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The activities in Brussels of the local and regional authorities from European Free Trade Area countries

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ABSTRACT

This study analyses the activities of the local and regional authorities (LRAs) from EFTA countries in Brussels. It generates new and up-to-date knowledge on the mobilization in the EU by LRAs from EFTA countries; it enriches the literature on multi-level governance in the EU, so far mostly confined to the mobilization of LRAs from EU countries; and it contributes to the debate on lobbying in the EU by third-country actors. This research identifies three scenarios of engagement with the EU institutions: the first in which the Brussels offices predominantly engage in information-gathering and networking/liaison activities; the second in which the LRAs also engage in lobbying the EU; and the Swiss Cantons, that are fully integrated in the Swiss Mission to the EU.

KEYWORDS EFTA; Swiss Cantons; Norwegian regions; Icelandic local authorities; engagement with the EU

Introduction

Past research found that the main activities in Brussels of local and regional authorities (LRAs) from EU countries concern information-gathering, networking, liaising between the region and the EU, chasing funding and influencing policy. LRAs with primary legislative powers typically engage in lobbying of the EU institutions to influence policy, whereas LRAs without such powers tend to do so to a far lesser extent (Marks, Haesly, and Mbaye 2002; Callanan and Tatham 2014; Tatham 2017, 2018). How can we situate the LRAs from the European Free Trade Area (EFTA) according to this existing knowledge?

As well as contributing knowledge on a still largely unexplored aspect of LRAs' mobilization in the EU in relation to EFTA countries, this study enriches the literature on multi-level governance in the EU, so far predominantly confined to the mobilization of LRAs from EU member states (Hooghe and Marks 2001; Piattoni 2010; Panara and De Becker 2011; Rowe 2011;

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Stephenson 2013; Panara 2015; Tatham 2016; Pazos-Vidal 2019). By shedding light on lobbying by non-EU LRAs from EFTA countries, it also contributes to the debate on lobbying in the EU by third country actors (Gullberg 2015; Korkea-Aho 2016), as well as to the debate on lobbying by the regions in the EU (Tatham 2019).

This study focuses on EFTA countries as a cohesive group of countries that are in a similar position *vis-à-vis* the EU. All four EFTA countries (Iceland, Liechtenstein, Norway and Switzerland) have a close alignment with the EU single market, although there are differences between Switzerland and the others as to the mechanisms for ensuring that alignment.

No previous study has looked holistically at LRAs from EFTA countries. This contribution presents new empirical and up-to-date data on the Brussels offices of Norwegian LRAs, the Brussels representation of the Conference of Swiss Cantonal Governments and the Brussels representation of the Icelandic Association of Local Authorities. A rather outdated article (Baldersheim and Fimreite 2005) and a more recent master's thesis (Realfsen 2015), both in English, discuss the Norwegian LRAs' engagement with the EU, but they are not reflective of the current situation. There is abundant literature in German on the influence of the Swiss Cantons on the European policy of Switzerland and on the implementation in that country of legislation emanating from the EU (Jaag 2009), however this study supplies new and up-to-date data on the activities of the Swiss Cantons in Brussels. There is no literature in English on the Icelandic Association of Local Authorities.

The LRAs from EFTA countries are an important case study in the context of non-EU LRAs in Brussels. EFTA countries have a total population of over 14 million people and, with an overall nominal GDP of around \$1.2 trillion (which, together, would place them among the top 15 countries globally by nominal GDP in 2019) are among the most advanced economies in the world, as well as among the most important trading partners of the EU (currently Switzerland being the third, Norway the 6th and Iceland the 52nd; European Parliament 2019). The exit of the UK from the EU at the end of 2020 adds significance to this study, in that a number of LRAs from the UK that currently operate Brussels-based offices might soon be in a position similar to LRAs from third countries and might need to continue to seek political influence in Brussels (HoL EU Select Committee 2019, 30-31).

This research note analyses the LRAs from three of the four current EFTA countries – Iceland, Norway and Switzerland. The study does not include Liechtenstein, since the small size of this country implies that there is no substantial sub-state level of authority that deserves attention. These are three countries that feature a considerable alignment to EU single market rules, but that have rejected membership of, or closer alignment with, the EU. Norway held two referendums in 1972 and 1994, respectively, on membership of the European Economic Community and of the EU, both of which

opposed joining these organizations. In 1992, a referendum held in Switzerland rejected membership of the European Economic Area (EEA). In 2009, Iceland applied for EU membership, but in 2013 it withdrew its application.

Iceland and Norway, along with Liechtenstein, are members both of the EFTA, established in 1960 (Iceland and Liechtenstein joined in 1970 and 1991 respectively), and of the EEA established through the EEA Agreement of 1992. Unlike the other EFTA countries, Switzerland is an EFTA but not an EEA member. EEA membership implies that most EU single market rules, including those concerning the free movements, apply to EEA countries (Baudenbacher 2015, 2017), although not automatically; these countries have to incorporate any new relevant EU legislation into their domestic legal systems.

This study is based on five semi-structured interviews conducted between June and September 2019 with Brussels-based representatives of the Icelandic Association of Local Authorities, the Conference of Swiss Cantonal Governments and of three of the six Brussels offices of the Norwegian LRAs (North Norway, South Norway, Mid-Norway). Three offices (Oslo, Stavanger and West-Norway) did not take part in this study, but the sample used for this study is significant both numerically (half of the overall target group) and qualitatively, in that the study captures the main trends and types and in particular the divide in Norway between offices that engage or do not engage in lobbying the EU institutions, where by 'lobbying' I mean attempts to influence the EU's decision-making process in favour of one region (Jeffery 1996, 192; Marks, Haesly and Mbaye 2002, 6; Tatham 2017, 1090).

Description of the Case Studies and Relevant Background Information on Them

Norway features a three-level dynamic between the central state (and the extended role of the state through various types of bodies); the counties and a large number of municipalities. The counties do not have primary legislative competences, but have significant administrative responsibilities that they exercise through directly elected political representatives. A number of areas falling within the remit of the EU are of high interest to Norwegian LRAs, such as, the maritime agenda, the regulations concerning food processing industries and the rules on state aid, given that a number of Norwegian local authorities grant forms of tax relief to local companies and this practice may clash with those rules.

The South Norway region is a small region with c.ca 300,000 inhabitants. The Office was first established in 2005, but it exists in its current form since 2008. There are currently seven staff working for the Office. Three are based in Brussels, three in South Norway and one is currently temporarily working on a project in Luxembourg. The Office is a not-for-profit company owned by two counties which are, however, about to merge into one

county (Agder). These two counties own 70 per cent of the shares while a local city and a town own the rest. This arrangement is unique in Norway in that the Office is entirely publicly funded, whereas the other European offices adopt a membership model that involves public and private actors. The Office is therefore a public sector body that is subjected to the same laws on transparency and objectivity that apply to the civil service. Regional stakeholders directly or indirectly benefiting from the activities of the Office include regional research centres and universities, the industry sector and the blue economy sector. The work of the Office concerns, broadly speaking, all the opportunities arising for South Norway from the EFTA-EEA. It is therefore a wide-ranging mandate that leaves the Office considerable leeway for manoeuvre (Greenwood 2011).

The Mid-Norway Office exists since 2001. It is organized as an association owned by a number of members, currently 11. The most important is Trøndelag County Authority, that holds close to half of the total votes within the Office Board. Trøndelag County Authority is also the most important funder of the Office and it is the employer of staff working at the Office. Other members include local authorities, a local university (Nord University) and private sector organizations, including a bank. All members contribute funding to the Office's budget. Currently there are five staff working at the Office – two full-time and three part-time.

The North Norway Brussels Office is owned by three counties (Nordland, Troms and Finnmark) which contribute three-quarter of the budget. There are also other partners which, together, contribute one-quarter of the overall funding. These are two universities (Nord Universiteit and UiT, the Arctic University of Norway), a municipality (Tromsø), two regional councils (Helgeland and Salten, which are informal cooperation forums between neighbouring municipalities), the Norwegian Fishermen's Sales Organization and the Region Innovation Council. In the past the Office also partnered with local business organizations, but this is currently not the case apart from the Fishermen's Sales Organization.

The Office was first established in 2003 by Nordland County and since 2005 it has existed as the office of three counties and has been further expanded with a number of partners joining since 2005. The Office is registered as a lobbying organization and operates as an advocate in Brussels on behalf of North Norway. The North Norway Office is at present the only regional office from Norway engaging in lobbying of the EU institutions, although also the Mid-Norway Office is currently planning to undertake such activity in the future. From September 2019 the Office has three full-time permanent employees and two fixed-term trainees.

Iceland has a two-tier system of government with the state and the municipalities which have administrative responsibilities but no legislative powers. The key areas of intersection between the responsibilities of the Icelandic

municipalities and the EU include: EU environment and particularly waste legislation; EU labour and employment law, that are relevant to municipal employees; services legislation, given that the municipalities purchase and provide services (e.g. healthcare and education); and finally, since the Icelandic municipalities own companies (e.g. energy companies), EU rules applicable to these economic activities.

The Icelandic municipalities' Brussels Office employs one full-time member of staff. The Office is also supported by two Reykjavik-based staff. The Office is part of the Icelandic Association of Local Authorities, of which all the Icelandic municipalities are members, and is entirely funded by them. It was established in 2006; prior to that time the Icelandic municipalities used to delegate a representative to attend relevant meetings in Brussels, but this representative was not permanently based in Brussels.

EEA members have to take onboard the overwhelming majority of the new EU *acquis* – 80–90 per cent of the EU laws are implemented in these countries. Switzerland, by contrast, is in a *sui generis* position. It has concluded a series of bilateral agreements (approximately 100) with the EU. The Cantons, which are the constitutive parts of the Swiss Confederation, have been associated by the Federal Government in the negotiations of these agreements. Article 55 of the Federal Constitution of 1999 (a legal provision which was introduced to this purpose), gives the Cantons the right to participate in the negotiation of bilateral agreements that encroach upon their responsibilities (e.g. police cooperation, tax matters, education, road constructions, hospitals etc.) or that affect their vital interests. The Conference of Cantonal Governments was established in 1993 to rationalize the participation of the 26 Cantons in external affairs. It coordinates the positions of the Cantonal Governments *vis-à-vis* the Federal Government in relation to EU matters but also, more in general, in relation to matters concerning international trade.

The representative of the Cantons at the Mission of Switzerland to the EU is in place as a full-time post since 2002. Prior to 2002 there was a part-time representative. The representative reports to the Secretariat of the Conference of Cantonal Governments. He is supported by an assistant that he shares with the Mission of Switzerland to the EU and works closely with colleagues from various federal ministries with relevant responsibilities – a prominent example is the Ministry of Justice, due to the fact that Switzerland is part of the Schengen Area.

The remit of the representative is not confined to the EU, although most of his activities concern the EU. It includes, for example, also free trade agreements concluded by the EFTA with countries around the world if these trade deals have an impact on the responsibilities or interests of the Cantons.

The following three scenarios emerge from the analysis of these offices and of the representative of the Swiss Cantons: the funding, information gathering, liaison, building ties scenario (South Norway, Mid-Norway and

Icelandic municipalities); the soft lobbying on specific issues scenario (North Norway); and the fully integrated, diplomatically accredited federal sub-unit with legislative powers scenario (Swiss Cantons).

Scenario 1 – funding, Information-gathering, Liaison and Building Ties: South Norway; Mid-Norway; Icelandic Association of Local Authorities

The remit of these three offices includes a number of activities, such as, facilitating the participation by local stakeholders in funding programmes; gathering information concerning new EU legislation and policies; liaising with the EU institutions; and building ties with local authorities from other European countries. Their remit does not include lobbying the EU institutions, although the Mid-Norway Office is currently planning to develop lobbying in the future. Through their Offices, South Norway and Mid-Norway learn about new developments in the EU. These do not include only policy changes, but also the identification of best practice across Europe as far as the implementation of policies is concerned; for example, the municipality of Ljubljana (Slovenia) is the leader in relation to waste management and South Norway's authorities have learned from it. The South Norway Office created an online platform for regional stakeholders which aggregates a number of examples of best practice and know-how from across the EU and publishes strategic briefings for the community.

The South Norway and Mid-Norway Offices, as well as the Office of Icelandic Association of Local Authorities, promote awareness among local stakeholders of the opportunities that arise from the relationship with the EU; in particular, funding opportunities, such as Horizon 2020, Creative Europe, Erasmus+, Norway and EEA grants. The South Norway Office organizes group visits of stakeholders from South Norway to Brussels to learn about the EU and opportunities available to the region. The Mid-Norway Office produced a position paper concerning the Creative Europe 2021–2027 proposal which was incorporated into a white paper of the Norwegian government that outlined the relevance of the programme to regional actors from Norway. Mid-Norway Office and Icelandic Association of Local Authorities are particularly active in supporting universities and research groups in creating the networks and consortia for Horizon 2020. Currently the Mid-Norway Office is the secretariat to a project with stakeholders from Mid-Norway that aims to promote more Horizon 2020 applications.

The offices of the Norwegian regions in Brussels promote the image of the respective regions. The South Norway and the Mid-Norway Offices promote knowledge of the good practice, technological solutions and creations from these regions (e.g. through the organization of conferences). For example, South Norway has developed very advanced technology in the

field of e-health which the Office shares with relevant organizations. Mid-Norway showcased certain high-speed boats invented to sail in the Norwegian fjords during the European Days organized by the Office in partnership with the Norwegian delegation to the EU. Both Offices see Brussels not only as the headquarters of the EU, but also as a hub to liaise and network with other regions and the companies from those regions.

South Norway and Mid-Norway participate in the European Regions Research & Innovation Network (ERRIN). Since 2010 South Norway has been a member of ERRIN and a representative from the Office currently sits on the Board of this organization. This is an important forum to acquire know-how, as well as for the purpose of building consortia for funding applications and collaborative projects. For example, through ERRIN South Norway developed a partnership with the LRAs from North Netherlands due to their geographical proximity and common interests with Norway. The Mid-Norway Office, which is planning to engage in lobbying in the future, sees the networking activity of the Office as conducive to possible future alliances with LRAs from EU member states for joint lobbying purposes.

The South Norway Office is the only office that helps its regional stakeholders to write their funding applications for EEA grants, an activity that requires considerable technical expertise. In addition to EEA grants, there are the Interreg programmes (all of which depend on interregional collaborations), some of which are available to Norway. These programmes are particularly popular in Norway due to the higher success rate compared to other programmes, such as, Horizon 2020. South Norway currently participates in the programmes concerning the North Sea and the Baltic Sea, as well as the programme concerning the Atlantic and the Norway-Sweden partnership. Annually, the Office brings back to the region, in terms of European grants, 2.5 times what is invested in the Office by the LRAs. To this figure, the South Norway Office pointed out, one has to add less quantifiable benefits, such as, the advantage to the regional economy generated through the information that the Office supplies to the region and its economic players.

The position of the Brussels Office of Icelandic Association of Local Authorities is not substantially different to South Norway and Mid-Norway. Its principal task is observing legislative developments in the EU. This includes collecting information about legislation that is in the pipeline, as well as keeping up to speed with legislation that has been approved recently. The Office also delivers impact analyses on how the novel legislation is expected to impact on these authorities.

Influencing the EU institutions through lobbying, which is one of the primary tasks of a number of Brussels offices of the LRAs from the EU member states, is quite problematic for Icelandic municipalities. This is because Iceland is not a member state and is a small country with little leverage. Accordingly, building coalitions and alliances with LRAs from other

countries is crucial for Icelandic municipalities – with LRAs from other EFTA countries, but also, due to their similar economic interests, from other North European countries, such as, The Netherlands, Sweden and Denmark. Since some of these countries are in the EU, these coalitions add strength to the influence of Icelandic municipalities on the EU institutions. Membership of European networks, such as, the Council of European Municipalities and Eurocities (of which Reykjavik is a member), is therefore crucial for the Icelandic municipalities.

The Committee of the Regions too is of some importance to the Icelandic municipalities. Although these are not among its members, it is quite important to have contacts with this EU body and especially with LRAs that are part of it, because, even though the Committee's opinions are only advisory, these opinions are taken into account by the institutions in the legislative process (Ricci 2011; Panara 2015, 137; Piattoni and Schönlaui 2015). The Committee of the Regions is useful, more in general, in order to obtain information in real time on the laws that are relevant to the Icelandic local authorities.

Scenario 2 – soft lobbying on specific issues: North Norway

The North Norway Office does not limit itself to gathering information concerning forthcoming changes to EU law and policy and the other activities identified in relation to the first scenario. This office also tries to influence EU law and policy through a 'soft lobbying' of the EU institutions; for example, North Norway often supplies data to the Commission. The Commission welcomes this input because it has limited research facilities and usually relatively little information about problems affecting Norway. Whilst there is no structured cooperation with the other regional offices from Norway in this particular field, primarily because the other offices do not engage in lobbying, there is close cooperation and exchange of information between the Office and the Norwegian Mission to the EU. Although there is no formal joint strategy between the Norwegian Mission and North Norway, this situation does not usually give rise to frictions because Norway's national interest in relation to certain themes coincides with North Norway's.

In 2008, the EU initiated the development of the EU Arctic policy (Holdhus 2010). This is of particular importance to North Norway. The initial draft of the policy focused largely on climate change and environmental protection, but North Norway felt that, overall, it evidenced a lack of detailed knowledge about the Arctic region. North Norway is reliant upon resources located in the Arctic – fish, minerals, energy etc. The approach taken by the EU would have limited a number of economic activities that are essential to North Norway's economy and for this reason North Norway decided to lobby the EU institutions in order to influence this new policy. The EU Arctic policy of 2016 (European Commission and High Representative of the EU for Foreign

Affairs and Security Policy 2016) appears more focused on sustainable development in cooperation with the peoples living in the Arctic compared to the initial draft. To achieve this result, North Norway lobbied the European institutions jointly with LRAs from North Finland, North Denmark and Sweden (all EU member states), as well as organizations of Sámi people, Greenland, Iceland, the Faroe Islands and others, which, due to their geographical location, share similar economic interests to North Norway. Along with North Norway, all these regions and groupings are part of the Arctic Stakeholder Forum established by the Commission to develop the EU Arctic policy. According to the North Norway Office, since the creation of the Forum the Commission has been receptive of the point of view of regional stakeholders including North Norway and has worked constructively with the northern regions.

Another example of lobbying concerns the work that the Office does, along with regions from North Sweden and North Finland, to raise awareness by the EU institutions of the particular working conditions of companies from these regions. Due to the distance from central Europe, there are extra-costs related to transport that affect companies in North Norway when exporting goods into the EU. Like in most districts outside the largest towns in Norway, employers from North Norway (both from the public and the private sector) benefit from a lower payroll tax that helps them offset this extra-cost. This might be problematic in light of the EU rules on state aid.

North Norway has close links to a number of regions from the EU. These relations are occasionally conducive to joint lobbying initiatives that have the potential to enhance the influence of North Norway in EU decision-making processes. For lobbying purposes but also, more in general, to promote the region and its economy, the Office organizes trips to North Norway for 12–15 MEPs at a time who can learn about the universities and more in general the economy and society of North Norway. This is a way to put the region on the map of EU policymakers.

Finally, although it is not within the remit of the Office to promote investment in North Norway, occasionally the Office promotes the know-how and expertise available in the region, for example in relation to satellite services and observation systems for surveillance or methods to tackle pollution, as well as in relation to the blue economy and fishery sector.

The Office also engages in the same activities as the other Norwegian offices in relation to Horizon 2020 and ERRIN.

Scenario 3 – fully Integrated, Diplomatically Accredited Federal sub-units with Legislative Powers: Swiss Cantons

The remit of the representative of the Cantons in Brussels embraces three areas: monitoring Swiss-EU relations affecting the responsibilities and

interests of the Cantons; keeping up to speed with developments in the EU in general; and networking. He does not engage in lobbying the EU institutions.

The Brussels representative is a member of the Mission of Switzerland to the EU on an equal basis with the representatives of the Swiss Federal Administration. He participates in meetings of the Swiss Mission and has access to documents related to topics concerning the Cantons. Sometimes he attends meetings with the EU institutions as part of the Mission. The interests and responsibilities of the Swiss Cantons are wide-ranging as Switzerland is a federal state and the Cantons, even in fields where they do not have legislative power, are often responsible for the implementation of federal laws. This implies that there is an interest of the Cantons in virtually any matter that requires negotiation with the EU.

The Swiss Mission to the EU comprises 50 staff. This figure includes the Head of Mission (the Ambassador), over 20 diplomats and administrative support staff. Members of the Swiss Mission write a high number of reports and occasionally the representative of the Cantons writes his own reports for the Conference of Cantonal Governments or shares with his cantonal colleagues in Bern the reports produced by the Swiss Mission. This information may be incorporated into documents prepared for the Conference of Cantonal Governments or be dispatched by the Secretariat of the Conference directly to the cantonal administrations.

The representative of the Swiss Cantons maintains relations with regions near Switzerland which are represented in Brussels, such as, Baden-Württemberg, Bavaria, Lombardy, Piedmont, Auvergne-Rhône Alpes and Bourgogne-Franche-Comte, but also with UK devolved administrations. These networking activities, however, are for good relations rather than for business purposes. The Swiss Cantons do not use networking as an instrument to seek political influence in EU decision-making, but as a way to obtain information on EU policy. This lack of lobbying by the Canton representative is due to his full inclusion in the domestic process to shape Switzerland's position on EU affairs. Being fully integrated domestically and in Brussels (through diplomatic accreditation), there is little need to carry individual lobbying in Brussels.

The representative of the Cantons attends the meetings of the Committee of the Regions as a member of the general public, when these concern topics relevant to the Swiss Cantons, such as, public services or subsidiarity. Some Cantons participate in the EU's Interreg programme and some are present in Strasbourg and take part in the activities of the Congress of Local and Regional Authorities of the Council of Europe. The Conference of Cantonal Governments represents the Swiss Cantons in the EEA-EFTA Forum of Local and Regional Authorities. This is a body with an advisory role similar to the Committee of the Regions in the EU. The Conference of Cantonal Governments has observer status in the Forum which meets twice a year. The

Swiss Cantons were also observers in the no longer operational Conference of European Regions with Legislative Power.

Data Analysis and Concluding Remarks

The impact of EU legislation and policies on the EFTA countries is such that the LRAs from these countries behave in a similar way to the LRAs from the EU member states, which, since the 1980s, have established a multitude of representative offices in Brussels (Rowe 2011, 7; Committee of the Regions 2017). Although some LRAs from the EFTA countries were already active in Brussels before 2001, all the analysed offices, including the representative of the Swiss Cantons, have been established between 2001 and 2006, prior to the 2008 financial crisis and during a period of relative growth of the EU integration project despite the failure of the Treaty Establishing a Constitution for Europe. The 2001–2006 period came after the decision made by some EFTA countries during the 1990s not to join the EU (Norway) or the EEA (Switzerland), whilst Iceland's membership negotiations began in 2009 before being eventually shelved in 2013. This sequence of events suggests that the creation of better resourced offices in Brussels is part of the reorganization of the EFTA countries' relationship with the EU after or in parallel to the choice to remain out of the EU or of the EEA, while at the same time remaining closely aligned to the EU single market.

The analysed offices are either entirely owned by LRAs (Iceland, South Norway), or predominantly owned by LRAs but with a membership that includes local universities and private sector organizations (Mid-Norway and North Norway). The second type of structure is typical of a number of Brussels-based offices of the English LRAs (Panara and Varney 2017). The representative of the Swiss Cantons is part of the Swiss Mission to the EU.

In terms of size, if one looks at the number of Brussels-based full-time employees only, the number of permanent full-time staff ranges from a minimum of one and a maximum of three. The size of the offices appears small if compared to the representations of the German *Länder*. For example, the *Land* Baden-Württemberg operates a representation staffed by over twenty people (Panara 2015, 135). However, that *Land* has more than double the population of Norway and a higher GDP than Norway. Furthermore, the German *Länder* are regions with legislative powers and a constitutional standing that cannot be compared to the LRAs from Norway and Iceland. These regions have the power to implement state laws including those originally emanating from the EU but do not have primary legislative powers. The size of EFTA LRAs' Brussels offices is comparable to that of most English LRAs' European offices (Panara and Varney 2017, 5-7).

The analysed offices engage in a number of activities. The activity which is common to all the analysed LRAs is the gathering of insights on forthcoming

EU policy changes. This is key to the LRAs for two reasons: first, because the new EU legislation may have an impact on local economy and public services; second, because LRAs are responsible for the implementation of the new EU rules in areas that fall within their remit.

Lobbying of the EU institutions to influence policy is part of the remit of North Norway (currently the only one, among the six European offices of the Norwegian LRAs, to engage in lobbying). There is some evidence that LRAs see lobbying as increasingly important for non-EU LRAs from EFTA countries. This is demonstrated by Mid-Norway's current plans to engage in this activity in the future while the Icelandic Association of Local Authorities highlighted the desire, but also the difficulty for Icelandic municipalities, to influence EU policies. The Swiss Cantons do not engage in lobbying because they shape EU-Switzerland relations through their participation in the negotiations of the sectoral agreements between Switzerland and the EU (Realfsen 2015, 41-42). The lack of engagement in lobbying by five out of six Norwegian Brussels offices (four out of six, if Mid-Norway is included) may depend on a number of reasons. Since all the interviewed officials from EFTA LRAs commented on the difficulty to influence effectively EU legislative processes through lobbying, this suggests that Norwegian LRAs see lobbying as too time-consuming and costly, as well as conducive to little results. Additionally, these LRAs do not have legislative competences and are quite poorly staffed in Brussels (Marks, Haesly and Mbaye 2002, 15-16; Callanan and Tatham 2014, 195, 198-200; Tatham 2017, 1092).

LRAs from EFTA states engage in a number of networking activities with a range of economic and political actors from the EU. These networking activities are conducive to the exchange of information and know-how. The offices that engage in lobbying use their networks to create alliances and coalitions in order to enhance their political influence in the EU. This practice is similar to that of LRAs from EU member states (Panara 2015, 151), with the peculiarity that EFTA LRAs capitalize on the EU status of their 'allies', both in terms of extracting information which would not otherwise be easily accessible and in terms of increased political influence. This is significant for multi-level governance theory in that it reveals that mobilization of sub-state actors in the EU and coalitions are not limited to EU actors and include LRAs from non-EU countries. Whilst there is no evidence suggesting that EU policies are shaped decisively by EFTA LRAs, it is at least noteworthy that these LRAs are active in building coalitions that can influence EU decisions.

It is also noteworthy that the study of the offices of EFTA LRAs revealed a different dimension of the role of the Committee of the Regions. This advisory body which is used by EU LRAs as a forum for discussing and influencing policy, becomes for non-EU LRAs an opportunity to liaise with other LRAs and obtain information.

All the analysed offices from EFTA countries, with the exception of the representative of the Swiss Cantons, provide support for funding opportunities emanating from the EU. The support ranges from forwarding the relevant information to local stakeholders to the actual assistance to applicants from the region. This stream of activity is prominent also in relation to European offices of LRAs from the EU (Rowe 2011, 83-125; Panara 2015, 127-154; Panara and Varney 2017). The representative of the Swiss Cantons does not engage in this type of activity due to the particular nature of his role.

One EFTA model of engagement in Brussels by non-EU LRAs does not exist. There are similarities across LRAs from EEA countries, the main divide being between LRAs that engage in lobbying and those that do not do so. There could be, however, an ongoing trend among LRAs from EEA-EFTA countries towards expanding their lobbying activity, as the example of Mid-Norway demonstrates. All in all, with the exception of lobbying the EU institutions, the analysed offices engage in the same type of activities as the LRAs from EU member states. This is not a surprise because the EFTA countries and their LRAs are largely integrated into the EU single market. It is fair to say that there is no huge difference between LRAs from the EU and those from EFTA countries in terms of the scope of their activities in Brussels. The analysed offices lamented the difficulty to influence the EU institutions due to the fact that they are not part of the EU and the small size of their country. All reported that alliances with LRAs from EU member states help mitigate these limitations.

Across the analysed offices the key difference is between the Swiss Cantons and LRAs from other EFTA countries. When he describes the different approach to the Brussels game by the Swiss Cantons and the Norwegian regions, Realfsen (2015, 6) downplays the impact of the different constitutional standing of the Swiss Cantons compared to the Norwegian LRAs. The Swiss Cantons, though, are constitutional regions with certain constitutional prerogatives (e.g. legislative and external relations powers), whilst the LRAs from the other EFTA countries are regions with powers of implementation of state and EU laws, but do not have primary legislative powers. The participation of the Cantons in shaping the relationship between Switzerland and the EU is institutionalized through intra-state channels, in that the Cantons are part of the relevant negotiations with the EU and portray their position directly to the Federal Government during these negotiations. This finding reflects the position of what Callanan and Tatham call 'stronger regions', meaning essentially the regions with legislative powers (such as, the Austrian *Länder*), that usually give priority to intra-state interest representation channels (Callanan and Tatham 2014, 195 and 202; Tatham 2017, 1093-1094).

The reception of new EU laws in Switzerland requires bespoke agreements. As a result, for the Swiss Cantons the real political game takes place in Bern,

where they have the opportunity to shape the approach of the Federal Government to various EU policies, rather than in Brussels. The participation mechanism created for the Cantons prevents the typical multi-level governance dynamic whereby the LRAs go to Brussels and engage in their own para-diplomacy. The entire mechanism in place for the Swiss Cantons aims to ensure that their voice is heard while maintaining the coherence of Swiss external relations. This marks a difference between Switzerland and federal states that are members of the EU, such as, Germany and Austria. The German and the Austrian *Länder* enjoy participation mechanisms that influence or, occasionally, determine the position of these member states in the Council but, due to the automatic application of the EU legislation in the member states, they also lobby the EU institutions through their Brussels-based offices (Jeffery 1997; Eberhard 2011, 231-232; Realfsen 2015, 59-65; Panara 2015, 135-137).

North Norway and Mid-Norway clearly have peculiar needs that encourage them to seek direct influence in Brussels and the same seems to be true for the Icelandic Association of Local Authorities. So, one key tenet of multi-level governance, that is, that many sub-state actors from the EU engage directly in the Brussels political arena, has to be re-thought or fine-tuned in light of this finding – that also non-EU LRAs go to Brussels and participate in the political processes. This happens because the EFTA countries and their LRAs are ultimately part of the European integration process *latu sensu*.

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