuanced preferences of various stakeholders to achieve equitable and effective outcomes. For IGs, the study highlights the importance of strategic advocacy that aligns with public interests. In terms of theoretical implications, it needs to be reconsidered if economic resources and coalition formation are still predictable variables in a high-paced policy field as digital policy where consumer and public voices seem to be equally heard and be considered.

7.2. Recommendations

Future research should focus on several key policy areas to enhance our understanding of lobbying dynamics. Detailed studies on the role of coalition dynamics are needed to explore how different coalitions impact lobbying success. Additionally, examining the specific lobbying strategies employed by IGs and conducting comparative studies across various policy areas or political systems would provide valuable insights. There is also a need for more precise measurement of lobbying coalitions to capture informal and less visible activities. Further qualitative research is essential to understand why non-coalition IGs were more successful, including an examination of their individual lobbying strategies, resource allocation, and the specific nature of their policy goals. When assessing information supply, future studies should implement qualitative content analysis to evaluate the depth and technicality of the information provided. Lastly, rather than relying solely on FTEs as a measure of economic resources, future research should use total budget and other financial data if available, to gain a more comprehensive understanding of the resources at IGs' disposal.

8. Literature

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Appendix A: Policy Issue I: B2G data sharing

Table 7: Preferences B2G Data Sharing

Interest Group	Preference Target
AFS ([AFS], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest" - Exercise caution to prevent the misuse of the "public interest" argument to access private data protected by trade secrets legislation or GDPR <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Voluntary measures to facilitate data sharing <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Contractual arrangements and clarity - Showing best practices
BEUC ([BEUC], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest" <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Mandatory data sharing defined under specific circumstances - Data from telecom companies should be compulsory in specific use cases. - Banks in the financial sector must share data related to frauds with authorities. - In the energy sector, share aggregated energy consumption data to inform decisions on energy infrastructure and investments. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Businesses should provide the public sector with free data. - Implement specific safeguards for mixed data sets and mandate the sharing of anonymized or aggregated data as the default rule. - Provide clear indications of the intended use of the data.

<p>COM ([COM], 2021)</p>	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest" with a strong interest justification <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Voluntary, only compulsory in clearly defined public interest use cases <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Businesses should provide the public sector with free data. - There should be a requirement for recipients to make the aggregated data available to the public under open licenses.
<p>Eurocities (Eurocities, 2021)</p>	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest" by involving city authorities - Ensure the public interest definition considers regional and local needs - Specify situations where data must be shared for free and promptly, such as during emergencies, crisis management, prevention, and resilience efforts. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Mandatory data sharing defined under specific circumstances <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - In case of public emergencies data should be made available for free
<p>OF ([OF], 2021)</p>	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest" with a strong interest justification <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - N.f.

	<p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - There should be a requirement for recipients to make the aggregated data available to the public under open licenses.
<p>Bitkom (Bitkom, 2021)</p>	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Suggest fair market prices for data but also consider other types of compensation, such as increased know-how and public recognition, excluding tax incentives due to administrative complexity and misalignment with procurement practices. - Support including an option for preferential rates or waivers for specific purposes, such as education, social services, crisis management, or health care.
<p>BSA ([BSA], 2021)</p>	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - The public interest definition should be context-specific, balanced against business costs and risks, and clearly defined to avoid broad and discretionary data-sharing requirements that could undermine trust and business interests <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Voluntary data sharing - If mandatory data-sharing mandates are introduced, they should be directed at entities that own and control the data, not at processors acting on behalf of customers, with strong protections for intellectual property and business-sensitive information. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Suggests model contractual terms and fair compensation for data sharing.

<p>CCIA ([CCIA], 2021)</p>	<p>➔ Wants to remain status quo, no need for additional EU action</p> <p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Advocate for a context-specific approach to defining "public interest." - Emphasize that the definition should be balanced against the costs and risks to businesses. - Highlight that a one-size-fits-all approach could jeopardize intellectual property and business confidentiality. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Strongly supports voluntary sector-specific initiatives and cautions against general mandatory B2G data sharing, suggesting it is unsuitable for achieving the Data Act's policy objectives due to varied data needs across different sectors. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Call for a high-level framework that sets out conditions and safeguards for voluntary data sharing, including protections for personal data and intellectual property rights. - This framework should help facilitate sector-specific initiatives and encourage collaboration between private and public sectors.
<p>DE ([DE], 2021)</p>	<p>➔ Wants to remain status quo, no need for additional EU action</p> <p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Emphasize the importance of pre-specifying the data and purposes for which it can be requested, minimizing the amount of data shared to what is strictly necessary. - Stress the need to protect business-sensitive data and proprietary technologies from mandatory sharing requirements. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Voluntary data sharing

	<ul style="list-style-type: none"> - If mandatory data sharing it should be limited to data specified in advance in a catalogue, with clear purpose limitations and data minimization principles. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Preferred financial compensation is market prices, but depending on partnerships, other arrangements such as marginal costs or fair return on investment could be considered.
EBF ([EBF], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Requires a clear definition involving in-depth stakeholder discussions, applicable in specific well-defined use cases. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Voluntary data sharing - If mandatory sharing it should be limited to emergencies or crises ('state of need'). <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Increased public data availability for business purposes. - Providers benefit from a better data basis which is publicly accessible. - Reduced effort for providing additional information by using standardized formats or transfer mechanisms.
CIPL ([CIPL], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest" <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Supports voluntary arrangements and cautions against mandatory sharing. - Compulsory data sharing, if implemented, should be restricted to very specific and limited circumstances. - It must include clear requirements for fairness, transparency, reasonableness, and non-discrimination, while also considering

	<p>privacy, security, and the protection of business secrets and intellectual property.</p> <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Supports fair compensation schemes and voluntary data sharing with adequate safeguards.
IMT ([IMT], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Depending on the purpose, data may be provided at market price, preferential rate, or for free. - Dynamic, even real-time provision of all this data. - Effective sanctions for non-compliance with contractual/legal conditions.
LERU ([LERU], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest", , emphasizing that it should encompass data sharing for research and innovation purposes <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Create incentives for companies to share data (tax incentives, improving their know-how, conducting studies on the benefits of B2G data sharing). - Financial compensation should be limited to marginal costs to avoid becoming an obstacle to conducting research in universities.
LU ([LU], 2021)	<p><u>Definition of Public Interest</u></p>

	<ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - Voluntary data sharing - A voluntary framework with strong incentives can foster cooperation without compromising data quality and existing commercial practices. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - High safeguards
SE ([SE], 2021)	<p><u>Definition of Public Interest</u></p> <ul style="list-style-type: none"> - Establish a clear definition and scope of "public interest", , emphasizing that it should encompass data sharing for research and innovation purposes <p><u>Voluntary or Mandatory Data Sharing</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Incentives for Data Sharing</u></p> <ul style="list-style-type: none"> - Advocates for further incentives for the private sector to share data, including enhancing public reputation.

Table 8: Preference Attainment B2G Data Sharing

Preference Attainment:					
Category	IG	Definition of Public Interest	Voluntary or Mandatory Data Sharing	Incentives for Data Sharing	Total Score
NGOs	AFS	2/2	1/2	0/2	3/6
	BEUC	2/2	1/2	2/2	5/6
	COM	2/2	2/2	1/2	5/6
	Eurocities	1/2	1/2	2/2	4/6

	OF	2/2	n.f.	0/2	2/4
Total Score		9/10	5/8	5/10	19/28
				50%	
Business association	Biktom	0/2	0/2	1/2	1/6
	BSA	2/2	1/2	1/2	4/6
	CCIA	1/2	1/2	0/2	2/6
	DE	1/2	1/2	2/2	4/6
	EBF	2/2	2/2	0/2	4/6
Total Score		6/10	5/10	4/10	15/30
			50%		50%
Academia	CIPL	2/2	1/2	1/2	4/6
	LERU	2/2	2/2	1/2	5/6
	LU	n.f.	0/2	2/2	2/4
	IMT	n.f.	n.f.	1/2	1/2
	SE	2/2	n.f.	0/2	2/4
Total Score		6/6	3/6	6/12	14/22
		100%	50%	50%	

Appendix B: Policy Issue II: B2B Data Sharing

Table 9: Preference B2B Data Sharing

Interest Group	Preference Target
AFS ([AFS], 2021)	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Supports the development of voluntary model contract terms to facilitate B2B data sharing. - Believes that contractual arrangements between different data providers can be enhanced through clarification and standardized terms.

<p>BEUC ([BEUC], 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose a fairness test <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Voluntary agreements won't provide sufficient incentives for non-personal data sharing. - It is necessary to adopt specific requirements for mandating data sharing between companies to prevent data holders from applying monopoly prices, which would ultimately be passed onto consumers.
<p>COM ([COM], 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - N.f.
<p>Eurocities (Eurocities, 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - N.f.
<p>OF ([OF], 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - N.f.
<p>Bitkom (Bitkom, 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose a fairness test - Existing comprehensive B2B contractual clauses are sufficient to ensure fairness without needing a new fairness test. - Unfair imposition of contractual terms should be addressed using existing competition tools that allow case-by-case assessments. - The application of a fairness test involving data intermediaries is unclear and complex.

	<ul style="list-style-type: none"> - Current mechanisms and tools should be leveraged instead of introducing potentially redundant fairness tests. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Model contract terms should be used on a voluntary basis to facilitate data sharing without imposing additional regulatory requirements.
BSA ([BSA], 2021)	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose a fairness test - The introduction of a broad fairness test could increase litigation risks, leading to legal uncertainties and fragmentation of the Digital Single Market. - Larger businesses with more legal resources are likely to benefit from a fairness test, potentially to the detriment of smaller businesses. - Differing interpretations of the fairness test could further fragment the Digital Single Market. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Model contract terms should be applied on a voluntary basis. - Recommends relying on industry-developed best practices for model contract terms.
CCIA ([CCIA], 2021)	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose a fairness test - The assumption that a fairness test or a list of unfair contractual terms would increase data sharing is speculative. - Invalidation of contract clauses may disincentivize data collection, reducing data available for secondary access and use. - The fairness test should be limited to data indispensable for market entry or competition, where competition law cannot address the issue. - Stronger bargaining power alone should not trigger B2B data-sharing obligations.

	<p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Supports voluntary standard contractual terms for B2B data sharing, which can provide legal certainty and ease of implementation. - Model contract terms should reflect applicable EU rules relevant to B2B data sharing, including data protection, privacy, database rights, and data localization prohibitions. - Terms should be modifiable to meet the specific needs of the parties involved. - Development of model contract terms should involve close cooperation with companies and stakeholders to ensure their needs are addressed
DE ([DE], 2021)	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose a fairness test - The concept of a "fairness test" is considered excessively vague. - Compulsory access or mandatory terms and conditions could severely impact incentives to invest and innovate. - Uncertainty exists regarding how a fairness test would interact with the Common European Data Spaces and the Data Governance Act's provisions on data sharing intermediaries. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Voluntary model contract templates designed by the industry can facilitate data sharing. - Model contracts should be tools for guidance and support, not mandatory frameworks. - Maintaining flexibility in how businesses negotiate and agree on terms is crucial for fostering innovation and collaboration. -
EBF ([EBF], 2021)	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose fairness test - There is significant uncertainty regarding the content and implementation of the fairness test.

	<ul style="list-style-type: none"> - Questions arise about who will perform the fairness test and how it will be enforced. - Consideration must be given to the definition of "business" and whether all types of businesses, including small self-employed entities, should have access to bank data. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Discusses the need for voluntary data sharing but argues that it alone is insufficient to unlock the full potential of a data-driven economy. - Advocates for standardized interoperability frameworks to facilitate low-cost data sharing and the development of structures that allow data computation without disclosing the actual data.
<p>CIPL ([CIPL], 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Any fairness test for B2B data sharing should be consistent with the GDPR and other legal regimes. - Collaboration with relevant stakeholders is essential in drafting fairness tests, utilizing lessons learned and best practices from other contexts like the open-source community. - Emphasis on contractual freedom should remain the underlying basis for B2B data sharing. <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - B2B data sharing should continue to be based on voluntary arrangements with proper contractual agreements in place. - Voluntary mechanisms and tools should be supported and explored to facilitate data sharing.
<p>IMT ([IMT], 2021)</p>	<p><u>Fairness Test</u></p> <ul style="list-style-type: none"> - Oppose a fairness test <p><u>Model Contractual Terms for Voluntary Use</u></p> <ul style="list-style-type: none"> - Voluntary measures to facilitate data sharing -

LERU ([LERU], 2021)	<u>Fairness Test</u> - N.f. <u>Model Contractual Terms for Voluntary Use</u> - N.f.
LU ([LU], 2021)	<u>Fairness Test</u> - N.f. <u>Model Contractual Terms for Voluntary Use</u> - N.f.
SE ([SE], 2021)	<u>Fairness Test</u> - N.f. <u>Model Contractual Terms for Voluntary Use</u> - N.f.

Table 10: Preference Attainment B2B Data Sharing

Preference Attainment				
Category	IG	Fairness Test	Model Contractual Terms	Total Score
NGOs	AFS	n.f.	2/2	2/2
	BEUC	2/2	0/2	2/4
	COM	n.f.	n.f.	n.f.
	Eurocities	n.f.	n.f.	n.f.
	OF	n.f.	n.f.	n.f.
Total Score		2/2	2/4	4/6
		100%	50%	
Business association	Biktom	1/2	2/2	3/4
	BSA	1/2	2/2	3/4
	CCIA	1/2	2/2	3/4
	DE	1/2	2/2	3/4

	EBF	1/2	1/2	2/4
Total Score		5/10	9/10	14/20
		50%		
Academia	CIPL	2/2	1/2	3/4
	LERU	n.f.	n.f.	n.f.
	LU	n.f.	n.f.	n.f.
	IMT	n.f.	n.f.	n.f.
	SE	2/2	n.f.	n.f.
Total Score		4/4	1/2	3/4
		100%	50%	

Appendix C: Policy Issue III: Improving Portability for Business User of Cloud Services

Table 11: *Preferences Improving Portability for Business User of Cloud Services*

Interest Group	Preference Target
AFS ([AFS], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - If new legislation: High-level principle(s) recognizing the right for cloud service. - Urges policymakers to consider the impact on startups and avoid creating new administrative burdens. - Emphasizes the need to view new data legislation through the lens of an entrepreneur to ensure it does not create additional red tape.
BEUC ([BEUC], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Need for legislation. - If legislation: more specific set of conditions of contractual, technical, commercial, and economic nature, including specification of the necessary elements to enable data portability.

COM ([COM], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> ○ N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - If new legislation: High-level principle(s) recognising the right for cloud service
Eurocities (Eurocities, 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - If legislation: More specific set of conditions of contractual, technical, commercial and economic nature, including specification of the necessary elements to enable data portability
OF ([OF], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Need for legislation - If new legislation: High-level principle(s) recognising the right for cloud service
Bitkom (Bitkom, 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - Considers the SWIPO Codes of Conduct to be a useful, versatile, and promising set of rules for addressing cloud service portability. - Believes that effective data portability requires substantial standardization efforts, particularly concerning tagging, describing data, and defining standardized interfaces and data formats. These efforts should be driven by the industry itself, as exemplified by projects like GAIA-X. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - No additional legislation needed

	<ul style="list-style-type: none"> - Argues that cloud service providers already offer data portability processes to remain competitive and that existing contractual practices are sufficient. - If legislation: Supports the introduction of a right to portability as a high-level principle rather than through mandatory regulatory measures. Emphasizes that the implementation details should be left to market participants.
BSA ([BSA], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - Supports existing initiatives such as the SWIPO Code of Conduct and ISO 19941 standards for cloud interoperability <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Emphasizes voluntary data sharing based on contracts, leveraging industry-developed best practices such as the Linux Community Data License Agreement and the Open Use Data Agreement. - Believes voluntary frameworks are more effective and less likely to cause negative market effects.
CCIA ([CCIA], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - Supports the SWIPO Codes of Conduct for cloud infrastructure and software switching. - Highlights the technical complexities and costs associated with data portability and stresses the need for practical solutions that support innovation and flexibility in the cloud services market <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Supports voluntary measures and guidelines to improve cloud service portability, rather than mandatory regulations. - Emphasizes the importance of allowing time for the voluntary SWIPO Codes to demonstrate their effectiveness. - Warns that introducing new mandatory technical specifications could complicate the implementation of existing voluntary codes and stifle innovation.
DE ([DE], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p>

	<ul style="list-style-type: none"> - Any data portability requirements must be proportionate and consider sectoral differences and the various uses of cloud services. - SWIPO and open standards, developed among industry-led initiatives, are best positioned to address this level of complexity and ensure fairness and transparency. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - No additional legislation - Supports industry codes of conduct like SWIPO and open standards developed by industry-led standard-developing organizations and fora/consortia as the best approach to address the complexity of cloud portability. - If legislation: Advocates for high-level EU principles recognizing the right to cloud service portability but opposes mandating technical specifications. Believes implementation details should be left to market participants.
EBF ([EBF], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - Supports the development and provision of tools that facilitate data portability, including standardized interfaces (APIs) and secure communication mechanisms. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Supports the use of voluntary frameworks like the SWIPO Codes of Conduct and suggests leveraging existing initiatives and industry standards to enhance data portability.
CIPL ([CIPL], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Advocates for collaboration with industry and other stakeholders to develop and promote standards that ensure interoperability and portability of data. - CIPL believes that legislative action may be premature and could have unintended restrictive consequences.

	<ul style="list-style-type: none"> - If legislation: High-level principle(s) recognizing the right for cloud service portability.
IMT ([IMT], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - SWIPO Codes of Conduct are not suitable to address cloud service portability. - Codes of conduct could be an acceptable standard, but in practice, self-regulation is non-existent. - Presence of non-European players with specific interests and the absence of civil society complicates the consideration of the European general interest in practice. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Need for EU legislation: the right to portability must be extended to all users, whatever their legal status. - If legislation: more specific set of conditions of contractual, technical, commercial, and economic nature, including specification of the necessary elements to enable data portability. - SWIPO Codes provide a suitable baseline for legislation
LERU ([LERU], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - Supports the implementation of the FAIR (Findable, Accessible, Interoperable, Reusable) principles for all data stakeholders to ensure data quality and interoperability. - Emphasizes the need for secure storage infrastructures, particularly for research data and sensitive non-public data generated by public authorities. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Suggests a provision that ensures cloud users have the right to port their data in a structured, widely used, and machine-readable format, based on the SWIPO Codes of Conduct.
LU ([LU], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Neutral about mandatory approach

SE ([SE], 2021)	<p><u>Existing Interoperability Standards and Compliance</u></p> <ul style="list-style-type: none"> - N.f. <p><u>Voluntary or Mandatory Portability Frameworks</u></p> <ul style="list-style-type: none"> - Need for EU legislation - Highlights the importance of legal certainty for users to switch data and applications between cloud providers or back to on-premise systems without facing barriers. This is crucial for the research sector, which increasingly relies on cloud services for data processing.
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Table 12: *Preference Attainment Improving Portability for Business User of Cloud Services*

Preference Attainment				
Category	IG	Existing Interoperability Standards and Compliance	Voluntary vs. Mandatory Portability Frameworks	Total Score

NGOs	AFS	n.f.	1/2	1/2
	BEUC	n.f.	1/2	1/2
	COM	n.f.	1/2	1/2
	Eurocities	n.f.	1/2	1/2
	OF	n.f.	2/2	1/2
Total Score		n.f.	6/10	5/10
				50%
Business association	Biktom	0/2	1/2	1/4
	BSA	0/2	0/2	0/4
	CCIA	0/2	0/2	0/4
	DE	0/2	1/2	1/4
	EBF	0/2	0/2	0/4
Total Score		0/10	2/10	2/20

		0%		10%
Academia	CIPL	n.f	1/2	1/2
	LERU	1/2	1/2	2/4
	LU	n.f	0/2	0/2
	IMT	0/2	2/4	2/4
	SE	n.f.	2/2	2/2
Total Score		4/4	1/2	7/14
		100%	50%	50%

Appendix D

Table 13: *Overview Documents per IG*

Interest Group	Documents
Allied For Startups (AFS)	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - AFS response to European Commission's consultation on the Data Act ([AFS], 2021)
Bitkom e.V.	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - Bitkom response to European Commission's consultation on the Data Act (Bitkom, 2021)
BSA – Software Alliance	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - BSA response to European Commission's consultation on the Data Act ([BSA], 2021)
Centre For Information Policy Leadership ([CIPL])	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a)

	<ul style="list-style-type: none"> - CIPL response to European Commission's consultation on the Data Act ([CIPL], 2021)
Computer & Communications Industry Association ([CCIA])	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - CCIA Europe response to European Commission's consultation on the Data Act ([CCIA], 2021)
DIGITALEUROPE	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - DIGITALEUROPE response to European Commission's consultation on the Data Act
Eurocities	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - Eurocities response to European Commission's consultation on the Data Act (Eurocities, 2021)
European Banking Federation (EBF)	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - EBF response to European Commission's consultation on the Data Act ([EBF], 2021)
League of European Research Universities ([LERU])	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - LERU response to European Commission's consultation on the Data Act ([LERU], 2021)
Open Future	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - Open Future response to European Commission's consultation on the Data Act ([OF], 2021)

Science Europe	<ul style="list-style-type: none"> - Consultation contribution ([EC], 2021a) - Science Europe response to European Commission's consultation on the Data Act ([SE], 2021)
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Table 14: *Information Supply IGs*

	IG	Consultation contribution
NGO	AFS	488
	BEUC	x
	COM	988
	Eurocities	1.810
	OF	951
Total Count		4.237
	Bitkom	6.982
	BSA	4.221
	CCIA	2.588
	DIGITALEUROPE	1.061
	EBF	4.671
Total Count		19.523
Academia	CIPL	2.870
	LERU	3.112
	LU	552
	IMT	1.870
	SE	1.497
Total Count		9.901

Table 15: Overview FTE per Interest Group

	IG	FTE in lobbying activities
NGO	AFS	0.7
	BEUC	27.8
	COM	4.0
	Eurocities	20.0
	OF	1.6
Total Count		54.1
Business associations	Bitkom	4.8
	BSA	35.0
	CCIA	5.5
	DE	23.3
	EBF	16.0
Total Count		84.6
Academia	CIPL	2.0
	LERU	7.8
	LU	2.0
	IMT	1.5
	SE	7.0
Total Count		20.3

Table 16: Overview of Interest Groups General Lobbying Interest

Note. Information retrieved from the European Transparency Register ([EU], n.d.).

	IG	Lobbying Interest
NGO	AFS	<ul style="list-style-type: none"> - Serves as the policy voice for startups in the EU and globally. - Aims to promote entrepreneurship and startups in various industries and commerce sectors. - Focuses on advancing education and science by fostering and growing entrepreneurship, particularly digital entrepreneurship.

	BEUC	<ul style="list-style-type: none"> - informs European consumers about the advantages of the internal market. - It assists in cross-border consumer disputes, where the trader and the buyer are in different member states of the European Union
	COM	<ul style="list-style-type: none"> - advocates for policies that expand the public domain and increase access to and reuse of culture and knowledge. - aim to limit the scope of exclusive copyright to sensible proportions, avoiding unnecessary restrictions on access and use.
	Eurocities	20.0
	OF	<ul style="list-style-type: none"> - think tank that develops new approaches to an open internet, aiming to maximize societal benefits from shared data, knowledge, and culture. - shape digital policies with future challenges in mind, working alongside EU institutions and civil society. - goal is to ensure the principle of openness is reflected in the European Union’s digital policy framework.
Business associations	Bitkom	<ul style="list-style-type: none"> - Bitkom is the voice of Germany's information technology, telecommunications, and new media industry. - Represents over 2,200 members, including nearly all global players, more than 1,000 small and medium-sized enterprises, and over 500 start-ups. - Prioritizes creating a favorable environment for innovation.
	BSA	<ul style="list-style-type: none"> - leading advocate for the global software industry, representing some of the world’s most innovative companies. - Focuses on cutting-edge data-driven innovation, including AI technologies.

		<ul style="list-style-type: none"> - BSA’s EU policy work includes areas such as Artificial Intelligence, privacy, cybersecurity, cybercrime, copyright, intellectual property, piracy enforcement, trade, and e-commerce.
	CCIA	<ul style="list-style-type: none"> - is an international, not-for-profit association representing a diverse range of firms in the computer, communications, and internet industries. - Advocates for a thriving European digital economy.
	DE	<ul style="list-style-type: none"> - Represents the digitally transforming industries in Europe. - Aims for a European Union that supports digital technology industries and benefits from the jobs, innovation, and economic advantages they provide. - Addresses societal challenges through digital advancements. - Mission is to create a business, policy, and regulatory environment in Europe that best supports this vision on behalf of its members.
	EBF	<ul style="list-style-type: none"> - The EBF represents the European banking sector, uniting national banking associations from 45 countries. - Committed to fostering a thriving European economy with a stable, secure, and inclusive financial ecosystem. - Aims to support a flourishing society where financing is accessible to citizens, businesses, and innovators.
Academia	CIPL	<ul style="list-style-type: none"> - global data privacy and cybersecurity think tank within the law firm of Hunton Andrews Kurth. - promotes thought leadership and develop best practices for effective privacy protections and the responsible use of personal information. - Facilitates constructive engagement between business leaders, privacy and security professionals, regulators, and policymakers worldwide.

	LERU	<ul style="list-style-type: none"> - association of twenty-four leading research-intensive universities. - shares the values of high-quality teaching and internationally competitive research. - advocates for education that pushes the frontiers of human understanding, creates new knowledge through basic research, and promotes research in partnership with industry and society.
	LU	<ul style="list-style-type: none"> - ranked among the world's top 100 universities. - United in efforts to understand, explain, and improve the world and human condition
	IMT	<ul style="list-style-type: none"> - public institution of scientific, cultural, and professional nature - its missions include higher education, scientific and technological research, technology transfer, support for innovation and economic development, dissemination of scientific and technical culture, particularly in areas relevant to industry and services. - It focuses on management, economic and social aspects of technological development and innovation, electronic communications and information technologies, energy, materials, and industrial environment.
	SE	<ul style="list-style-type: none"> - aims to promote the collective interests of Europe's research funding and research-performing organizations. - It supports its members in fostering European research and strengthens the European research area through direct engagement with key partners, informed by the scientific community's reflections on policies, priorities, and strategies.