

FOOD RETAILING IN EUROPE - POST 1992

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TALKING TO GOVERNMENTS

A study prepared for

**THE COCA-COLA RETAILING RESEARCH GROUP
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by

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EXECUTIVE SUMMARY

This report examines the structure and influence of the retail lobby in the European Community. To bring the review down to manageable size, it focuses mainly on interaction with the Community institutions. The main points to emerge from the study are that:

- * The environment for dialogue with government is currently under pressure in the Community to change and adapt to more formalized, but open, consultative procedures.
- * Considerable restructuring is occurring within the Commission and it is not clear, at the present time, whether retail interests will be reallocated inside the Commission.
- * Organizations involved in lobbying activities at the EC level will come under increasing pressure not only to focus their EC activities, but also to establish good interaction between national organisations and EC institutions. It is clear that the interaction of national organizations with EC organizations determines the nature and influence of the retail lobby.
- * The current diversity of the retail trade representation clearly reflects the diversity of interests in the sector (retail, wholesale and distribution) and the concentration of corporate interests within those areas.
- * The conclusion has to be that a more focused retail lobby is necessary, with well integrated links to national federations and an active, direct participation of company representatives at both national and EC levels.
- * Representation of corporate interests through an association will be increasingly necessary as the pressures for regular and formalized consultation increase.
- * Activity is already underway to group the resources of the retail lobby under an umbrella organization. These should be encouraged if the retail lobby is to improve its effectiveness in influencing all parts of the EC policy process and its standing with the European Commission.

CONTENTS

	Page
Executive Summary	1
1 Introduction: The task of talking to governments	3
2 The institutional focus	4
3 How to talk to governments	7
4 The retail trade lobby	11
a The evolution of Commission retail trade representation and its lobby	11
b Main actors at the EC level	12
c The national retail lobby	13
d Identified problem areas	14
5 Overview of major non-retail trade organizations by sector	21
a Food industry sector	21
b Chemical industry sector	22
c Industry interests	23
d Agricultural sector	23
6 The changing environment for lobbying in Brussels	24
a Community activities	24
b Retail trade representation	25
7 Conclusions	27
 Appendices:	
A Issues relevant to the retail trade	29
B Main EC retail trade organizations	30
C Bibliography	44

1 INTRODUCTION: THE TASK OF TALKING TO GOVERNMENTS

There is no simple and ideal type solution to the problem of how to talk to government. This paper outlines the reasons why trade representatives and government need to have an on-going dialogue and considers what form this dialogue should take.

It is clear that there are various levels at which a company can lobby in the Community (for example, at national or at EC levels and within each, at direct or indirect levels). The options will vary according to the issue, the actors, the recipients and the goal to be achieved. The move towards concentration in the retail trade and the creation of retail alliances will put further pressure for more horizontal (i.e. cross-sectoral) issues to be addressed by the retail trade. These issues will have to be addressed increasingly at the EC level to affect policy-making and at the Member State level to affect decision-making in the Community. It will become much harder for the government of a Member State and for regional authorities to avoid implementing EC legislation and to erect barriers to trade. The task of the retail sector will be to ensure with the Commission the completion, the operation and the safeguarding of the Single Market. This will be a joint task for both business and government which will require a continuing dialogue and good organization at all levels.

New challenges to this dialogue have already emerged. The Community has expanded its external agenda to embrace closer trade relations with Central and Eastern Europe. Secondly, there is the creation of an European Economic Area (EEA). Thirdly, the possibility of a multilateral trade agreement in the GATT Uruguay Round negotiations has still to be resolved. All of these agreements will need to be fleshed out by further dialogue with business interests.

In its internal agenda, the Community is completing the current Single Market program and the Commission is enforcing the implementation of the internal market directives where Member States have not carried out their transposition into national law. New policy initiatives in the area of the environment, social policy, consumer affairs and economic and monetary union will also require more attention. The retail trade will have to respond to these and other initiatives which will determine the new business environment in which it will work.

In the words of a recent report from the Roundtable of European Industrialists (ERT) on Reshaping Europe "Business must be strong and well-organised. It is the responsibility of business to compete in the world and create the wealth and the jobs on which Europe's prosperity depends". The ERT qualifies further the role of government by saying that "Europe's economic and political institutions must also be strong and well-organised. Business can only do its job effectively within such a stable framework". This message is especially important in the light of current Commission and Parliamentary activities on the registration of lobbyists and the possible future control of access to information.

2 THE INSTITUTIONAL FOCUS

Since 1958, policy-making and legislative power within the Community has progressively moved from the EC Member States to Brussels. This trend was further confirmed by the signing in February 1992 in Maastricht of the Treaty on Political, Economic and Monetary Union. Policy-making and decision-making are in the hands of the EC Commission and the Council of Ministers. The European Parliament is developing a greater role in this process since the Single European Act and the Treaty on Political Union. Community institutions have attracted the attention of lobbyists, consultants, lawyers, trade association officials, and union representatives, consumers and business representatives during the policy process in proposing, deciding and executing Community policy.

The Treaty on European Union agreed in Maastricht 1992, subject to its ratification, will further strengthen the role of Community institutions in governing the EC. The extent of Community powers vis a vis Member States has been clarified in Article 3b on subsidiarity which states "... in areas which do not fall within its exclusive competence, the Community shall take action, in accordance with the principle of subsidiarity, only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States and can therefore, by reason of the scale or the effects of the proposed action, be better achieved by the Community ...". There are plans within the member states, particularly in the UK, to clarify this principle even further and the high level group set up under the chairmanship of the previous Commissioner Sutherland to examine institutional functioning and structure after 1992 is paying particular attention to this topic.

THE EC INSTITUTIONS:

- a **The European Commission** is the policy initiator in those areas where it is necessary for legislation to be made at the EC level and continues its work as guardian of the Treaty. The Commission has, under the Single European Act, gained extra powers and under the Treaty of European Union these will be extended in the areas of the environment, social policy, defence, security and economic and monetary union. The Commission, given the Single Market programme, has become the principal focus for those wishing to influence policy making.

The European Commission is divided into Directorates-General (DGs) which formulate draft proposals for secondary legislation in a particular area of activity of the Treaty of Rome. These proposals for legislation are adopted in college by the Commission itself which, after enactment by the Council, oversees their implementation and execution. Each DG is split into divisions which deal with sectors of a policy area.

Apart from the specific focus on DG XXIII (Commerce, Small and Medium Sized Enterprises) trade interests are principally concerned with the following DGs:

- DG I (External Affairs);
- DG III (Internal Market and Industrial Affairs);
- DG IV (Competition);
- DG VI (Agriculture);
- DG VII (Transport);
- DG XII (Research & Development);
- DG XIII (Telecommunications);
- DG XXI (Customs and Tax issues, Consumer Policy Service).

Increasingly retailers have been finding that their interests are dealt with by a number of the DGs listed above and it is difficult for them to obtain a focal point in the Community institutions, apart from DG XXIII. This issue has been addressed by the Commission, notably in its Communication on Commerce, and some reorganization has occurred, including the setting up of an advisory committee to act as a watchdog ensuring that food law aspects are handled adequately from the commerce point of view.

The Commission consults industry, commerce, consumer and other interests either formally, to varying degrees but in a regular manner, through advisory committees or on an ad hoc basis through hearings and/or by publishing consultative documents (often called green papers or discussion document). In some technical areas, industry is invited, though trade federations, to send experts to work with the national government experts who are assisting the Commission to prepare drafts. In these cases it is essential that the federation is fully representative of an industry sector and that inter-company rivalries are not played out within working groups.

* **Commission Advisory Committees**

Advisory committees were set up by the Commission in order to further the goals of the Communities, to promote throughout the Community a harmonious development of economic activities, a continuous and balanced expansion, an increase in stability, an accelerated raising of the standard of living and closer relations between the states belonging to it. The Commission itself underlines that the best way to achieve this is through "...the establishment of close and permanent links with trade interests...". Approximately 65 advisory committees have been set up by the Commission, the majority dealing with agricultural issues by agricultural commodity sector.

* **The Consultative Committee on Commerce and Distribution (CCD)**

In response to pressure from trade interests the Commission has set up the Committee on Commerce and Distribution (CCD) for the retail trade. The CCD was originally established in 1978 for an experimental period of three years. Its continued existence was confirmed in the Commission decision of 20 May 1981 and justified by the statement that "...since its inception in 1978....the CCD has produced beneficial results for the Commission's departments...". (OJ L 165/24)

According to the Commission the purpose of the CCD is "...to provide the Commission, at its request, with opinions on all matters relating to commerce and distribution in the Community and on the repercussions which the Commission's activities in other sectors have on commerce...".

The CCD has 42 members taken from representatives of European and national trade organizations and other prominent persons with special knowledge of commerce and distribution who are heads or managers of undertakings. Observers from UNICE (Union of European Employers Federations) and the permanent Conference of Chambers of Commerce and Industry also attend as well as relevant experts.

The Commission is obliged to develop its initiatives through negotiation with representatives of Member States in the Council of Ministers and Council working groups which have in most instances the ultimate decision making power (unless the Commission is mandated by the Council otherwise). The Commission is obliged to consult with the European Parliament and ECOSOC (see section d below), but is not obliged to take their views into account.

- b **The Council of Ministers** is the ultimate legislative body of the Community, although once a legislative framework is established it may delegate powers for detailed legislation to the Commission according to Article 155 of the EEC Treaty. Negotiations between Member States on EC legislation take place in working group meetings of national officials, COREPER, the Committee of Permanent Representatives (National ambassadors to the EC), or meetings at ministerial level. The Council working groups are attended and monitored by officials from the Permanent Representatives and at this stage of the process it is the Permanent Representatives who become the focus of lobbyists and pressure groups in Brussels.
- c **The European Parliament** reviews policy from the EC Commission and proposes amendments on behalf of the Community's general electorate. Since the enhancement of its powers under the Single European Act and the changes to occur under the Treaty on European Union, it has become an important source of information and a rallying point for lobbying campaigns (notable examples are the campaigns on tobacco advertising and data protection).

Parliamentary reviews are carried out by committees, which follow cross-sectoral EC policy areas. Issues are discussed in the committees on the basis of a report prepared by a draughtsman (called rapporteur) who is selected by the committee to monitor the issue. The rapporteur has much more influence on the opinion and amendments proposed by the Parliament than does a draughtsman in a national parliament. The report and proposed amendments, once voted in committee, are carried through for a final vote in the monthly plenary meeting where the rapporteur puts forward the conclusions of the committee for approval and more amendments can be proposed. The Commission has to take a position on the amendments and a report can be sent back to the committee for further discussion; in the extreme case the draft legislation can be rejected by Parliament when it then has to be adopted by unanimity in the Council. (e.g. the proposal for a directive on sweeteners in foodstuffs in 1992.)

The retail trade is most concerned with the parliamentary committees on Economic and Monetary Affairs and Industrial Policy (economic, monetary and industrial policy, tax, company law), on Legal Affairs (Financial Services, Competition and Liability issues), and on Environment and Consumer Affairs, Agriculture, and Transport.

The European Parliament is open to close consultation with industry and other interests when necessary (sometimes by questionnaire) and holds public or closed hearings. Its committee proceedings are open to observers but it can vote to hold a closed meeting (as the Legal Affairs committee has, for example, done). Often parliamentary rapporteurs on a particular piece of EC legislation will canvass relevant organizations (often business) for their views. The choice of rapporteur and the relationship with him or her is vital to concerned interest groups, as is the position of the political party groups which determines the voting in the Plenary.

- d **The Economic and Social Committee** is an additional tripartite review body for EC legislation and has representatives from industry, unions and other economic and social groups. ECOSOC is divided into directorates and divisions, which manage the committees. Issues are discussed in the committees before adoption of an opinion in the monthly plenary sessions. It is not a prime focus for lobbyists but can be an extremely useful indicator of views on an issue, especially since the ECOSOC's opinion often appears prior to that of the Parliament.

- e **The Permanent Representations (or Perm Reps)** are the offices of the Member State civil service in Brussels. They are the official conduit for communications between the Commission and Member States and coordinate the representation of Member States in the Council. The Perm Reps usually have a limited number of specialist advisors, but call largely on their various civil service departments to staff Commission and Council working groups. They are thus important actors influencing both national and Community decision-making. Since the signing of the EEA agreement on 2 May 1992, the Permanent Representatives or Heads of Mission of the seven EFTA countries (Austria, Finland, Iceland, Liechtenstein, Norway, Sweden and Switzerland) will be able to feed into most of the EC policy process, except agriculture, certain areas of taxation and transport.

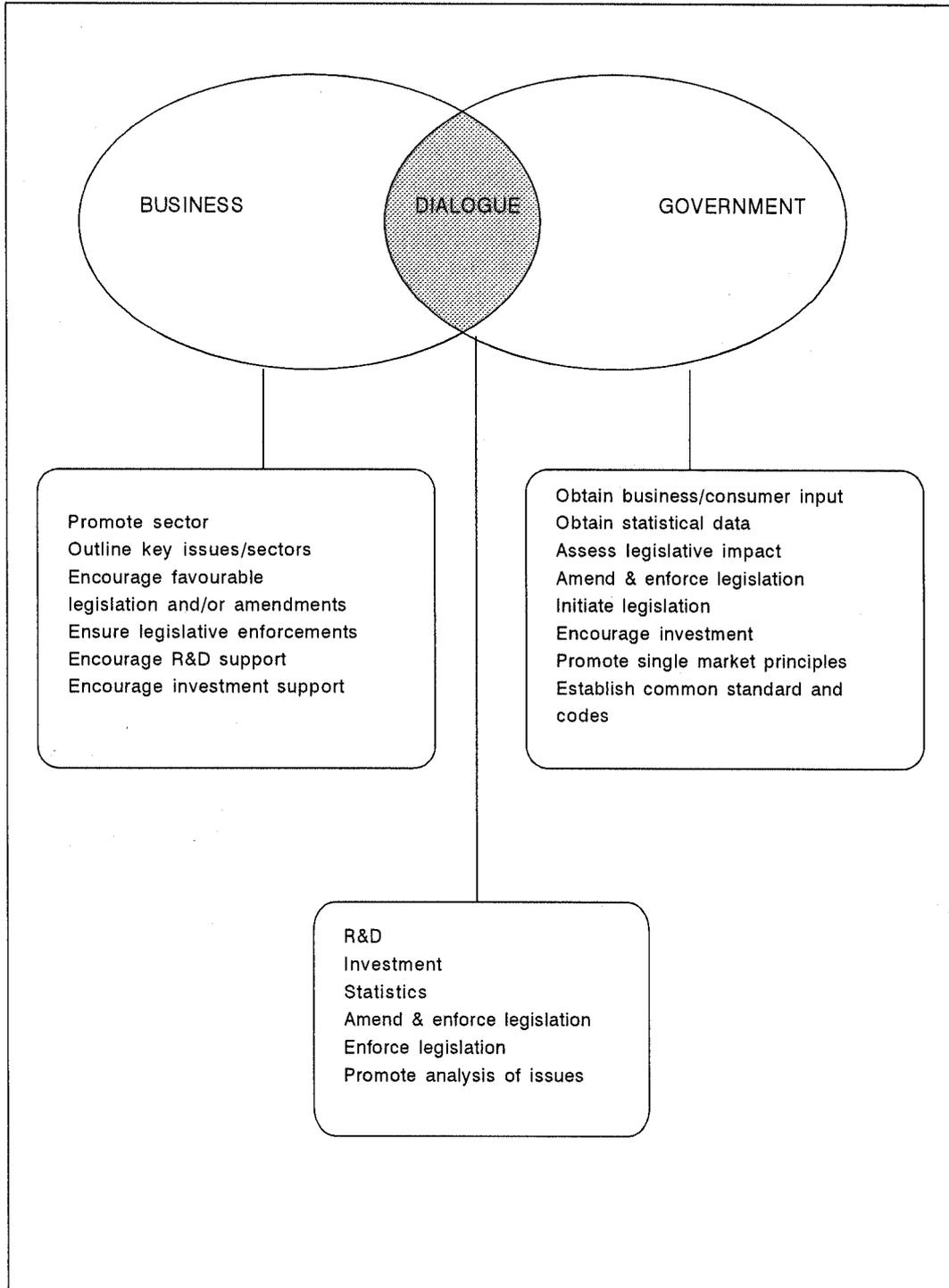
The Perm Reps are becoming increasingly important for lobbyists, particularly when a Perm Rep's country assumes the presidency or the forthcoming presidency of the Council.

3 HOW TO TALK TO GOVERNMENTS

The need to talk to government

There are two interrelated reasons why business should talk to government. Firstly, business needs to make its presence known; secondly because government needs to hear and understand business views. A recognition of the latter can be found in the unratified Maastricht Treaty declaration on estimated costs under Commission proposals. The declaration states "...the Commission undertakes by basing itself where appropriate on any consultations it considers necessary and by strengthening its system for evaluating Community legislation, to take into account in its legislative proposals of costs and benefits to the Member States' public authorities and all the parties concerned...". Diagram 1 on the following page summarizes the main reasons for maintaining the business/government dialogue.

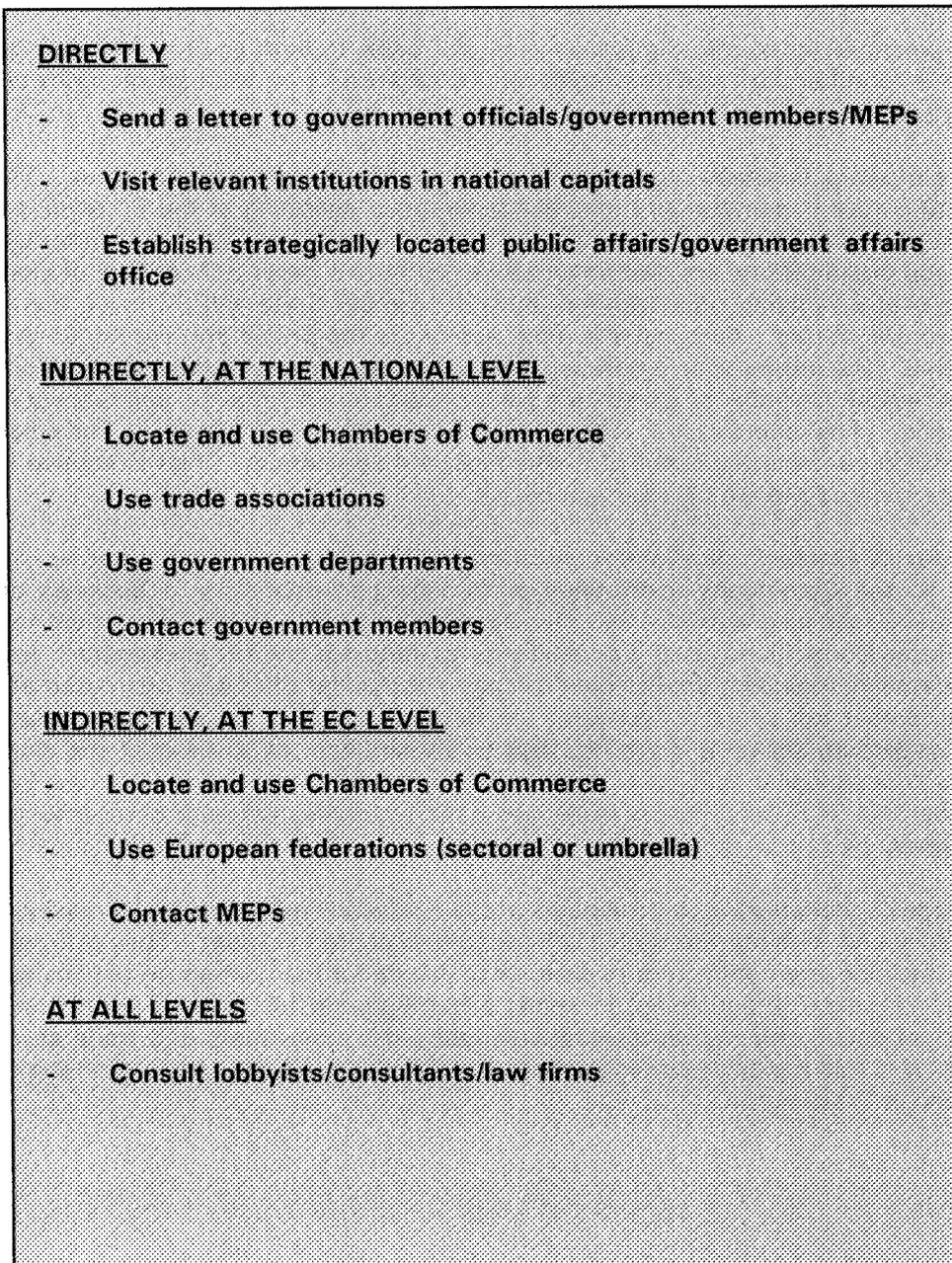
DIAGRAM 1: THE NEED FOR BUSINESS/GOVERNMENT DIALOGUE



The ways to talk to governments

There are several ways to influence Member State governments and Community institutions, and these are summarized in the diagram 2 on 'How to talk to Governments'. These methods are used in varying combinations by companies and trade associations according to the resources available and the complexity of the issue to be dealt with. Issues such as data protection and comparative advertising have involved companies in lobbying at all stages in the legislative process and through different organizations, consultancies or law firms.

DIAGRAM 2: How to talk to governments



Often companies wishing to influence the EC legislative process have opened Public Affairs/Government Affairs offices in Brussels linked to their main corporate government affairs department. This decision not only reflects the need for more company and issue specific lobbying but also the need to participate more actively in the numerous sectoral and umbrella business organizations. There are currently over 200 companies which have set up offices in Brussels specifically to deal with public affairs and EC matters. Over the last ten years many of the one man public or governmental affairs office in Brussels have been expanded to include two or three specialists usually in trade, legal affairs, environment or consumer affairs. A large number of American companies have established Public Affairs offices in the last three years or have set up arrangements with local law firms or consultancies. Often the corporate structure of American and Japanese companies has given them an advantage in EC affairs over European companies, in that they have a designated vice-president for EC affairs.

Many companies input information on a regular basis to both government members and MEPs and together with relevant organizations take MEPs on tours of factories or set up briefing sessions.

In terms of using business organizations to lobby, the choices are numerous. There are over 800 European sectoral and umbrella federations operating at the EC level, of which there are at least 53 organizations representing trade, retail and distribution interests. The main trade organizations are described further on in this paper. Chambers of Commerce are also useful lobbying organizations, both at Member State and EC level, due to their cross-sectoral nature. Amongst the most active are the British and French Chambers of Commerce. The interests of American subsidiaries are represented by the EC Committee of the American Chamber of Commerce which wields much influence and respect from EC institutions. The International Chamber of Commerce (ICC) based in Paris has been successful in coordinating public statements signed by company Chief Executive Officers on issues such as the GATT negotiations.

At both levels a lobbyist, lawyer or consultant will be used to represent corporate interests directly to the Community institutions or through participation in a business or other organization. As long ago as 1981, for example, the UK's Retail Consortium (now the British Retail Consortium) used a consultancy to influence the UK parliament's debate on the EC directive regarding door to door selling. A consultant has also been used at the EC level for almost ten years to represent the Retail Consortium on particular issues. The Retail Consortium set up a Brussels office two years ago, as a result of the increase in relevant issues debated at EC level (both in the Community institutions and in the European retail federation (CECD)), thereby leading to a more complex network of representation at the EC level.

Staff of the EC Commission and members of the European Parliament are increasingly short of time to spend with representatives of companies or organizations. They also have little time to read documentation sent to them or to decide for themselves on the key points of an issue. Brussels is becoming, in short, a battleground for 'airtime' with Community officials between company representatives, lobbyists, consultants and trade association officials. It is also rapidly becoming a place for more professional lobbying on the scale of that found in Washington.

Once access is obtained to officials any dialogue must be concise, to the point, knowledgeable about EC policy-making and well-briefed with business examples of which the official may not be aware. The approach should be constructive with a view to helping officials with the task they have in hand in order to continue and develop access. Documentation or letters which are sent or given to officials should, for example, ideally be no longer than three pages and always have an executive summary.

4 THE RETAIL TRADE LOBBY

a The evolution of commission retail trade representation and its lobby:

Commercial interests have been organized at the EC level ever since the creation of the Community in 1958. Principal milestones in Community policy which the retail trade wished to influence were the Common Agricultural Policy (CAP) established in 1958 and the White Paper on the Completion of a Single Market launched in 1985. The Community's external policy, particularly in relation to each GATT Round of negotiations on agriculture, market access and textiles, have also been of prime importance for organized commercial interests, especially in the last ten years.

A number of small EC trade organizations were established to influence mainly sectoral issues. Up to 1989 the Commission did not have a Commissioner or a Directorate-General with the specific responsibility for trading interests which thus lacked focus with regard to Community institutions. Before 1989 retail trade interests were being handled by DG III, which was also responsible for sectoral industrial interests and the Single Market programme. The retail lobby was faced with a difficult task which was further compounded by the fact that the Commission spoke principally to cross-sectoral European organizations rather than to sectoral or national bodies. An umbrella European trade organization called the Committee of Commercial Organisations of the EC (COCCEE) was set up to coordinate both horizontal and vertical retail trade views. Due to resources limitations and the impossibility of reconciling the divergent interests of retailers, wholesalers and distributors, this organization quickly became difficult to manage.

The 1980's saw the atomization of the EC trade lobby, although this did not happen at the national level over the same period. Particularly in the North European states national organizations concentrated and focused their activities. By the mid 1980s COCCEE had been replaced by the CECD (coordinating horizontal retail interests), FIGED (representing department stores) and GEMAS (representing the interests of large food retailers). National retail associations realized, following the release of the Single Market program, the importance of obtaining rapid information on Community activities and of exerting influence in Brussels: this eventually led to several of them setting up offices in Brussels.

The Commission came under pressure for it to deal specifically with retail interests and this in 1989 resulted in the identification of a specific Commissioner and creation within DG XXIII of a unit with responsibility for retail trade, together with a consultative committee on retail interests. Currently the future of DG XXIII is under review.

b Main actors at EC level

Commercial interests in the Community are represented by several international organizations. The 1992 Longmans Directory of Pressure Groups in the European Community lists over 53 organizations related to trade issues. A brief description of the key organizations by relative order of importance is given below. For fuller details on each of the main organizations please see Appendix B.

General horizontal retail interests are represented by, among others, the following organisations:

* **The European Federation of Retail Traders (CECD)**

The CECD is rapidly emerging as the focal point for representing commercial interests with the Community. It shares a common secretariat and offices with GEDIS and FEWITA. The CECD is currently planning a re-organization of its structure to ensure coverage of retail issues and effective corporate participation which will make it the centre of EC retail representation. It is based in Brussels, near the main Commission building.

* **The European Multiple Retailers Association (GEDIS)**

The representative of the European multiple retail organizations. It was formed from a fusion of FIGED and GEMAS. GEDIS shares a common secretariat and offices with the CECD and FEWITA and is based in Brussels. GEDIS participates closely in most of CECD activities and working groups.

* **The Federation of European Wholesale and International Trade Associations (FEWITA)**

The representative of international wholesale interests. It shares a common secretariat and offices in Brussels with CECD and GEDIS but remains fairly independent from the other organizations.

* **The Association of Retailer Owned Wholesalers of Europe (UGAL)**

The association of retailer owned wholesalers in Europe; it mainly represents co-operative buyers. UGAL works closely with the CECD at the working level on food and competition policy issues. It is based in Brussels, Belgium.

* **The International Centre for Companies of the Food Trade and Industry (CIES)**

The association "...functions as a club for its members, providing a forum of the profession through meetings and through publications ..." (CIES Annual Report). This organization has been in the past more orientated towards research and training projects rather than influencing EC policy. It is currently reorganizing its activities regarding EC policy. The CIES is coordinating its expertise on conference management with the CECD (i.e. European day of commerce). CIES is based in Paris, France

* **The European Liaison Committee of Traders of Agro-Food Products (CELCAA)**

The EC retail umbrella organization which assures the liaison of mainly European food retail federations, ranging from fruit and vegetables to cereals. GEDIS is a member of CELCAA, which is based in Brussels.

* **The European Retail Trading Centre (CECOD)**

An information exchange facility organized by a member of CECD predominantly for the members of the CECD. CECOD is based in Cologne, Germany.

* **The Liaison Committee for European Retail Trade Associations (CLD)**

A centre for information exchange between national retail organisations across Europe and European retail associations. GEDIS is a member organization. It is also based in Brussels.

* **International Association of Department Stores (IADS)**

A long established international organisation that researches department store retailing issues and is based in Paris, France.

* **International Federation of Grocers' Associations (UIDA)**

An international association representing the international grocery trade. It is based in Berne, Switzerland.

Vertical retail interests. The 1992 Longmans directory lists more than 40 EC wide retail organizations representing diverse sectoral interests from textiles and bookshops to pharmaceuticals. The more important of these are:

* **The European Mail Order Traders Association (AEVPC)**

An EC federation of mail orders traders. It has strong contacts with the CECD and is based in Brussels.

* **The European Union of National Associations of Health Food Stores (GEAMR)**

GEAMR represents an emerging new area of interest to consumers. It is based in Oberursel, Germany but its contacts in Brussels, other than on technical questions, are made through the CECD.

* **The European Federation of Dairy Retailers (UNECOLAIT)**

The association of dairy retailers based in London.

c The national retail lobby

Currently there are 6 national associations (Belgium, Denmark, Italy, Netherlands, Spain and the UK) which have an office or paid representative in Brussels and have a great interest in Commission activities. Since the UK association has had a prime role in internal policy-making both in the EC Commission and in the British Parliament it is useful to use it as a model.

The UK has in general an advanced set of interest groups and trade associations, probably due to the early development of parliamentary government and representative bodies. The UK retail lobby is well developed, with various interests represented through the British Retailers Association, the Co-operative Union Ltd, The Mail Orders Traders Association, the Specialist Retailers Group and the Voluntary Group Association.

These five organisations are the constituent members of the British Retail Consortium which acts as the umbrella association for UK retail interests. The British Retail Consortium has regular contacts (at least twice a week) with the Department for Trade and Industry (DTI) and less regular contacts with the Ministry of Agriculture and the Departments of Transport, Health and Social Security. The Consortium has opened an office in Brussels to become the first national retail organisation to be represented at the European level. This move may reflect the development of the retail industry in the UK and its interest in trading in a Single Market without physical frontiers. From 1979 onwards "the Retail Consortium placed increasing emphasis on channels of representation direct to EC bodies rather than through intermediaries" says Jane Sargent, in her book on 'Business & Politics in Britain' (see Appendix C).

d Identified Problem Areas

From first appearances it would seem that the retail lobby is in good shape. The EC retail trade has on paper a large number of organizations and a good network of contacts at both EC and national levels. It has an advisory committee to discuss issues with the Commission and has improved relations with the Parliament. However, there seems to be a recognition by both the retail trade and the Commission that retail interests are still not adequately taken into account in EC policy-making. Retailing is heavily impacted by different policy areas and it has been difficult so far to gain an integrated approach to commercial interests. The Commission acknowledged this fact in its 1991 communication "Towards a Single Market for Distribution", which in itself is a landmark in the Community's response to retail interests.

There are four main problems which essentially have caused the retail industry lobby to be atomized, diffused, and less effective than other groups at the EC level:

i Representation

- * Problems in the representativeness of the European trade organizations; many of the existing EC pressure groups represent sectoral retail interests. Creating a single organization could solve the issue.
- * Problems in obtaining direct company views and company participation in an EC trade organization. There is a ground swell movement in corporate circles to be informed more rapidly and systematically about the Community initiatives, to assess their impact on corporate planning and to have greater regular influence over the development of these initiatives.
- * Resource problems. The European federations have had limited success in obtaining physical or financial resources, arising from problems related to the structure of the industry and the nature of the representation.

ii Structure problems have arisen because of the:

- * Heterogeneity of retail lobby
- * Large number of sectoral trade organizations
- * Lack of appropriate liaison and the resultant competition for influence
- * Economic structure and progress of the retail sector.

iii Access

- * Access to government for the retail lobby has become complex because of the diffuse and heterogenous lobby structure.
- * Both industry and the European Commission recognise that the CCD advisory committee needs to be reformed in order to increase its effectiveness. One ground for criticism is that it has national retail organization representatives who, in contrast to other advisory committees, do not necessarily represent the views of the European organization as a first priority.
- * Instead of being mutually supportive, the diverse number of options used by the retail lobby have led to intense competition within the retail lobby itself for the attention of government officials at EC level. This phenomenon is not present at the national level to the same degree because of the more comprehensive nature of organizations such as the British Retail Consortium.
- * Despite the creation of DG XXIII the lack of focus for retail interests within the Community institutions has led to access problems, arising from the diverse number of contacts necessary to influence Community policies. A list of current and future issues in the Community which the retail trade might want to address is included in Appendix A.

iv The relationship between national and EC levels

- * There are a large number of EC initiatives which have attracted the attention of national organisations (including local authorities) and made them wish to get involved at the EC level. An example of a current and future area of interest can be found in the social dimension, where the attitude of national organizations, particularly in the UK, is not the same as their European counterparts. The protocol of the Maastricht Treaty on European Union grants all Member States, other than the UK, the ability to adopt common social legislation. UK business organizations will have to follow closely the development of social legislation in the rest of Europe in order to negotiate with British trade unions.
- * The 'subsidiarity' principle (i.e. that which is necessary to regulate at EC level is regulated in that way and that which can be left to Member States is regulated at the member State or local authority level) has been formally defined in the Treaty on European Union, but the retail lobby does not seem to have focused on it. There is a lack of liaison and allocation of issues between organizations at both national and European levels and this has led to an inefficient use of human and material resources. This phenomenon is true also of a large number of non-retail sectors and their organizations.
- * Underdeveloped national organizational co-operation in mediterranean countries; the problems of networking in Mediterranean countries have been caused by:
 - 1) the relatively late democratic development of these countries, particularly in Spain, and a lack of tradition of using trade associations as a focus for collective views;

2) late entry into the EC and the transition period for membership have meant an underdeveloped EC affairs industry and knowledge of institutions.

* National organisational involvement at EC level; The involvement of national associations directly at the EC level can lead to conflicts of interest with the European federations, particularly with regard to the representativeness of the interests being lobbied and the justification of resources allocated to them. A direct result has been the weakening of their collective voice at the EC level and a proliferation of bodies attempting to influence the Commission and the Parliament. The Commission thus has to choose between the messages it is receiving from national and EC sources. If an element of choice is given to the EC official the retail lobby would seem to have failed to direct the official along a single path and has thereby failed to provide the Commission with unity and clarity of argument.

* Liaison with other organizations; In order for the trade lobby to be effective at the EC level good and efficient liaison is needed between the organizations, as these are both numerous and have limited resources. An example of a move towards better liaison can be seen by the establishment of the CECD, FEWITA and GEDIS in the same location and their sharing of secretarial resources.

* Liaison problems may not be easy to solve, as they often result from the development of the retail lobby, the nature of retail activities and interests and characters involved. The Commission has made it clear that it prefers to speak to an organization at the European rather than at the Member State level. It also prefers to speak to one rather than several organizations in the same sector because of time and other constraints.

v Economic and Other Factors

Other papers in the Coca-Cola European Retailing Research series have been concerned with the structure of retailing across Europe and this report does not need to go back over what has already been said. However, it is useful to note those trends in retail structure that may affect the structure of the retail lobby.

The concentration of retailing, especially in food and other household goods, is particularly strong in Germany, France and the United Kingdom, where the retail structure resembled that of North America. Similar general trends can be observed in Denmark, the Benelux and the industrial regions of Italy, but the process of concentration and organisation has tended to occur further upstream. It is interesting to note that the developed retail trade associations, both national and international, are based in the most developed retail markets of Germany, France, the United Kingdom and the Benelux. Retail trade associations at the EC level tend thus to represent the interests of medium and large-scale retailing concerns in those countries; the so-called 'national champions'. These countries also have the longest history of consultation with trade and industry interests.

The commercial revolution arrived much later in Spain, Portugal, Greece, Ireland and rural areas of Italy. Retailing in those countries may continue to operate through large numbers of small shops and the process of concentration and organisation will occur further upstream. Retail trade associations are new in these countries (especially Spain where associations were banned under Franco) and tend to reflect the interests of small and medium sized retailing concerns. The national associations are also hindered by the strong regionalisation of trade, which is only now being eroded in favour of national champions.

The wholesale trade shows a similar uneven pattern of development. Specialisation and diversification in distribution upstream of the retailer is so complex that it is increasingly difficult to consider the wholesale trade as a single sub-sector. Wholesale activities are difficult to separate from mail order houses, cash and carry stores, upstream purchasing by retailers and the marketing, sales and distribution activities of manufacturing firms and suppliers of commercial services. The wholesalers' traditional intermediary role has been severely squeezed by large-scale retailing in both food and bulk raw materials areas.

There is a considerable difference in the structure of commerce in the Community from North to South. In the northern Member States the retail trade is very much more concentrated than in the Mediterranean countries. In the UK, for example, 80 per cent of turnover in food retailing occurs through about five major supermarket chains. This could lead at the EC level to a direct conflict of interest between the federations which represent the larger groups, such as GEDIS, and with those which predominantly represent smaller groups, such as UGAL and UIDA.

Within any national market, and also at the European level, there is a fundamental conflict of interest between the large multiples and smaller traders, who see the increase in economic and political power of the multiples as a direct threat to their continued existence. This is heightened by the trans-frontier or regional differences in concentration mentioned above.

As in many other sectors EC representation has evolved from national representation. EC federations are almost invariably financed by the national federations who are caught in the dilemma between needing representation in Brussels and seeing a haemorrhaging of power and funding towards the centre. This conflict frequently leads to the underfunding of the EC organization and a consequent atomization of the lobby. National organizations can even go so far as to set up their own Brussels office.

A recent example of this is the British Retail Consortium which originally was only a member of CECD and employed private consultants to look after their specific affairs in Brussels. It has recently joined GEDIS and in early 1991 set up its own office in Brussels, staffed permanently by one person. There has therefore been a dilution of the funds available to lobby at EC level. Other examples can be found; for example, with the Confederation of British Industry, the National Farming Union, the French farming union (FNSEA) and the Portuguese Farmer Unions. In many instances it is the strength of the national organization, compared to the European organization, that has determined the opening of an office in Brussels.

This historical construction of the Community means that in order to create more effective federal bodies by sector, the smaller organizations would have to disappear or be taken under an umbrella structure. It is not surprising that the permanent staff and the elected officers resist this trend, since the merger or disappearance of organizations would inevitably lead to job losses, changes of status for the permanent staff and loss of the opportunity for federation presidents to hold office.

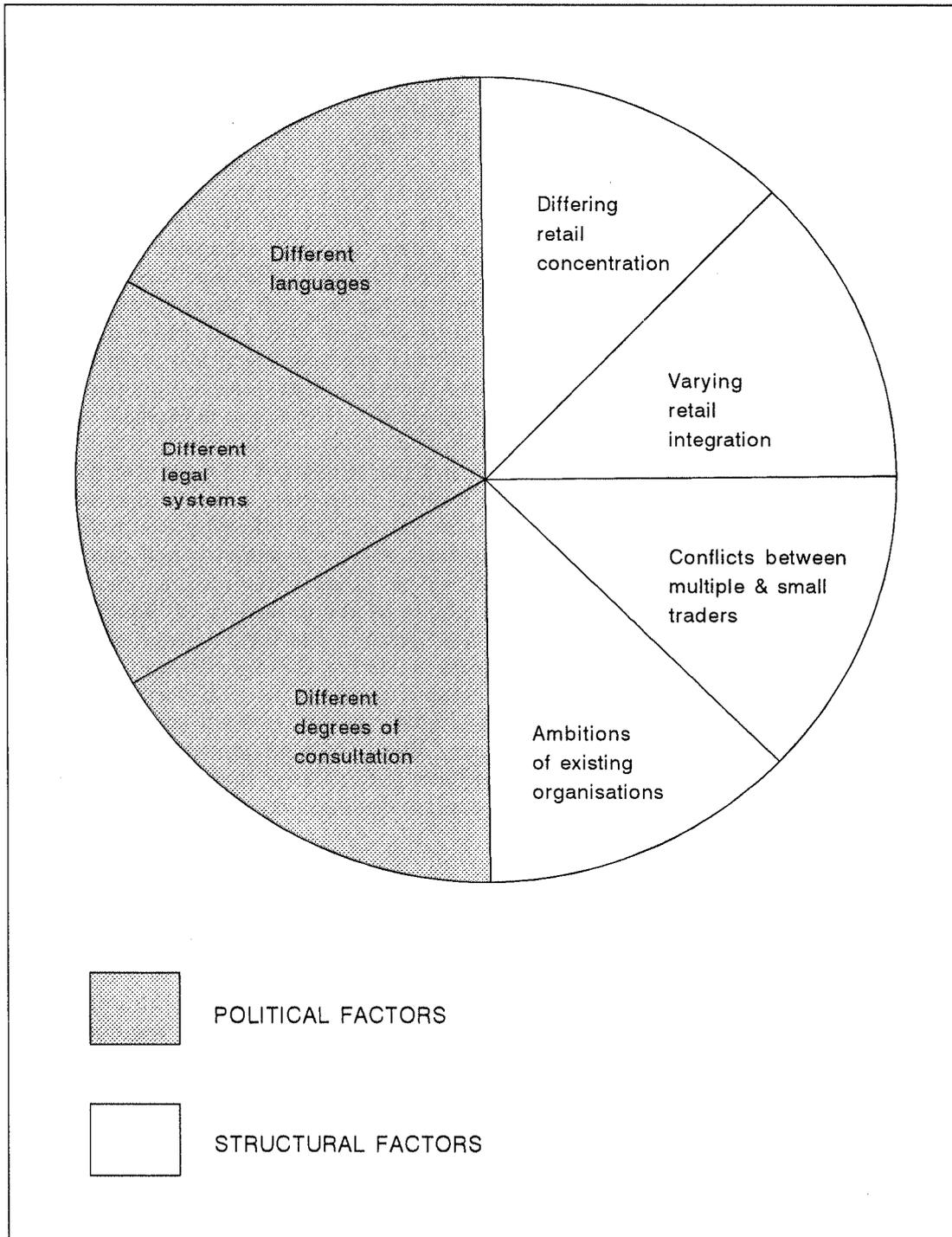
The sectoral, and some umbrella, EC retail trade organizations are normally provided with two to three permanent staff. They are thus unable themselves to provide the range of technical and legal services which are necessary to run an effective pressure group organization of the order of CEFIC and COPA. Important sectors of manufacturing industry are much better staffed; the Chemical Industry Federation CEFIC employs 80 staff in its Brussels office for example, although in general there is a high degree of atomization in the industry lobby also.

There are a number of other factors, chiefly political in nature, which tend to weaken the retail trade lobby particularly at the EC level. They are illustrated in diagram 3. Although all of these are historical and derive from the fact that the EC itself is in the process of rapid political evolution, some are related to the political structure of the Community whilst others are related to the economic structure of the retail trade itself.

Government at all levels, (local, regional, national or federal) in a democratic society involves the interaction of those who govern and those who are governed. There are many functions to be performed; policy formation, legislation, implementation and enforcement. In an international body like the European [Economic] Community the pattern is complicated by the different levels at which these functions are carried out. In addition, the jurisprudence of the EC Court of Justice can impose constraints on the freedom of action of national governments. Community policy inherent in the EC treaty may be developed into proposals for policy instruments by the EC Commission, enacted by the Council with the cooperation of the European Parliament, implemented by EC Member States and enforced at regional or national level. In the UK this may involve local authorities and in Germany the Länder. Business interests are not excluded from this equation and may interact with government to different degrees at all levels.

Although it is often said that, in terms of lobbying, Europe is several decades behind the US, this is based on an assumption that the US is an appropriate role model for Europe. Since the EEC is an evolving entity, models of industry/government interaction based on those which have developed in nation states may not be appropriate. In such cases the relationship between business and government may vary from an almost corporatist one (as in Japan, where business and financial interests have an extremely close relationship with government in the formation and execution of policy) to Germany (where the government, having heard the views of interested parties, sees it as its role to take 'independent' decisions). In other countries, such as France, there is an institutionalized consultation of the social partners, while in the UK the role of the NEDO (National Economic Development Organisation) has been allowed to wither but government consults actively with interested parties on a formalised basis unparalleled by other Member States.

DIAGRAM 3: FACTORS WEAKENING RETAIL TRADE LOBBYING AT MEMBER STATE LEVEL



In the US the use of trade and professional associations has been limited and greater use is made of direct representation through industry representatives, lobbyists and consultants. This is perhaps due to the greater concentration in industry and commerce, where the major actors do not feel the need for support from their colleagues in making their views heard; possibly also because US antitrust laws have discouraged cooperation between companies, even where competitive elements are not involved.

In the US the direction of legislation has been increasingly influenced by single interest groups which have exerted pressure on the legislature. These movements were strengthened by the decision of the Reagan administration to decentralise government. This has undermined federal preemption and led to state initiatives such as the Californian proposition 65 (Safe drinking water and toxic enforcement act voted in 1986 by Californian public referendum. CAL. Health and Safety Code para 25249.5 - 13). This act stipulates that "No person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual". This legislation did not occur at federal level and caused direct conflict between federal and state authorities over pharmaceutical and food products. Such conflicts have and will arise in the EC when 'unauthorized' subsidiarity occurs (a current notable example being the Italian SIMS law which provides that all securities dealing activities must be conducted through an Italian entity known as the Societa di Intermediazione Mobiliare (SIMS)).

In addition the law of liability and the system of litigation in the US has allowed single interest groups, such as consumers and environmentalists, to pressurize legislators through court cases, exploiting wherever possible state laws. The position of those willing to attack industry and commerce for placing goods on the market which could constitute a 'danger to the consumer' is strengthened even more by the possibility of 'bounty hunting'. Although a penalty may be in itself small, those bringing a prosecution have the possibility of claiming a penalty for each and every infringement. In a case such as lead migration from ceramic glaze, or as in a current case in the Californian court involving crystal glass, an infringement could be serving an individual meal on a plate or glass. The cumulated penalties could amount to very large sums. These forces have put industrial and commercial interests on the defensive and are a force for disintegration which could lead to an atomization of the US market.

In contrast, in Europe the use of primary EC legislation (article 30 of the EC Treaty) by companies, and in particular by the retail trade, has been a cohesive force in the EC. Such celebrated cases as the 'Cassis de Dijon', which reinforced the principle of the free circulation of goods within the Single Market, have had the effect, not only of establishing the right to trade across EC Member State frontiers but of fundamentally affecting the course of EC law-making and consequently the legal and political structure of the EC itself. The judgements of the Court, using the principle of proportionality, oblige Member States to take into account the economic interest of the trader and of the consumer in terms of access to markets and to goods and to use those measures which would be the least disruptive to the EC. The importance of these cases can be seen from the fact that the whole thrust of the 1992 White Paper programme derived from this case law. If Member States resisted harmonization, then they were faced with the principle of mutual recognition which was often a less acceptable solution.

The largest number of cases has been in relation to food and, although of the 143 cases reported up to the end of 1988 a very large number were brought by individual retailers, wholesalers and importers such as REWE, Albert Heijn, Delhaize and Bauhaus, none have been brought by retail federations. In other areas, such as the use of hormones, the manufacturers federation FEDESA brought the case rather than an individual firm. (Droit et Consommation XXI, Le Droit Communautaire Relatif aux Denrées Alimentaires. Patrick Deboyser. Story Scientia Leuven.)

It is difficult to decide whether the failure to use federations is due to the strength of the individual firm, the weakness of the federation or the fact that most cases originated in an individual prosecution in a national court. There is a natural tendency for companies to wish not to get involved in other firms' litigation even if the result is for the general benefit. Whatever the reason, the success of these cases has given individual firms the feeling that they do not need to talk to government since they can, through the Court, determine not only how government is carried on but, at this evolution stage of the Community, how its legal and political structure will be determined. The Commission has been an active partner in these activities, since it sees these cases as reinforcing the role of the Community against the protectionist tendencies of Member States.

5 OVERVIEW OF MAJOR NON-RETAIL ORGANIZATIONS BY SECTOR

To evaluate the EC retail lobby, it is useful to consider organizations in other sectors to establish whether there are any similarities in the types of problems encountered and how sectoral representation has been structured.

a The food industry sector

The food industry, in common with the retail sector, is extremely diverse in its activities, ranging from primary processing of food, through secondary processing some elements of retailing and catering.

The food industry, together with agricultural interest, is represented both at national and EC level by the largest number of sectoral trade associations (there are over 65 food industry associations at the EC level). The existence of a large number of food industry groups at the EC level bears some similarity to the retail trade lobby, the main difference being that there is an umbrella EC food industry association, the CIAA.

The CIAA was formed very late in Community history in 1981 and thus has missed building up influence with Community institutions. It does not have the large educational and consumer drive which the US FMI has assumed.

The effectiveness of the CIAA has been hindered by the conflict of industrial interests and lobby organizations and lack of direct industrial representation. Although attempts have been made at reform, national organisations are strong, especially in UK and the Netherlands where the food industry is the most developed and concentrated. The early existence of pressure groups in these countries, together with the late formation of the CIAA, has meant that national organizations still play a very strong role. The CIAA is relatively understaffed and cannot effectively face up to the large scale farming concerns as expressed through COPA, the major EC farm lobby organization. Consequently, its ability to influence policy

and public opinion is much less, as witnessed by the fact that in its response to agricultural and food policy issues it does not have to get the almost daily press coverage that the agricultural lobby does.

Sectoral organizations are also strong at both national and EC levels. A good example is the chocolate, biscuit, cake and confectionery sector represented at the EC level by CAOBISCO and at the national level strongly in the UK by the BCCA. Institutionalisation of communication and liaison of sectoral organizations at EC level through a newly formed committee is one of the most positive aspects of the recent reform and of the food industry and CIAA involvement.

Food industry representation also illustrates how member companies can become concerned about effectiveness of federation activities. Large firms, such as Nestlé and Unilever, have been key motivators for change. Long established European companies of American parentage, such as Philip Morris and Mars, are also important movers and shakers in the CIAA.

Wyn Grant describes the food industry as "not generally well organized for representational purposes" He notes that "when compared to agriculture, the system of associations appear highly pluralist in character, reflecting the heterogeneity of interests". This heterogeneity can also be observed in the retail industry. Grant's comments could be reproduced to describe the retail lobby "There are a large numbers of associations often serving very narrow interest categories. The domains of these associations often overlap, and there is sometimes direct competition for influence. Higher order associations are often poorly resourced, incomplete in their coverage, and with weaker links to those associations they do organize" (Grant & Coleman 1987 p. 212).

b The chemical sector

Like the food and agricultural sector, the chemical industry also has a large number of sectoral industry associations at both national and EC levels. Unlike the food industry, however, the chemical industry associations are bound strongly together within the CEFIC, the Chemical Industry Council. CEFIC has a structure which includes direct company representation at the EC level, thus bringing a more pragmatic approach to its operations.

This pragmatic approach is demonstrated in working groups and technical committees. This forms an effective, if somewhat organisationally complex, lobby structure. CEFIC associations, like those of FDF in the UK, are centrally based around one building with varying levels of independence of member organizations from the CEFIC structure.

CEFIC has strong links with US (SOCMA) and Canadian (CCC) interests with which it often produces joint statements, thereby lending credence to international influence.

The strength of CEFIC lies in its large number of contacts and the mix of company and federation interests which have made it one of the most influential lobbying organizations in Brussels. It is currently undergoing major reorganization which will bring corporate activities even closer to the frontline of EC policy-making and decision-making.

c General industrial interests (see UNICE and EC committee)

UNICE, the representative of European industrial employers interests, is an umbrella organization representing national employer federations. It is a federation of federations which has little direct corporate representation, although some industry reps sit on its working groups, (e.g. GATT, Data Protection, Export Controls). UNICE is considered to be a social partner with regard to the Commission and, together with the unions, enjoys a special consultative status on social legislation. It also has a good consultative status on trade and industrial policy matters, obtaining early drafts of legislation or policy positions direct from commission officials. It produces a large number of statements, which are on the whole general in nature.

The interests of American companies in Europe are represented principally through the national chambers of commerce which typically address legal and taxation issues as well as trade and investment information. The EC COMMITTEE was created to represent the views of European companies of American parentage (subsidiaries). It has direct membership of corporations which participate in the 12 cross-sectoral committees and 35 working groups. The corporate representatives prepare the positions of the organization whilst the secretariat coordinates the activities and facilitates the formation of policy and lobbying on positions adopted. The EC Committee has a huge information network and is linked into the national chambers and US organizations. It is considered in terms of its lobbying activities and publications on EC Affairs to be one of the most influential actors in the EC lobbying environment.

d Agricultural sector

Although this paper has so far examined industry groups, the sectoral organizations most successful in communicating their views to government at both national and EC levels are the agricultural producer groups.

The producer groups COPA, COGECA and CEJA have existed since the inception of the EC's Common Agriculture Policy in 1958 to monitor and influence the progress of the CAP. The Commission's policy which it wishes to affect can be influenced politically through the Cabinets, Permanent Reps, national civil servants and government members. The farmers' unions, despite some initial differences, are united in the focus of their activities.

The national organizations, which have much influence as they represent the interests of numerous large, medium and small farmers, participate in the national annual price review for agricultural products. Despite differences between farm organizations in the North and South of Europe they are fairly united in their views. Many of these national farm organizations have their own office in Brussels, such as the UK National Farmers Union, FNSEA (French Farmers Union), Landbruksraadet (Danish Farmers Union), PASEGES (Greek Farmers Union), Irish Farmers Association, COLDIRETTI, CONFRAGRICOLTURA, FEDERCONSORZI, CIC (Italian Farmers Unions) and the CAP (Portuguese Farmers Union). These offices usually employ about three people and are intelligence gathering sources as well as influencing on a daily basis the position of the European organization COPA/COGECA.

6 THE CHANGING ENVIRONMENT FOR LOBBYING IN BRUSSELS

a Community activities

So far as the Parliament is concerned, as a result of a report written by Marc Galle, MEP, and questions raised by Alman Metten, MEP, the Parliament commissioned a report and a public hearing on the issue of lobbying. The Parliament is concerned with the number of lobbyists and with access to information. Mr. Wijzenbeek, MEP, summed up the parliamentary debate in three clear messages "... there is no ideal form of lobbying, openness of the EP must be maintained and any action to limit access may have undesirable consequences ...". The Parliament has adopted a much more restrictive approach to lobbying than the Commission and is principally concerned with limiting the access of lobbyists to information, whilst also establishing a register of lobbyists.

Despite much criticism, the Commission is considered to be a fairly transparent institution. However the degree of transparency may not be uniform between, or indeed within, DGs and the Commission has no real focal point for dealing with lobbying activities and pressure groups. The Commission has no effective means at present to make working documents of the Commission publicly available other than through publication in the Official Journal. Often leaks occur of documents through national officials or on a complimentary basis by Commission officials themselves. The Commission has recognised that for many groups or individuals the access to information on EC initiatives is crucial to EC business activities. Some abuse of privileged information has occurred mainly from the press and national officials. The growth in the number of EC wide organizations from 300 in the 1960's, to 400 in the 1970's and 800 in 1992 bears witness to the enormous demand for Commission and Parliamentary airtime. It also demonstrates the diversity of interests now represented at the EC level.

The Commission in its 1992 work programme states "... lobbies are likely to proliferate once the Single market is in place. Relations between the Community's institutions and interest groups, useful though they may be, must be more clearly defined. Parliament has recently made moves in that direction. Consideration will therefore be given to a code of conduct to govern relations with organizations set up for the specific purpose of handling relations with the commission. This step will in no way compromise the freedom of trade or professional groupings or hinder essential dialogue with institutional committees".

The Commission's report is already at the 'soft pencil stage' and addresses three aspects:

* **External Aspects**

There should be registration of lobbyists and a code of conduct. The Commission could put in place a system where a body composed of a representative from each lobbying sector (Employers federation, Chambers of Commerce) and neutral observers would supervise a lobbying code. The register would be for organizations of a pan-European nature.

* **Internal Aspects**

There should be an internal code of conduct and rules and procedures; also more coordination with Parliament.

* **Availability of documentation and access to meetings**

More attention should be given to the holding of hearings and consultation with business interests.

The current Commission proposal requires a:

- * directory of all organizations;
- * central body overseeing a code of conduct and the collection of position papers;
- * central office to provide copies of Commission consultative papers at a minimal cost to any interested party;
- * cost benefit sheet to be published by Commission services with every proposal.

The result of both Commission and Parliamentary activities on the control of lobbying activities will have widespread implications for the future of talking to EC government and the structure of business interests at the EC level. If an organization representing retail interests is not on the suggested list of registration then it may be excluded from the direct dialogue with the Commission. Corporate representatives will certainly be hindered by such initiatives and especially consultants and lawyers.

Arguably the Commission's communication activities are of most concern. The Commission is obliged under Article 118b of the Treaty of Rome to consult with social partners "... The Commission shall have the task of promoting close cooperation between Member States in the social field to this end, the Commission shall act in close contact with Member States by making studies, delivering opinions and arranging consultations both on problems arising from the national level, and on those of concern to the international organizations...". This, however, only applies to social legislation.

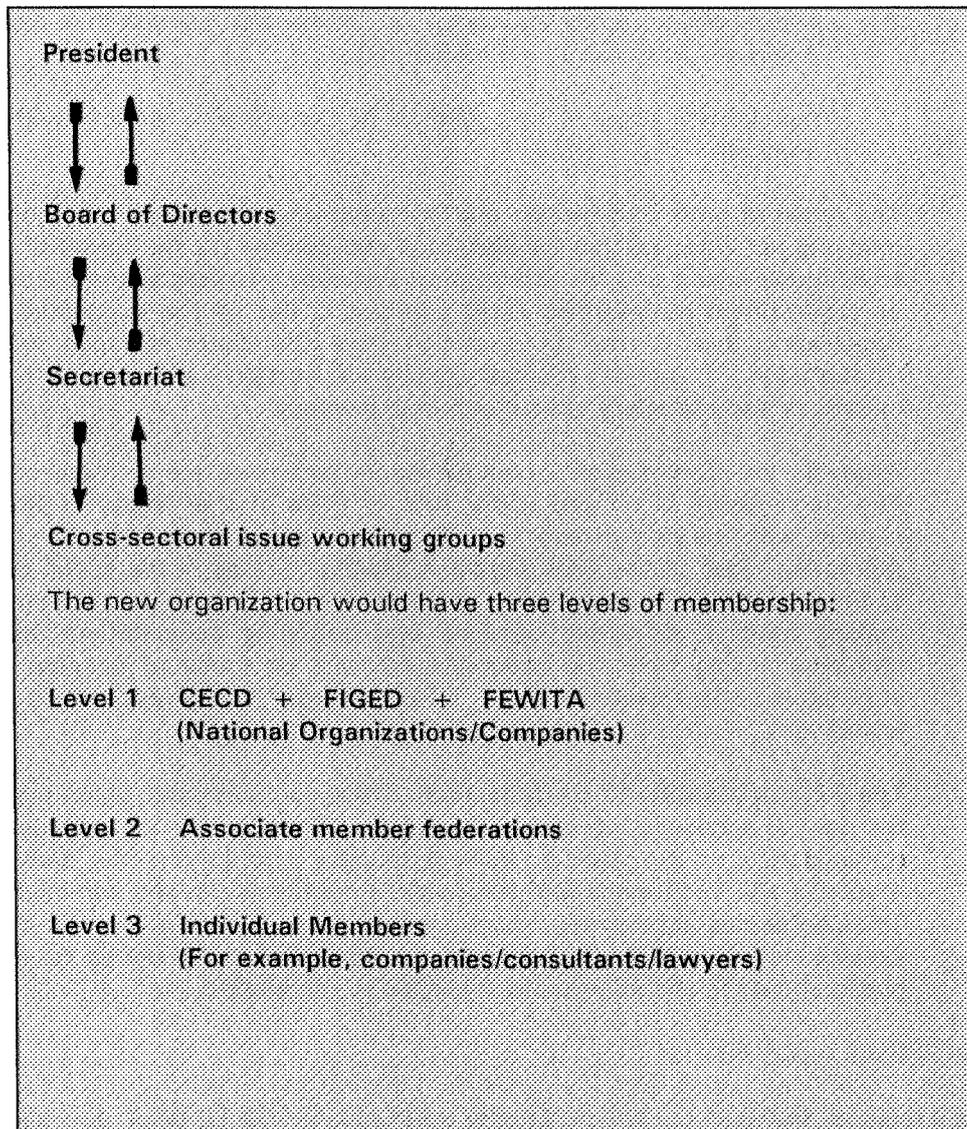
The 17th declaration to the Maastricht Treaty on European Union regarding the right of access to information states "... This Conference considers that transparency of the decision-making process strengthens the democratic nature of the institutions and the public's confidence in the administration. The Conference accordingly recommends that the Commission submit to the Council no later than 1993 a report on the measures designed to improve public access to the information available to the institutions".

b Retail trade representation

As a result of the need to concentrate the trade lobby at the EC level, developments are already underway to give trade interests a single voice in Brussels and the national capitals. At the heart of the new planned structure would be the three organizations CECD, FIGED and FEWITA with their joint secretariat and offices. CECD is cementing ever closer relations with FIGED and it is expected that the two organizations will merge in the near future. FEWITA may also merge with the CECD and FIGED but the particular interests of wholesalers need to be adequately reconciled within the new structure.

The first tier of the structure could be the national association representatives of the above-mentioned three organizations. The next tier in the new structure could be the associated retail organizations which would include some umbrella and vertical interest retail organizations such as CELCAA, CLD, CIES, UGAL etc.. A final tier could involve all other forms of trade representation, including direct company membership, consultancies and law firms. The resultant structure could appear along the lines illustrated in Diagram 4 below.

DIAGRAM 4: Possible future structure of EC confederation of commerce interests



M u

ch work remains to be done to concentrate the activities of the retail trade lobby but the need for concentration is underlined by the Commission's need for the focusing of business interests, the restricting of lobbying activities and the need for an effective corporate EC voice. In the light of recent discussions over the Maastricht Treaty ratification and the need for clarification of subsidiarity in the Community, effective networks between national and EC level organizations will be essential to ensure effective influence.

7 CONCLUSIONS

This study set out to examine the problems facing the retail trade when talking to governments, particularly at the EC level, and to compare the public affairs structure of the retail trade with those of other large heterogeneous interest groups.

The European Community is at a stage of rapid development and European public affairs are hard put to keep pace with this rapid evolution. Existing public affairs structures have developed through a historical process in parallel with the development of the Community institutions. As such, they reflect the pressures resulting from a national rather than a European view being taken by the national federations from which the European federations derive. To this can be added the heterogeneous nature of the retail sector itself and of its interests. The stresses and conflicts which have arisen have led to a progressive disillusionment with the current dialogue by all parties and the proliferation of actors trying to influence government, particularly at the European level. At the same time, with the internationalization of capital and markets and with increased global sourcing, companies are operating on a more multi-national basis. They are now tending to deal company to company rather than through a governmental or non-governmental organization.

Now that much of the Single Market legislation is in place, the retail trade will have a greater interest in seeing that it is effectively managed. It will be essential that adequate networks are developed between the Commission and the national bodies to enable practical solutions to be found by administrative cooperation rather than by further lawmaking. Particular attention will have to be given to the application of the principle of subsidiarity, which can on the one hand aid flexible administration, but on the other could be used as a protectionist device by national governments.

Those contacted during the research for this report suggested that "... trade organizations formally liaise their activities and if possible allocate responsibilities for issues. These representatives could be coordinated within a Council structure such as that of CEFIC together with national federations and companies. This would mean a liaison group of retail and wholesale trade organizations in one assembly and another assembly which could consist of representatives from national and European retail/wholesale champions ...". These recommendations have been largely met by the planned reorganization of the retail trade lobby described in the last chapter.

However, the reorganization so far does not deal adequately with direct corporate participation. The interests of national and multinational companies and retail alliances could better be reconciled with the views of trade organizations if companies were given an active role in EC federations. Company participation through national federations lengthens unnecessarily the communication chain and dilutes views by filtering them through two layers of administration in the national and European Federations. Company expertise and a pragmatic approach could be injected directly into the retail trade lobby at European level and coordinated through a collective structure. Some good models for these structures exist as in CEFIC and the EC Committee of AMCHAM. If the future of dialogue with government is to be orchestrated by the Commission, then business should form the orchestra and play through it.

The attention being paid to lobbying by both the Commission and the Parliament cannot but result in a greater structuring of the institution/pressure group dialogue. In such a scenario groups which have a well organized and coordinated structure will have the best access to policy makers and decision makers. The EEA, the developments in central Europe and the potential enlargement of the Community mean that public affairs in the retail trade will change rapidly and will have to be developed both on an EC and a pan-European level.

The structure of the retail trade lobby will need to be kept under continuous review and an institutional affairs working group could be set up and entrusted with this task as well as with following the Commission's activities on enforcement, such as in the Sutherland group and similar committees.

APPENDIX A: ISSUES RELEVANT TO THE RETAIL TRADE

Current and future EC issues for the retail lobby to address

These issues have been, or are currently, under discussion within the Community institutions with the likelihood of regulation in the future:

Company Law: Product Liability (EC directive.), Liability for Defective Services (EC Draft dir.) and the European Company Statute (EC Draft directive.).

Social Affairs: Social Dimension, Works Council, Worker Participation (EC draft dir.), Health and Safety for Workers (EC draft directive.).

Consumer Affairs: Labelling, Comparative Advertising, Advertising of Tobacco, Distance selling

Environment: Packaging, Disposal of Waste, Recycling, Eco-labelling, Eco-Auditing, Fiscal incentives for the Environment.

Transport: Transport Networks, Port of Entry and Port of Destination.

Telecommunications: Electronic Data Interchange, Green paper on telecommunications

Industrial: Industrial policy guidelines, Retail trade communication, Health requirements and labelling.

Trade: Single Administrative document, Port of Entry/ Port of Destination, Customs Reform, Negotiations in the Uruguay Round for a revised General Agreement on Tariffs and Trade, Common Agricultural Policy reform, Developments in Eastern Europe (in particular the signing of the Europe (Association) agreements with Hungary, Poland and Czechoslovakia and the possibility of establishing similar agreements with the Baltics, Bulgaria and Rumania). The negotiations with EFTA countries to establish an European Economic Area (EEA).

Financial Services: Payment Systems (EC discussion paper and report), Pension Funds, the Treaty on Economic and Monetary Union and the Commission report on legal barriers to the promotion of the ECU.

Competition Policy: Mergers and Acquisitions (EC draft and adopted proposals)

Fiscal: Fiscal Incentives for Environment (EC document), CO2 Tax, Harmonisation of direct (EC proposals and expert committee discussions) and indirect (VAT and excise duties) taxes

Intellectual Property; Trademark and data privacy (2 EC draft directives and a decision. Draft legislation in the pipeline for credit and direct marketing industry).

Research and Development: The reorganization of R & D in the forth multiannual programme. (Pandolfi document) Communication on bio-technology (Commission document).

General Policy areas: Maastricht ratification, Enlargement of the Community, CAP reform and Subsidiarity (definition of).

Other; Development and growth of DG XXIII. The regulation of lobbyists (EP discussions and report).

APPENDIX B: MAIN EC RETAIL TRADE ORGANIZATIONS

TABLE OF CONTENTS

AECGV	31
AEPC	31
CECD.	32
CECODE	32
CECRA.	33
CELCAA	33
CICILS.	33
CIMO	34
CLD.	34
COCERAL.	35
ECCTO.	35
EUCOLAIT	36
EUWEP.	37
FEWITA.	37
FIGED	38
FRUCOM	38
FTA.	39
GEAMR.	39
GEDIS	40
Poultry and Game Retailers.	41
UGAL.	41
UIDA/IFGA.	41
UECBV	42
UECGPT.	43
UNECOLAIT.	43

Much of the information in this Appendix is based on information in the 'Directory of Pressure Groups in the EC' published by Longmans, to which Oliver Gray was a contributor, and is used with kind permission of Longman Industry and Public Service Management.

AECGV	Association Européenne du Commerce en Gros des Viandes The European Association of Wholesale Meat Trade	
Address	29, Rue Fortuny, F-75017 Paris, France	Founded 1959
Telephone	(46) 22.93.80 Fax (44) 40.48.62	Languages French
Aims	To promote the interests of the European wholesale meat trade at the EC level.	
Scope	Members from the member states of the EC.	
EC Links	Contacts with DGs III and VI in the EC Commission.	

AEPC	Association Européenne de Vente par Correspondance European Mail Order Traders' Association	
Address	17, Avenue Edouard Lacomblé, B-1040 Brussels, Belgium	Founded 1971
Telephone	(2) 736.03.48 Fax (2) 736.05.42	Languages English, French
Aims	To promote the interests of the European mail order traders at the EC level.	
Scope	Deals in EC affairs and its members are from EC and EFTA countries.	
EC Links	Contacts with DGs III, XIII, XXIII and the Consumer Policy Service in the EC Commission.	
Statistics	Compiles statistics on the direct mail order industry.	

CECD	Confédération Européenne du Commerce de Détail European Federation of Retail Traders	
Address	123/133, Rue Froissart, B-1040 Brussels, Belgium	Founded 1981
Telephone	(2) 231.07.99 Fax (2) 230.00.78	Languages English, French
Aims	To represent and promote the views of the EC retail traders at the EC level.	
Scope	Deals with European affairs. It has members from both EC and EFTA countries. CECD is affiliated with the CECODE and the CLD.	
Activities	Liaises closely with other retail interests represented in the CECODE and the CLD. It publishes an annual report and information leaflets on retail trade in both of its working languages.	
EC Links	Contacts with DGs III, XXIII and the Consumer Policy Service in the EC Commission.	
Committees	Represented on the Commission's advisory committee for Commerce and Distribution.	
Statistics	A contributor to the Retail trade section of the EC Commission's annual Panorama of EC Industry.	

CECODE	Centre Européen du Commerce de Détail European Retail Trading Centre	
Address	89, Sachsenring, G-5000 Köln 1, Germany	Founded 1965
Telephone	(221) 339.81.36 Fax (221) 339.81.19	Languages English, French, German
Aims	To promote and coordinate the views of the European Retail Trade Organizations at the EC level. To exchange information with members of the CECD.	
Scope and Membership	Deals with EC affairs and its members are from associations based in all member states of the EC. The associations AEDT, CED, FEPA, FTA, GEAMR, la Fédération Internationale des Horlogers, Bijoutiers, Joualliers, Orfèvres Détaillants de la CE, the UIDA and UNECOLAIT are members.	
EC Links	Contacts with DGs III, XXIII and the Consumer Policy Service in the EC Commission.	

CECRA	Comité Européen du Commerce et de la Réparation Automobiles. European Committee for Motor Traders and Repairers.	
Address	46, Blvd de la Woluwe, Bte 10, B-1200 Brussels, Belgium	Founded 1984
Telephone	(2) 771.01.88 Fax (2) 772.65.67	Languages English, French
Aims	To promote the views of the Motor traders and repairers at the EC level.	
Scope	Deals in EC affairs and its members are from all member states of the EC.	
EC Links	CECRA has contacts with DG III in the EC Commission.	

CELCAA	Comité Européen de Liaison des Commerces Agro-alimentaires European Liaison Committee of Traders of Agro-Food Products	
Address	9, Rond Point Schumann, B-1040 Brussels, Belgium	Founded 1979
Telephone	(2) 230.99.70 Fax. (2) 230.43.23	Languages French
Aims	To promote the views of EC traders of agro-food products at the EC level.	
Scope	Deals with EC affairs and its members are European federations which have members from all EC member states and EFTA countries. The members of CELCAA are AECGV, AEEF, ASSUC, CIBEP, CIMO, COBCCEE, COCERAL, Confederation of EC game and fowl traders, EUCOLAIT, EUWEP, GEDIS, FIPA, FRUCOM, Florist Union, FEUPF, OPIC Europe, EUCOFEL, EURO-TOQUES and ACME.	
EC Links	Contacts with DGs III and XXIII in the EC Commission. CELCAA's members are represented on the Commission's advisory committee for commerce and distribution. CELCAA has contacts with the European parliament and ECOSOC.	

CICILS	Comité Permanent CEE de la Confédération Internationale du Commerce et des Industries des Légumes Secs EEC Standing Committee of the International Pulse Trade and Industry Confederation.	
Address	Bureau 286, Bourse de Commerce, 2, Rue de Viarmes, F-75040 Paris Cedex 1, France	Founded 1964
Telephone	(1) 42.36.84.35 Fax (1) 42.21.03.71	Languages English, French, Spanish
Aims	To promote the interests of the international pulse trade and industry at the EC level.	
Scope	Deals with EC affairs and its members are from EC member states.	
EC Links	Contacts with DG VI in the EC Commission.	

CIMO	Confédération of Importers and Marketing Organisations in Europe of Fresh Fruit and Vegetables	
Address	272, Avenue de Broqueville, Bte. 4, B-1200 Brussels, Belgium	Founded 1972
Telephone	(2) 771.36.35 Fax (2) 762.94.25	Languages English, French, German
Aims	To promote the interests of the EC importers and marketing organizations of fresh fruit and vegetables.	
Scope	Deals with EC affairs and its members are from EC member states.	
EC Links	Contacts with DG VI in the EC Commission.	

CLD	Comité de Liaison des Associations Européennes du Commerce de Détail. European Committee of Associations of European Retailers.	
Address	17, Avenue E. Lacomblé, B-1040 Brussels, Belgium	Founded 1980
Telephone	(2) 771.06.80 Fax (2) 736.05.42	Languages English, French, German
Aims	To promote the liaison and exchange of information between national and European retail organizations at the EC level.	
Scope	CLD deals with EC affairs and its members represent interests from all EC member states. AEPVC, EFF, IVE, UGAL and GEDIS are members of CLD.	
EC Links	CLD has contacts with DGs III, VI, XI, XXIII and the Consumer Policy Service in the EC Commission.	
Committees	CLD is represented on the Commission's advisory committee for commerce and distribution.	
Statistics	CLD is a contributor to the retail trade section of the Commission's annual panorama of EC industry.	

COCERAL	Comité du Commerce des Céréales et des Aliments du Bétail de la CE EC Committee of Cereals and Animal Feedingstuffs Traders	
Address	197, Rue Belliard, Bte.6, B-1040 Brussels, Belgium	Founded 1958
Telephone	(2) 230.61.70 Fax(2) 230.30.63	Languages English, French, German
Aims	To promote the interests of the Cereals and Animal Feedingstuffs Traders at the EC level.	
Scope	Deals with EC affairs and its members are from all EC member states.	
Activities	Provides a daily telex service on the problems of the cereals market and publishes a monthly newsletter.	
EC Links	Contacts with DGs III, IV and VI in the EC Commission. COCERAL also has contacts with the European Parliament.	
Committees	Represented on the Commission's cereals and cattle feed advisory committees.	

ECCTO	European Community Cocoa Trade Organisation	
Address	1, Commodity Quay, St. Katharine Docks, UK-E1 9AX London, United Kingdom	Founded 1974
Telephone	(71) 481.20.80 Fax (71) 702.99.24	Languages English
Aims	To promote the interests of the cocoa trade at the EC level.	
Scope	ECCTO deals with EC affairs and its members are from EC member states (Germany, France, Holland and the United Kingdom).	
EC Links	ECCTO has contacts with DGs III, VI and VIII in the EC Commission.	

EUCOLAIT European Union of Importers, Exporters and Dealers in Dairy Products.

Address 26, Avenue Livingstone, B-1040 Brussels, Belgium

Founded 1959

Telephone (2) 230.44.48 **Fax** (2) 230.40.44

Languages English, French, German

Status International Association (Belgium)

Aims To encourage study and research into intra- and extra- Community trade in dairy products and products derived therefrom. to give scientific and legal support in harmonizing national legislation. to represent the union's interests vis-à-vis the EC's institutions and other international organizations and associations.

Organisation & Structure EUCOLAIT has one general meeting a year, the nine members of the executive committee are appointed by the general assembly.

Resources EUCOLAIT has three full-time staff, the budget for 1990 was BF 7,000,000 and was financed entirely by members subscriptions.

Scope Deals with EC affairs and its members are from EC member states.

Activities EUCOLAIT publishes two times a month a members newsletter, plus a regular information service by Telex. It maintains links with CELCAA at EC level.

EC Links Contacts with DGs III and VI in the EC Commission. EUCOLAIT has contacts with the European parliament and ECOSOC. EUCOLAIT has contacts with ASSILEC and ASSIFONTE.

Committees Represented in the Commission advisory committees on dairy and dairy products, food, agricultural structures, customs matters and animal feed.

Assessment EUCOLAIT together with ASSILEC and ASSIFONTE has a strong network of contacts and influence at both national and EC levels. Its representation on several Commission advisory committee ensures that EUCOLAIT has a direct influence on policy-makers in the agricultural area.

Member Organizations

BELGIUM Belgian Dairy Trade Federation, Association Belge du Commerce Des Fromages (ASFROBEL).

DENMARK MD Foods, United Danish Butter Export Associations (BUTTERDANE).

FRANCE Fédération Nationale du Commerce des Produits Laitiers et Avicoles (FNCPLA), Distributeur, Syndicat National des Importateurs, Syndicat National du Commerce D'Exploitation des Produits Laitiers et Avicoles (SYLAITEX), Groupement Syndical des Exportateurs de Caseine (EXCA).

GERMANY Bundesverband Des Gros-Und Aussenhandels Mit Molkereiprodukten (GROMO), Export Union für Milchprodukte, Verband Des Deutschen Dauermilch-Gros-Und Aussenhandels.

ITALY Associazione Nazionale Stagionatori e Grossisti di Prodotti Caseari (ASSOCASEARI).

NETHERLANDS Stichting Gemeenschappelijk Zuivelsekretariaat (GEMZU).

SPAIN Asociación Espanola de Importadores de Productos Lacteos y Derivados (ANEIQ).

UNITED KINGDOM Dairy Crest Creameries, Philpot Dairy Products Ltd, Garden Cottage Foods Ltd, Brooks Mc Robbie Ltd, Staple Dairy Products Ltd, Ernest George Ltd.

SWITZERLAND Dairyworld SA. Genlac SA.

EUWEP	European Union of Wholesale with Eggs, Egg-Products, Poultry & Game.	
Address	2, Buschtrasse, D-5300 Bonn 1, Germany	Founded
Telephone	(225) 21.20.37 Fax (228) 21.09.89	Languages
Resources	EUWEP has a secretariat of 1 full-time staff.	

FEWITA	Federation of European Wholesale and International Trade Associations.	
Address	123/133, Rue Froissart, B-1040 Brussels, Belgium	Founded 1980
Telephone	(2) 231.07.99 Fax (2) 230.00.78	Languages English, French
Status	Asbl (Belgium)	
Aims	To represent the interests of the retail and wholesale trade vis-à-vis the European Community institutions.	
Organization & Structure	FEWITA convenes an annual general assembly and a board of directors meets four times a year. Representatives are appointed by national organizations to represent their interests on the board.	
Resources	FEWITA has three fulltime staff.	
Scope	Deals with European affairs and its members are from EC member states and EFTA countries.	
Activities	Organized several conferences on retailing issues, notably on the impact of the internal market and Eastern Europe. It produces a weekly information report and provides its members with an information service.	
EC Links	FEWITA has contacts with DGs I, II, III, IV, V, VI, VII, XI, XIII, XXI, XXIII in the EC Commission. It also has contacts with the European parliament. FEWITA has close contacts with GEDIS and CECD as well as other retail organizations.	
Committees	Represented on the Commission advisory committees for food law, commerce and distribution, agricultural consultative committees, European standing committee for employment, EC Customs committee and EC Payment Systems Committee.	
Assessment	FEWITA together with GEDIS and CECD work closely to influence EC institutions and have a good range of contacts with officials and other business organizations.	

FIGED	Fédération Internationale des Grandes et Moyennes Entreprises de Distribution International Federation of Retail Distributors	
Address	17, Avenue E. Lacomblé, B-1040 Brussels, Belgium	Founded 1969
Telephone	(2) 736.04.04 Fax (2) 736.05.42	Languages French
Status	ASBL (Belgium)	
Aims	To facilitate the exchange of information between members, notably by the exchange of ideas and experiences as well as all documentation on issues which interest large and medium sized retail companies. To promote the common professional interests of its members (including non-EC such as Austria and Switzerland) to the EC and other international organizations.	
Organization	FIGED convenes an annual general assembly which elects the four executive committee members.	
Resources	FIGED has one full time staff member and its 1990 budget of 5 000 000 BF was financed entirely by member subscriptions.	
Scope	Deals with European affairs and its members are from EC member states and EFTA countries (Austria and Switzerland).	
Activities	Produces a monthly newsletter for members. FIGED has close contacts with other retail organizations CELCAA, CECD, GEDIS. It is affiliated to the FTA and CLD.	
EC Links	Contacts with DGs III and XXIII in the EC Commission.	
Committees	FIGED is represented on the Commission's advisory committee for commerce and distribution.	

FRUCOM	Fédération Européenne du Commerce en Fruits Secs, Conserves, Épices et Miel. European Federation of the Trade in Dried Fruit, Edible Nuts, Preserved Food, Spices, Honey and Similar Foodstuffs.	
Address	Plan 5, W-2000, Hamburg 1, Germany	Founded
Telephone	(40) 32.64.14 Fax (40) 32.26.39	Languages
Aims	FRUCOM works to protect the interests of the import trade in dried fruit, almonds and other nuts, preserved food, spices, honey, and similar foodstuffs. FRUCOM promotes these products within the EC, particularly among authorities and institutions in the EC.	

FTA	Foreign Trade Association	
Address	5, Avenue de Janvier, Bte.3, B-1200 Brussels, Belgium	Founded
Telephone	(2) 762.05.51 Fax (2) 762.75.06	Languages

GEAMR	Groupement Européen des Associations des Maisons de Réforme European Group of Health Food Shops' Associations	
Address	6, Waldstrasse, D-6373 Oberursel, Germany	Founded
Telephone	(6172) 320.02 Fax (6172) 310.45	Languages

GEDIS	Groupement Européen des Entreprises de Distribution Intégrée European Multiple Retailers' Association	
Address	123-133, Rue Froissart, B-1040, Brussels, Belgium	Founded 1965
Telephone	(2) 231 11 26 Fax (2) 230 00 78	Languages English, French, German
Status	ASBL (Belgium)	
Aims	To inform members on EC matters and progress of legislation. To represent the interests of the members to the institutions of the EC. To promote the principles of free enterprise and competition to ensure the economic health of the entire sector and this to the benefit of the final consumer.	
Organisation & Structure	GEDIS convenes an annual General Assembly. The 23 members of the Executive Committee are elected/appointed by the General Assembly. GEDIS has six working groups (Agro-Food, Eco-Legal, Social, Consumer, environment and EFT/new technology) to analyze EC matters.	
Resources	A full-time secretariat staff of three run the day to day activities of the organisation.	
Scope	Deals with EC affairs and its members are from all EC member states.	
History & Achievements	GEDIS with other retail organizations was influential in the creation of DG XXIII for small and medium sized enterprises, tourism and commerce.	
Activities	Produces a monthly information bulletin on member activities and EC legislative initiatives. GEDIS also produces an annual report.	
EC Links	GEDIS has contacts with DGs III, IV, V, VI, XI, XV, XXI, XXIII and the Consumer Policy service in the EC Commission. GEDIS also has contacts with the European parliament (Environment and Consumer Affairs committee and the Economic and Monetary Affairs committee), ECOSOC and the secretariat of the Council of Ministers. GEDIS has contacts with the ICC, UNICE, BEUC, FTA and CIAA. It also has good contacts with CLD and CELCAA where it is a member. GEDIS has close contacts with CECD and FEWITA through the close collaboration of its technical working groups and joint statements.	
Committees	GEDIS is represented on the Commission's advisory committee for commerce and distribution.	
Statistics	GEDIS collects statistics on EC retail industry.	
Assessment	GEDIS is a relatively new organization which together with the other retail organizations CELCAA, CLD, CECD and FEWITA has good range of EC and national contacts to exercise influence.	

Poultry and Game Retailers European Confederation of Poultry and Game Retailers of the EC Confédération des Détaillants en Volaille et Gibier des Pays de la CE	
Address 8, Avenue Pasteur, B-1780 Wemmel, Belgium.	Founded 1969
Telephone (2) 512.61.78 Fax (2) 512.03.74	Languages French
Aims To promote the interests of the poultry and game retailing trade at the EC level.	
Scope Deals with EC affairs and its members are from EC member states. (Belgium, France, Germany and the Netherlands only).	
Activities The confederation convenes an annual general meeting.	
EC Links The confederation has contacts with DGs III, VI and XXIII in the EC Commission.	

UGAL Union des Groupements d'Achat Coopératifs de Détaillants de l'Europe Association of Retailer Owned Wholesalers of Europe.	
Address 3, Avenue L. Gribaumont, Bte. 7, B-1150 Brussels, Belgium	Founded
Telephone (2) 771.91.91 Fax (2) 771.32.52	Languages
Resources UGAL has a secretariat of 2 full-time staff.	

UIDA/IFGA Union Internationale des Organisations de Détaillants de la Branche Alimentaire International Federation of Grocers' Associations	
Address 1, Falkenplatz, Case Postal 2740, CH-3001 Berne, Switzerland	Founded
Telephone (31) 23.76.46 Fax (31) 23.76.46	Languages

UECBV	Union Européenne du Commerce du Bétail et de la Viande European Livestock and Meat Trading Union	
Address	81a, Rue de la Loi, bte. 9, B-1040 Brussels, Belgium	Founded
Telephone	(2) 230.46.03 Fax (2) 230.94.00	Languages
Status	ASBL (Belgium)	
Aims	To give all the members of the Union information on the sets of laws and regulations laying down the rules for solving the economic, trade, social, health, customs, transport and problems met in international livestock and meat trade; to defend and represent at international level the interests of the members of the member federations; to take any decisions and measures necessary for promoting the international livestock and meat trade; to examine the economic, technical, social and professional issues relative to the international livestock and meat trade and to give the interested parties information on such issues.	
Organization	A general assembly of the UECBV meets once a year and elects the board. The executive committee comprises 32 members.	
Resources	UECBV has a secretariat of 3 fulltime staff.	
Scope	EEC, Sweden, Switzerland, Austria, Norway, Poland and Hungary.	
EC Links	The UECBV has contacts with DG VI.	
Committees	The UECBV is represented on the Beef/Veal, Sheepmeat and Pigmeat Advisory committees of the EC Commission.	

UECGPT	Union Européenne du Commerce de Gros des Pommes de Terre European Union of the Wholesale Potato Trade	
Address	31, Van Stolkweg, JN-2585 Den Haag, Holland	Founded
Telephone	(70) 351.24.46 Fax (70) 354.42.90	Languages
Status	Association International.	
Aims	The Union studies all aspects of the wholesale potato trade. In 1956 the Union established the first Rules and Usages for the inter European Trade in Potatoes (last edition 1987), codifying professional usages and instituting a simple and effective procedure for valuation and arbitration, henceforth known under the name (RUCIP). Since that time RUCIP has been used for nearly all European transactions.	
Resources	UECGPT has a secretariat of 1 full-time person.	
Activities	UECGPT publishes Information bulletins monthly for members. UECGPT has links with the UN/ECE (Economic Commission for Europe of the United Nations) in Geneva, the FAO (Food and Agriculture Organisation) in Rome and the OECD (Organisation for Economic Cooperation and Development) in Paris.	
EC Links	UECGPT has contacts with the EC Commission.	

UNECOLAIT	Union Européenne du Commerce Laitier European Federation of Dairy Retailers	
Address	19, Cornwall Terrace, UK-NW1 4QP London United Kingdom	Founded
Telephone	(1)842.53.85 Fax (1) 841.62.40	Languages

APPENDIX C: BIBLIOGRAPHY

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