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Policy learning infrastructure at EU level – stakeholders and their policy learning opportunities in the case of the Youth Guarantee

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Policy making at EU level is often described as a 'semi-pluralist' system in which an ever-expanding set of societal actors have access and try to take influence in EU policy making (Schmidt, 2006). A large number of private and public stakeholders are involved in constant processes of bargaining and arguing for spreading their knowledge, experiences and ideas about how a problem or an issue should be handled in the most appropriate way (Richardson & Mazey , 2015). This relates to Peter Hall's definition of policy learning as "a deliberate attempt to adjust goals and techniques of policy in response to past experiences and new information" (Hall 1993). Policy learning thus refers to the ways in which policy systems generate and use knowledge about the rationales, design, operation and impacts of policies. An important aspect of policy learning is that it generally involves learning of a number of organizations; it is a form of collective learning. What is being learned will depend on the problem at hand and characteristics of the 'learning organization' and its environment; or in other words the policy learning infrastructure. This environment of the 'learning organization' consists of the relation of the organization with other knowledge holders, the functional system of which the organization is part and of course society as a whole: the values, beliefs, opinions (Kemp & Weehuizen, 2005:7). The policy learning infrastructure of interest groups at the EU level is the focus of the following paper.

EU's institutional complexity provides numerous potential fora for policy learning. Participation of interest groups in EU policy learning increased dramatically over time because of the extended scope of EU policy competencies. The more public policy came to be decided at the EU level, the more groups direct their attention and activities to this level (Mazey & Richardson, 2006); and the more the policy making legitimacy of the EU has been challenged, the more the EU Commission (EC) has mobilized stakeholder participation in the policy making process (Mazey & Richardson, 2015:15).

To handle the plethora of stakeholder participation, the EC has developed sets of informal and formal procedural mechanisms which bring actors together in ad hoc or permanent relationships of different kinds. These procedures regulate the interactions with outside constituencies in a way that fulfils the Commissions' strategic objectives. The Commission is in great need of interest groups as sources of information, as support in policy learning and legitimating EU policy (Mazey & Richardson, 2001). Also interest groups have an interest in stable procedural settings with the EC for informing themselves about and influencing EU policy. Interest groups thus exchange their resources (e.g. information) for political influence.

The purpose of this paper is to illuminate the conditions for key stakeholders at the European level (EU policy makers and interest groups) under which policy learning takes place. It is about i) EU institutions need of resources, ii) interest groups opportunities to maintain, gain or even increase their role in EU policy learning procedure and iii) institutional settings to organize this policy learning. This will be done by interviewing representatives of EU level interest groups and of the EC and the EU Parliament about policy learning conditions in the case of the Youth Guarantee (YG). Given the great concern about youth unemployment in most countries, the YG can be seen as a case where mobilization and participation of stakeholders should be rather favorable for interest groups dealing with youth issues and the conflict potential generally being rather low.

The following questions will guide the paper:
1. What do conditions for policy learning look like for different interest groups?
2. In what way do institutional settings promote or constrain policy learning?
3. Are certain interest groups facing several constraining demand-side factors?

Analytically, we use the distinction between supply-side and demand-side factors (Mahoney, 2004) in the determination of interest groups possibilities to engage in policy learning processes. Supply-side forces are those interest specific factors (resources) that enable groups to become active in the policy learning process (e.g. financial resources, political support, the groups' size, knowledge and type of information). Previous research on EU interest groups has illuminated the role of supply-side factors (e.g. Schneider and Baltz 2003) whereas stakeholders' different institutional preconditions (demand-side) are often a neglected field. Interest groups however, do not lobby in a vacuum and demand-side factors are activities by institutions that influence the level and nature of interest group activity (e.g. rules for access to policy making processes) (Mahoney, 2004). Studying preconditions for policy learning is highly relevant since it directs attention at tools and processes in policy making, bolstering some and suppressing others. The general assumption would be that both forces are

complementary: where interests mobilize, governments respond by guiding their activities toward certain policy areas. Yet, not all interest groups are equally endowed with supply-side resources and one would expect some groups to be more influential than others. In addition, demand and supply-side factors will also depend on issue characteristics, thus, if a policy issue is highly controversial or not or its degree of technicality. Given the low controversial potential of the YG we would assume that policy learning conditions in this case promote the engagement of various types of interest groups helping to formulate and push EU policies to the MS.

This paper continues with a theoretical review of demand side and supply side factors, continues to describe central features of the YG and outlines then the empirical data. The opinions of the stakeholders regarding their role, strength and obstacles in influencing policy learning will be described and analyzed with identifying several patterns of demand side obstacles that create uneven opportunities to participate in the EU policy making game. It should also be mentioned that the paper will not discuss the positions of the stakeholders regarding the Youth Guarantee but focuses on conditions and structures that enable policy learning.

Policy learning conditions: demand and supply side factors

Demand side factors

There is a huge demand for policy-relevant information in the EU resulting from the fact that EU decision-makers are understaffed, underresourced and pressed for time (van Schendelen 2005). The EC , as other public officials, has incomplete information on the policy problems they want to tackle, is in constant need of information regarding the technical feasibility of their plans and political opposition to them (Wonka 2015), but also needs information on the regulatory and political situation in the member states. The EC is therefore dependent on reliable and valid information from external actors. Specific interest groups are generally quite well informed about policy problems in the MS related to their sector or industry and are therefore relevant information providers (Beyers 2004). Yet, obtaining relevant information and assessing its value is a challenge for the EC; the number of interest groups seeking access to policy learning processes is enormous and the way in which interest groups reveal information is not necessarily neutral.

To gain information the Commission relies on several sources: on internal specialists but also European and national, regional and local actors or experts. To avoid a bias in what type of information is delivered, the EC attempt to diversify the supply of interest groups participating in policy learning to avoid becoming entirely dependent on a single interest. Open consultation processes for example are supposed to stimulate a broad range of interests to engage as well as

deliberative committees or networks that intend to bring together a variety of competing interests (e.g. national administrations, national and European agencies as well as private actors (Wonka 2015, Broscheid & Coen 2003, 2007; Mazey & Richardson 2006, Beyers 2004).

The large number of interest groups demands some type of regulation and several strategies employed by the EC to regulate stakeholders' participation have been identified: these include the creation of insider vs outsider stakeholders, the creation of open gatherings/consultations and closed venues, or thick vs thin institutions (Mazey & Richardson, 2015:432), where the former consists of e.g. large conferences and the latter of meetings were only the key actors are present. In the early stage of the policy formulating process, consultative processes are often more open and inclusive whereas the subsequent formulation of the detailed proposal usually takes place within committees or bilateral meetings "within the myriad of formal and informal advisory committees and working parties in the Commission" (Mazey & Richardson, 2015:432).

The power the EC has in creating procedures has been criticized for favoring some stakeholders and excluding others. The Commission frames policy communities and encourages stakeholder participation since it has the possibilities to "build coalitions in favor of its own notions of desirable policy change . . . by assisting the formation of networks of "relevant" state and non-state actors, and by "massaging" the way that these networks operate' (Richardson, 1996/2001:16). Thus, by "seating the appropriate stakeholder at the seats" (Mazey & Richardson, 2001:3), the Commission can reduce resistance to their proposals and avoid blame for subsequent policy failures. In a study of civil society groups, Mahoney (2004) analyzed how the creation of Commission consultative committees fostered institutional opportunities and lobbying activity for societal interest groups. One of the results is that the Commission has affected interest activity by selecting and enhancing the influence of the groups most in-line with its agenda. Broscheid & Coen (2003) stress that institutionalized rules are not similar for all groups. They make the distinction between insider and outsider lobbying, the first one being interest groups with legitimate consultation rights or interest groups that are consulted because they are sympathetic to the EC's preferences. The selection of these insider interest groups is managed and organized into a wide variety of committees, working groups, conferences, and other policy forums whereas outsiders lack access to these kinds of venues. They state that although the Commission attempts to be open and transparent in its interaction with societal interests, nevertheless a core of insiders has been established. They talk about an elite pluralist system in the form of forums to which 'access is generally restricted to a few policy players, for whom membership is competitive and strategically advisable' (Broscheid & Coen,

2003:168).Mazey & Richardson (2015) go so far to claim that there are attempts by the Commission to structure and institutionalize promiscuous behavior of interest groups (2015:430).

Supply side factors

In general, interest groups are in a good position to take advantage of the Commissions' information deficit. They can supply information to decision-makers in exchange for access to the policy learning process with the goal of having their voices heard and, ultimately, influencing the EU policy-making process (Chalmers 2013). Yet, it has been stressed that interest groups have to learn to manage their policy environment (Coen 2007). They need to establish an organizational capacity that makes it possible to co-ordinate potential ad-hoc political alliances, to develop access to new policy learning venues while reinforcing existing collective and national political channels. As has been pointed out, not all interest groups are able to mobilize and represent their preferences equally well (Mahoney 2004, Mazey & Richardson 2001). In general it is assumed that groups with more resources should have more influence than groups with few resources.

One strategy applied by interest groups mentioned of several authors is to develop a broad political profile across a number of issues, or in other words establishing a reputation that will help them to gain access to the closed decision-making arenas or thick institutions (Bouwen & McCown, 2007; Beyer & Kerremans, 2007; Mahoney, 2008; Coen, 2007). Reputation relates to the supply of reliable information that is crucial for EU policy making (Coen, 2007, in Mazey & Richardson, 2015) and Broscheid & Coen (2003) stress that "in Brussels, the key to successful lobbying is not political patronage or campaign contributions, but the provision of information." Reputational strength also is related to representation of broad ranges of constituents since the EU Commission is more likely to listen to a group that can claim to represent large majorities of important groups (Mahoney, 2004).

Chalmers (2013) studied the type of information that interest groups sent to decision-makers and the tactics used to do so. The former can range from technical data and expert knowledge, to legal information, to information about the economic and social impact of a proposed policy, whereas information tactics can include so-called 'outside' tactics such as mobilizing citizen support behind a policy as well as "old-fashioned shoe-leather strategies like writing a letter, making a phone call or meeting over dinner or drinks" (p. 40). He found that tactics are more important than the information they provide. Strategies are also mentioned by Coen (2007) who point to how institutional conditions can alter the political nature of many interest groups with increased cross-border activity, joint ventures, mergers and political alliances. As a result, interest groups are able to pool resources by exploiting and/or creating new lobbying venues. Concentrating resources might be

another tactic. Interest groups might focus on specific parts of the policy making cycle, for example on the stage of agenda-setting and formulation of EU policies at the European institutions, the implementation of policies and 'day-to-day' regulatory monitoring in the member states and some interest groups might attempt to manage the whole policy process.

Influence may also vary according to the type of actor, namely whether or not a group defends diffused or concentrated interests (Dür & De Bièvre, 2008; Mahoney, 2008). It has been argued that diffused interests (defined as collective interests held by large numbers of individuals, Pollack 1997) are more difficult to organize than concentrated interests. Yet, it is also argued that groups defending diffused interests may have an advantage whenever they can make use of grassroots members and the possession of the "moral high ground".

In summarizing, demand side factors can promote but also constrain stakeholders' access to policy making but are not the only decisive factor. Organization level attributes are also important. The more essential the information or support of the stakeholder the more access to policy making will be possible.

Youth unemployment, what kind of policy area?

Competencies for employment policies belong to the member states and the treaties do not allow for harmonization measures in employment policies. Yet, the EU can take incentive and support measures to facilitate exchanges of information among Member States, e.g. to combat unemployment, and to support pilot projects to try out innovative approaches (Article 149 TFEU).

Tracking the origin of the YG (as most other initiatives) is not easy. YG schemes were already introduced in the Nordic countries in the 1980s and 1990s and served (together with other national examples) as inspiration for the Commission's work. Many steps and actions led to Commission's proposal from 2012. The Council Conclusions on youth employment[1] from 2011 stressed the situation of young people who are neither in employment nor in education or training (NEETs) and recommended Member States to develop approaches that help young people into employment similar to those already developed in some Member States. In the preparation for the budget 2012, the European Parliament backed up this approach and asked the Commission to implement a preparatory action for supporting the setting-up of Youth Guarantees in Member States (DG Call for proposals No. VP/2012/012).

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[1] Council Conclusions 11838/11 of 17 June 2011 on promoting youth employment to achieve the Europe 2020 objectives.

As a response to the rising unemployment rates in the wake of the financial crisis, the Commission also adopted different flagship initiatives , programs or 'packages' consisting of a Commission communication and several staff working documents proposing a series of measures to help Member States tackle unemployment and social exclusion. Central in the context of this paper is the Youth Employment Package (YEP) that the Commission proposed in December 2012, a package including a series of measures to help Member States to tackle youth unemployment and social exclusion specifically. This YEP contained a recommendation to launch a Youth Guarantee in every country. Since the European Council adopted a recommendation on such a youth guarantee in April 2013, Member States must now ensure that all young people up to the age of 25 receive a quality job offer, continued education, an apprenticeship or a traineeship within four months of leaving formal education or becoming unemployed. The Commission monitors the implementation of Youth Guarantees in the European Semester exercise.

A central feature of the YG is the emphasis on the necessity of **cooperation** between a wide range of stakeholders. As is stressed by the European Commission (EC) the "Youth Guarantee entails a structural reform of the way in which the public, private and voluntary sector engage and support young people to complete education and enter the labor market through a coordinated, holistic and individualized approach, which understands and meets the needs of each young person" (EU 2013). Thus, public authorities, private and voluntary organizations spanning several policy areas are asked to coordinate their activities and work to reach commitments to improve the situation for young unemployed. Of course, the configuration of relevant actors differs by country which makes a universal European approach difficult. YET, it could be assumed that this overall inclusive approach mirror the development of the YG at EU level, providing room for influence and involvement of a wide variety of stakeholders. This assumption is further supported by the fact that the YG is a political issue less controversial than others. The interesting question is if this is true for all interest groups or which supply side factors are decisive.

A variety of stakeholders

The data for this study is drawn from a series of interviews with representatives of interest groups and policy-makers at the European level. The intention was to gather a selection of relevant groups covering actors representing demand side and supply side. Demand side is represented by interviews with representatives from the EC and the EP while the supply side is represented by interviews with representatives from the social partners (ETUC), EU agencies (EESC), youth organizations (Youth Forum) and other interest groups (EAPN, Eurocities). This selection does not represent the full range of all relevant actors; the ambition was rather to interview representatives from different types of

actors. The interviews were semi-structured following a guideline that contained "when", "why", and "how" questions (Bacchi, 2009) with respect to policy learning. Thus , when policy learning takes place (at which stages of the policy making process), which actors that are important for the respective interest group, type of information needed/wanted, mechanisms or instruments used, conditions promoting and obstructing policy learning and finally if policy learning with respect to the YG is experienced as different from other policy areas. All issues were related to the YG more specifically but also discussed in general terms. Since the focus of this study is policy making at the EU level, much of attention was directed at the early stages of policy making (e.g. policy formulation) and to a lesser degree at policy implementation/follow up. The interviews have been supplemented by policy documents.

Among the interviewed EU institutions the Commission is probably the most visible and powerful institution. It has competencies in policy-making, implementation and monitoring. The EC has a particular powerful role in the policy making stage since it has the exclusive right to formulate proposals and by that shape the content of EU policies. Before making proposals, the Commission consults widely so that stakeholders' views can be taken into account. In addition, an assessment of the potential economic, social and environmental impact of a given piece of legislation is published along with the proposal itself. The EC however, is not a single voice but an institution that consist of many Directorate Generals (DGs) and units that are responsible for different tasks, have different priorities and different opinions. In the case of the YG, the DG for Employment, Social Affairs and Inclusion is one central DG. Within this DG work is further specialized (e.g. Unit C1 European Employment Strategy and Governance or unit C2 Sectorial Employment challenges, Youth Employment and Entrepreneurship)[2]. The European Parliament's role in the Community's legislative procedure has increased from having, initially, no role to play, to having a consultative role and, ultimately, to having powers that are more than consultative (level of codecision with the Council of Ministers). It is the Parliament's task to make amendments to the proposed legislation and to take decisions; thus needs information that allows it to assess the legislative proposals made by the EC. That implied that the EP has increasingly been the target of lobbying activities (Bouwen 2002)[3].

The European Economic and Social Committee (EESC) is a consultative body of the European Union[4]. The EESC has to be consulted by the Commission or Council in cases such as employment, education, structural funds, safety and health etc. In addition to the mandatory consultation, the Commission,

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[2] The interview was performed with a youth officer at unit C2.
[3] A MEP from the EEP was interviewed.
[4] http://www.eesc.europa.eu/?i=portal.en.the-committee

the Council and the EP can ask the opinion of the EESC whenever they think it is appropriate. The EESC has 353 Members that are drawn from economic and social interest groups in the MS (employers, workers and various interest groups). The work within EESC is divided in six specialized sections where the Section for Employment, Social Affairs and Citizenship (SOC) is the one most relevant with respect to the YG. The EESC's main influence factor is the formation of a sufficient consensus, yet it is often stated the agency only rarely has a direct impact. A reason for that, van Schendelen (2005) explains, are difficulties to reach common positions between the three member groups[5].

The European Youth Forum (YF) that is the platform of youth organizations in Europe. It has approx. 100 members (national youth councils and international youth organizations) and works for an improvement of the situation of youth (to empower, encourage, involve, represent, reach out and support young people). The European Youth Forum also plays an active role in various civil society networks; it is member of the NGO Liaison Committee of the European Economic and Social Committee, the Social Platform, ECAS, and the European Alliance for Volunteering and participates in several other ad hoc networks in the EU. Also EAPN is a large network of national, regional and local networks, involving anti-poverty NGOs and grassroots groups as well as European Organizations and works active in the fight against poverty and social exclusion. It is a founding member of the Social Platform (Platform of European Social NGOs). The European Trade Union Confederation *(*ETUC*)* is working for a Europe with a strong social dimension, which focuses on workers' interests and well-being. It comprises 90 national trade union confederations in 39 countries, plus 10 European trade union federations. Finally, a representative of Eurocities was interviewed. Eurocities is a network of major European cities. Local governments of over 130 of Europe's largest cities and 40 partner cities are part of Eurocies and work within six thematic forums , working groups, projects, activities and events for sharing knowledge and exchanging ideas[6].

Results - Opinions of policy makers and representatives of interest groups

The representatives of each organization were asked about features for policy learning specific to their organization: at what stage of policy making efforts are placed, which EU institution efforts are directed at, what type of information is given/needed and what the most important strategies and tactics are. As well, for each stakeholder the most relevant obstacles for policy learning were discussed. As only one representative of each organization was interviewed the results can just be assessed as opinions or indications; other representatives of the same organizations might have

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[5] A policy officer from SOC was the interview partner.
[6] From all interest groups policy officers were interviewed.

mentioned other strategies or obstacles. This could be true in particular for the Commission and the Parliament that are complex organizations and whose internal structure is highly specialized. However, with regard to the other interviews these opinions can be assessed as highly relevant. These organizations often only have a small number of staff in Brussels and the interviews were performed with spokespersons of the organizations.

In the following part, the results are sorted under headings describing demand and supply side factors. Starting with the demand side (creating policy learning conditions) stakeholders opinions are first presented using the theoretical distinction between closed vs open venues and in a second step describing the variation of stakeholders. The supply side factors (using policy learning conditions) are presented under the headings: establishing reputation, type of group, type of information and type of strategy.

Creating policy learning conditions

Within the EU, a large range of venues exist that offer opportunities for getting insight into the work of the EU and spreading own opinions. These can be more or less inclusive for certain actors and thereby determine access to policy learning venues for interest groups.

Institutional settings for policy learning that happens in closed venues are for example **obligatory consultations** addressing a comparatively selected circle of actors a) on the possible direction of an initiative, and b) on the content of an initiative, in a second stage. Obligatory consultations are sometimes called as the first generation of consultation instruments and aimed mainly at the involvement of economic experts and powerful business actors whose consent was perceived a necessary prerequisite for the efficient implementation of Community policy (Quittkat & Fink 2008:178). When the Commission tables a draft proposal, it is, for example, required to consult the ESSC. As pointed out in the interview with the EESC, this is the point when their work starts. They do not engage in public consultations that the Commission offers before launching a proposal. But once the EC consults the EESC, they work intensely to prepare an opinion. Since the EESC contains of three diverse groups (workers, employers and various interests), they have extensive discussions around each issue. These take place in various sections; with respect to the YG in the Employment, Social Affairs and Citizenships section (SOC) but also study groups within SOC and in the EESC plenary. With respect to obligatory consultation processes, the institutional setting of ETUC is more favorable than in particular for EAPN, or Eurocities. ETUC coordinates trade union involvement in a number of consultative bodies, such as the European Economic and Social Committee and the **social dialogue**. Also the YF is embedded in a special institutional setting, the **structured dialogue** with young people.

This dialogue serves as a forum for joint reflection on the priorities, implementation, and follow-up of European cooperation in the youth field and involves young people and youth organizations at all levels in EU countries. It also provides for dialogues in various settings; at EU Youth Conferences organized by the Member States holding the EU presidency, or the European Youth Week (youth summit). For example, François Hollande met with youth activists and youth organizations in the framework of the "Youth Summit for Quality Jobs" conference in 2013 or Angela Merkel participated at the youth summit in 2014. These kinds of institutional settings for policy learning are exclusive for certain actors and provide the possibility to raise issues and promote opinions.

Peer Reviews within the Mutual Learning Program (MLP) is another rather closed venue. Peer reviews provide a forum for EU government representatives to exchange information and experiences on a topic. The procedure is strictly governed by the EC. Peer Reviews are hosted by a Member State that wishes to present an effective policy or practice to a group of peer countries or a country that plans to implement a reform and invites MS who has experience of similar reforms. The events are also attended by independent academic experts, who contribute with wider knowledge and support, including background papers which are prepared in advance of the meetings. Peer Review comprises a range of presentations and interactive working groups, delivered over two days. According to the interview partner from the EC, Peer Reviews within the frame of the MLP are a very meaningful policy learning institution, discussions are open and constructive (Interview Commission). Yet, not all types of peer review processes are experienced as transparent. Another type of peer review consists of experts that meet with the Commission, experts from the permanent representations of the MS and the secretariat of the council. This is a closed venue; the EESC and also the Parliament have no access to these meetings and do not know what happens there (Interview EESC).

EAPN and Eurocities lack access to these kinds of closed policy learning venues that ETUC has access to; they participate in so called platforms or second generation consultation instruments. These instruments are characterized by the broadening and deepening of societal involvement; e.g. the Platform of European NGO's or the European Platform against Poverty and Social Exclusion that brings together stakeholders working with issues relating to social inclusion. **The European Platform against Poverty and Social Exclusion (EPAP)** is a rather new institutionalized form of consultation that brings together EU-level NGOs and social partners in the fields of employment, social affairs and inclusion, representatives of EU Institutions and other international organizations, representatives of national, regional and local authorities and think-tanks and foundations for issues relating to social inclusion. It has however been criticized that even if the EPAP has promoted and succeeded with

including a broad range of stakeholders, the involvement of new stakeholders with a 'high-profile' (EU agencies, international organizations) have entailed a watering down of the role of the more traditional stakeholders such as EU civil society organizations, and decreased the attention paid to the involvement of people experiencing poverty. In addition, the content of the exchange has been altered, with the European Commission determining the agenda of the meetings and little time devoted to stakeholders' interventions (Sabato and Vanhercke 2014). Also the **PROGRESS program** aims to increase the involvement of several European umbrella NGO networks by supporting them financially (e.g. EAPN, EUROcities). Yet, reduced financing during the last years implied limited resources and leeway of action for these interest groups (Interviews with EAPN, Eurocities).

A rather new strategy to gain attention of the EC and MS is to mobilize the EU Parliament and civil society is increasingly aware of that. "They more and more understand the importance of the political world" (Interview Commission). Various **networks** that Members of the Parliament (MEPs) can create for lifting a policy issue are stressed as important policy learning possibilities (Interview Parliament). Some of these are exclusively for MEP, other involve also external stakeholders. One of these is a network for young MEPs below the age of 40. The group was launched approx. 10 years ago and focuses explicitly on youth policies. The group works closely together with youth associations and young members of the national Parliaments. Another network within the EP, is the EU40 bridging all European Parliament parties. This network does not specifically deal with youth policies; instead the network has a more general focus. The mandate and influence of this network is that they can bring an issue to the attention of the Commission. Within the EP there is also a series of so called **intergroups** that can be formed by members from any political group and any committee, with the intention to create informal exchanges of views on particular subjects and promoting contact between members and civil society. In the last legislative period the youth intergroup was instrumental for the launch of the YG, both in the pre-proposal stage and in the policy formulating stage (Interview European Parliament). The cross-party trade union intergroup is in turn an opportunity for ETUC to work closely with MEP. In general, intergroups provide additional venues for interest groups to engage with MEP and built important coalition.

Hearings, debates, and conferences are other venues that provide possibilities to gain knowledge on EU policy but also to make the own voice heard. Not all of these are however open to everybody, or as mentioned (Interview EAPN) information of conferences or hearings are sometimes only spread to those invited. One of the most open institutional settings inviting everybody to comment on the Commissions' ongoing work is the so-called **open online public consultation**. With that the Commission provides a venue that enables citizens and stakeholders in general to comment on the

work in the Commission. Open consultations are discussed as mirroring a trend towards more openness and transparency or participatory democracy – put into practice through partnership with 'civil society' (third generation of consultation instruments). Yet, as mentioned in several interviews, it seems that the Commission is not so happy with the open consultations because comments are too incoherent, too diverse and just too large in number (Interview Commission, Interview EESC). Thus, in lack of time and resources, institutional settings that provide for more coherent opinions are preferred by the Commission.

To overcome barriers that closed venues imply, informal contacts play a major role and the importance of these is highlighted by all interests groups. All mention that they have good contacts to the Commission and the respective DG; even if not always as much as they would like but they all express the possibility to get in contact with officials in the EC. It is however also mentioned that the EC's openness varied between the DG's; the Commission is not an entity and different DGs (e.g. DG EMPL and DG ECFIN) talk different languages. "Much of social policy is decided by agents that prioritize financial issues" (EAPN). But all agree that access to information depends to a high degree on **personal contacts**. Personal contacts are also common with MEP and in general the EP is experienced as the most transparent EU institution whereas the council as the most closed one (a black box) (Interviews –Youth Forum, EAPN, Eurocities). Personal contacts can to some extent help to overcome the closeness of the Council. The YF for example uses contacts to the social attachés of the MS in order to influence the council. However, even if personal contacts are important and used everywhere, they can't be used too extensive. As one interview partner said, you can't call and ask about information too often, nobody has time for that. Another circumstance that makes personal contacts vulnerable as a source of information is the frequent turnover of staff.

In general, the Commission is interested in participation of a large range of actors and ideas in the early stage of policy formulating but has at the same time the problem of managing the large number of interest groups. In general, participation of stakeholders in the pre-proposal and proposal stage has changed overtime; rules have become more formal with an intention to avoid a bias towards certain stakeholders. One way to balance stakeholder participation and to capture the potential impact of a proposal on several policy areas was the introduction of an open consultation procedure. The interest in these is huge (Interview Commission). Yet, not only interest groups comment on a proposal, also member states and social partners point to specific conditions in their respective countries. Following the formal procedures takes a lot of time and in practice it is not always possible to look at all comments (Interview Commission). That did not happen in the case of the YG either which is also one reason why the YG passed so quickly (almost a record from the first proposal

in December 2012 to the European Councils adoption of a recommendation on the youth guarantee in April 2013). Another reason was a consensus on the issue of youth unemployment.

The importance of national, regional and local stakeholders for policy learning is stressed several times (Interview EU Parliament). "The best solutions for problems are not found by EU policy makers but by stakeholder and associations at the national and subnational level they just need some political help." This includes in particular the national/regional Public Employment Services (PES), business organizations, unions but also youth organizations. On this point, Eurocities agreed and pointed to the importance of the local level for identifying both challenges and possible solutions. They also argue against on-size-fit all approaches, but stress varying local conditions that require greater flexibility in solutions. Also EAPN points to the worth of information from people experiencing poverty, information that EU policy makers do not dispose over.

A risk that all stakeholders and policy makers are aware of is that of a limited input of new perspectives. "You see always the same persons at the conferences, talk to the same people, sit beside the same people" (Interview YF). The YF wonders sometimes how to get new input" and adds that "also the Commission always asks for new ideas. This is confirmed in the interview with the EC: "There is an awareness that we always meet the same stakeholder, we talk to each other but often without really understanding each other, or without really discussing. Dialogues are important but as mentioned before learning happens much more in fora like the peer reviews where a MS present a program and other countries come and really want to understand that". A suggestion from the representative of the Parliament is: "to talk to people outside the EP, outside Brussels, outside politics, and not only at the national but also sub national level. That is actually is the best recipe to challenge own perspectives and to get new perspectives, new ideas, new knowledge. There is a risk of remaining in a golden cage and just getting one-sided information when you only talk to politicians. When you are younger you are a bit more open minded and maybe even more important when you are in the beginning of your career or new in Brussels. Over time people might develop habits, have made good experiences with certain associations and will just return to these for information and feedback and so on".

Summarizing demand side factors, we can conclude that the institutional setting and changes thereof determine access to policy learning for interest groups. Some of the changes are the creation of new fora intending to improve the policy learning infrastructure but in reality can have the opposite effect. Mentioned effects are limited influence of participating groups, reduced financing of interest groups or excluded actors from information.

Using policy learning conditions

In this part the focus is on the interest groups and their position in the policy learning process, delivering a wanted good in form of knowledge and experience. Aspects as the groups' reputation, type of group, type of information and used tactics are described.

The view on how important a reputation as an expert organization is varies between the interviewed stakeholders. All agree that one has to argue for your ideas and proof that these are important, but other forces exist as well that decide about the groups place in the policy learning game. At the Youth Forum, they are aware of that their expertise is not the most needed good they dispose over but that they give legitimacy to the Commissions' policies. "The Commission needs the YF, because we represent a lot of youth and that is politically important for the Commission. It is more about the reputation of the EC; to show that they (or the EU in general) actually listen to young people". The YF as all interest groups work with hard evidence, write reports and use statistics to deliver valuable expertise but "there is so much expertise in Brussel, if you want to have that there is a lot, so the EP and the Commission are not depending on us for that, it is much more important for them to show that they are interested in young people, that they are people working for people" (Interview YF). Also for ETUC it is not so much about reputation, or proving that they are a relevant organization, it is more about the perceived need to (re)strengthening the position of the unions. In contrast, in the interview with Eurocities the importance of reputation was stressed. "It is a constant work from the side of Eurocities to prove our importance (come up with findings, best practice, examples and trends). If we are able to provide that (solutions and trends), then they listen to us; if not we are out of the game".

Youth Forum, EAPN, Eurocities and ETUC are all platform organizations representing a broad variety of member organizations. So in some way all four groups belong to the category of "diffused" groups (Pollack, 1997) (as opposed to concentrated groups). Yet, despite this similarity they experience different policy learning conditions. These might be related to the type of information they provide but also to the fact that they represent new or not traditional groups. Eurocities for example, as a rather new stakeholder, explains that it has not been easy to get involved into policy learning, because traditionally the EC interacts with the social partners and national governments or regions. "It has been a long process to make all these agencies understand the importance of cities and local governments". Also EAPN mentions that the perception of which group is an expert in what issue can be narrow, excluding not only groups but also opinions. Governments for examples listen to the

social partners with respect to labor market issues, but not to EAPN when they want to talk about e.g. working poor - they bang on closed doors (Interview EAPN).

All four interest groups try to engage in the whole policy making cycle by spreading their knowledge and experiences, but of course work in different ways in the various stages. They also all apply **several strategies** that give access to a variety of venues; they get in contact with EU institutions, EU agencies, other EU stakeholders and cooperate with their partners at the national level (national youth councils, national EAPN members, national trade unions, cities) that work with their respective governments. All stress that **partnerships, alliances and pooling resources** are extremely important tactics. The decisive role of **good personal contacts** was already mentioned earlier. Good contacts can make it possible to receive e.g. a draft written by a rapporteur from the EP employment committee early what makes it possible to react in time and to prepare amendments. The closer the amendments are to the draft, the bigger are the chances that they will be taken into consideration. Personal contacts are important everywhere in policy learning; in formal and informal ways. Contacts can be used to assess how negotiations are going, what arguments are used and for deciding how the own organization should react in the best way or sometimes not to intervene so that a process goes through as quick as possible. Stakeholders with less formal access opportunities (to closed venues) have to **find backdoors to opportunities they are not always invited to**. Policy learning conditions are for some interest groups more restricted than for others and they have to take all possibilities they can get to "be there", to ask a question from the floor as a way to raise an issue and sometimes even to be annoying (Interview EAPN). If the events are public access is not a problem, but not everybody is always informed that something happens. "As an NGO, you crash these events knowing that you are not invited and even wanted, and ask a question relying on the fact that the moderator doesn't know who you are and you ask an uncomfortable question which the panel will ignore completely and not answer. It is not always like that but often. But it does not matter because people around you heard you. To ask the question is the most important thing, maybe someone comes in the break and wants to hear more. You have to find back doors to come in, making noise" (Interview EAPN). Writing alternative country specific recommendations is another strategy EAPN follows which are send to the Commission and as well an annual assessment on the national reform programs.

Stakeholders also have to adapt **new strategies when circumstances change**. With the increasing importance of the EP, interest groups for example use contacts to MEPs more often to raise awareness in a certain issue (Interview Commission). Fewer resources can imply a change or adaption of strategies (experience by Eurocities, EAPN and Youth Forum). But also alterations in EU policies can result in a reassessment of working methods. With the decision of the new Commission

under Junker to limit legislative activities, implying for the EESC that they will have to formulate fewer opinions in the future, they have to find a new profile and to define new tasks. Evaluations of the implementation of policies are one way (Interview EESC).

For ETUC the most important way to be heart is by **reaching agreements with the employers' organizations** at the European level (e.g. the Framework of Action). Thus, the central strategy is the European social dialogue. In the Frameworks of Action the European social partners identify certain policy priorities that serve as benchmarks for the national levels. The social partners report annually on the action taken to follow up these texts. Yet, ETUC is concerned about the watering down of the Framework of Action and in general weakening outcomes of the European social dialogue. Agreements no longer results in concrete action and objectives agreed by the social partners associated with certain obligations and duties (Interview ETUC). Instead of binding laws, the Framework of Action is now a recommendation and the implementation of the framework differs a lot between countries with e.g. strong industrial relations and those with weaker ones.

The necessity to work **proactively** is explicitly mentioned by EAPN and EESC. Since the EAPN does not have the same access to policy learning venues as e.g. the social partners, they have to write opinions on an issue (like YG) without knowing the Commissions plans and hope to make some influence (shoot in the dark). The same is true for the council. Without knowing how the discussions look like in the council, they write letters to the council and at the same time formulate template letters for the national members that can translate them and send them to their governments. But also EESC has a strategy to work proactive. Using the work program of the Commission they can prepare public hearings or discussion on future topics and titles of initiatives– as ways to contribute to policy learning.

Most stakeholders work with a bottom-up and top-down approach simultaneously. Trends, experiences, challenges and solutions from the local/regional/national level are transferred to the EU level and ideas from EU agencies and institutions back to the domestic level, thus applying a **bottom-up and top-down approach** at the same time. Eurocities main strategy is dissemination of good practices from the local level by organizing study visits inviting other cities, professionals and the Commission, applying the approach of **mutual learning**, writing reports and disseminating messages about what works to the EU level.

Finally, a problem with the policy learning infrastructure mentioned in all interviews is the lack of information from the local/regional/national level. In particular, Eurocities sees a need to fill that

gap. "Ministers and the governments don't know what happens at the local level", a statement that is confirmed by the interview with the Commission and the Parliament. An interesting comment was made in the interview with the Parliament who mentioned that official working in Brussels often are tempted to look for information in their own country but instead should search for information from other countries. Countries and their institutional regulations differ a lot and the EU needs much more knowledge and expertise from the national/local and regional level. Also EAPN objects the lack of competencies on EU level about peoples living circumstances.

Summarizing, all groups apply different strategies simultaneously. Building up reputation as an expert for reliable information is in the literature named as one of the most important strategies. That is also confirmed in the interviews here, but at the same time the picture is broadened and as mentioned above, efforts for influence are in many cases strategies to handle institutional constraints.

What is then the importance of the YG as a policy area? Most actors give a picture of the YG as a policy area that to large degree is characterized by consensus. However, that does not mean that all actors agree on proposed measures, instead ideas about solutions differ. Some actors put higher accent on fiscal consolidation, flexibilisation and deregulation of labor markets whereas other stress investment, education, the precarious situation of youth on the labor market or youth poverty in general. As is emphasized by ETUC, "it is too limited to deal with unemployment by focusing only on the supply-side and labor market policies which are based on the overly straightforward assumption that unemployment can be tackled mainly by targeting job search, improving skills, and strengthening motivation. The issue of unemployment, particularly among young people, cannot be thought of as a mere behavioral and (ir)rational choice problem of the supply-side (ETUC 2014:5). The YF highlights quality assurance, meaning that the YG must not create poor quality jobs and poor quality training for youth as this will merely perpetuate the issue of precarious work which young people since the crisis have been increasingly forced to undertake. Eurocities point to the fact that youth unemployment was on the cities agenda long before the EU took an initiative in that respect and they stress the perspective of the cities. EAPN sees an urgent need to broaden the discussion about youth unemployment and work by including the issue of youth poverty, participation of youth in society, access to services (e.g. in particular access to housing) or the risk with low paid jobs for entering the labor market. They criticize that the discussion on EU level is too narrow and that youth unemployment should be seen in a bigger picture. In addition, policy tools used so far are not enough and for example quality criteria for good jobs are missing as well as common evaluation criteria. EPANs comments meet in large degree issues discussed by the Youth Forum. Also they complain

about a limited perspective on youth policy; "youth policy is not only the YG". Opinion differ thus on how to deal with youth unemployment. Access to policy learning opportunities are thus an important tool in policy making and can contribute to exclude or include certain opinions.

What do then policy learning conditions look like for various groups or how do demand and supply-side factors interact?

This paper intended to lay out EC powers in setting the rules for various interest groups possibilities to participate in policy learning exemplified with the YG. As expected both supply- side and demand-side forces are at play and several patterns can be distinguished.

Related to demand-side factors, one is the institutional structure of the policy learning venues. A first distinction is the one between formal and informal venues. Formal settings can cover everything from permanent to more ad-hoc relations whereas informal contacts are more of ad-hoc character. Formal permanent consultation opportunities are for example the social and structured dialogue and more recently the EPAP – all fora that bring together a variety of stakeholders often with different belief systems and the aim to develop debates, understandings and joint policies in certain areas. Networks or intergroups within the EP that last for the legislation period but not necessarily longer are rather quasi permanent formal consultation opportunities. Membership within these groups is depended on a joint interest in an issue or policy field. Also peer reviews can qualify as quasi permanent formal consultation opportunities since they take place irregular, depending on a request of a country or city. All interest groups are involved in formal ad-hoc venues like hearings, debates, and conferences and also open consultation processes belong to this category. Informal ad-hoc contacts are an important part of EU policy making and personal contacts with officials at the Commission, within the Parliament or with all kinds of agencies and organizations are a common element in interest groups activities. In addition, peer reviews are an exception of the pattern that stakeholders continue to meet same people.

Another pattern related to demand-side factors is that thick and thin institutions do not necessarily correspond with the distinction between formal and informal settings. If we define thick institutions as those were the important actors meet and the decisive decisions are taken, these are not automatically the formal permanent venues. The social dialogue is a good example for that where the experience of ETUC is that the outcomes of the social dialogue have become weaker (no directives but recommendations) and are of less importance for EU policy making (more a formality but no real influence). ETUC assess that the instrument of the Framework of Action has nowadays less power and that the interest in following the agreement from the employers' side is considerable

lower. Another example is the changing environment of the EESC who has to adapt to these and define new tasks to keep its role in policy making. Several interview partners instead mention the more quasi permanent formal consultation opportunities in form of networks or the EP intergroups as important for policy learning. The MEPs involved in intergroups are found to be interested and engaged and open access to their respective national governments. This picture is also confirmed by the representative of the EC who clearly sees that interest groups have learned to see the role of the Parliament and to use it. From the perspective of the Commission, peer reviews are the most important and effective venues to learn from each other and influence other MS policies even if the heads of the governments are not eager to say that aloud. Similar to intergroups and networks, it is rather the genuine interest in the people gathering that gives room for listening, learning, and influencing policies.

Coming to supply side- factors, some stakeholders are in a peripheral position compared to others. The position of insiders and outsiders might of course change with respect to the topic. The Youth Forum seems to be an insider when it comes to the YG. Interestingly, however, the representative of YF is not only happy about that but can see a risk of being used by the Commission and eventually losing legitimacy among their own members. The insider position of YF is not because to the unique expertise of the YF in youth issues but because of the type of group and its members that is an important resource for the Commission. They do however not experience that their message (a broader discussion about young people's situation at the labor market) gain a hearing by the EC. EAPN on the other side, experiences themselves as an outsider but not only with respect to the YG, rather in general in a political climate that does not reward engagement for the situation of the most vulnerable. They "bang on closed doors" and have to fight for access to policy learning venues. Also ETUC complains about a tougher climate and uses the expression of a bypassing of the social partners at EU level that disfavors the unions. They mention that the Commission considered the trade unions should be part of the YG but since the YG is implemented at the national/regional level they just jump the European actors, like the ETUC. Eurocities in turn, tries to move from an outsider position closer to the inner cycle of policy making but cuts in funding limits their range of activities. However, also for EU agencies belonging to the inner cycle of EU policy learning conditions can change and the agency has to be aware of that to keep their position (EESC).

Stakeholders that rather can be defined as outsiders like Eurocities and EAPN have more difficulties to get their voice heard than more traditional stakeholders (ETUC). Both mention that they have to struggle for being accepted as experts. This should also be the case for YF but in the case of the YG they have a strategic role and thus move to the inner cycle of policy making. However, it is also about

the messages or the input that certain stakeholders want to give that can be ignored, reduced or stressed by institutional procedures. The YF is a key player in the structured dialogue and is invited to the youth summit by each presidency giving them a possibility to raise awareness for the situation of young people. Yet, the message the Commission is interested is only about increasing labor market participation of youth by the YG reducing the role of the YF to an expert on that and ignoring other issues important for youth. The same picture is drawn by EAPN experiencing that their message about poor youth and youth problems of getting access to all kind of services (not only labor market) is not the focus of the Commissions' politics and thus ignored.

Finally, policy learning infrastructure at EU level shows for a tension between the general interest and need of the Commission to increase input of a variety of stakeholders and how to handle these. All actors (including the Commission) experience a situation where policy making takes place and is influenced by the same group of people and actors. All groups express a frustration over meeting the same people everywhere and point to the lack of real new input. This tension corresponds also to the emphasis that several interview partners put on the involvement of national and sub-national stakeholders as the real experts on the one hand and the difficulties of these to get attention at EU level on the other hand (see Eurocities). A large turnover of staff does also imply in practice that the same people just switch jobs between EU interest groups and EU organizations. Another tension on the other hand addresses a serious concern of the Commission. The need of non-biased information of a broad range of actors to avoid criticism for subsequent policy failures but also to address the so-called democratic deficit and the presumed distrust in the EU; yet, at the same time procedures are needed to manage the input of the increasing number stakeholders that want to get influence. These procedures however, imply in reality a reduction of lobbying activities and delivered information for certain actors. The EPAP is a good example for that. A larger number of stakeholders participate in the platform but the actual importance of interest groups was reduced. Procedures can reduce or lift the role of actors (like the YF).

Studying policy learning infrastructure, and in particular demand–side factors directs much needed attention at tools and processes of policy learning. It reveals that there is an obvious risk that the claim of the EU to actively promote and cultivate participation of EU groups of all kind is being transferred in pure 'window dressing' with no interest in taking these groups opinions into consideration.

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