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The response of EU trade dependent firms to the globalization backlash

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Abstract

This paper seeks to expand our understanding of Corporate Political Activity (CPA) in trade policy by exploring the strategic responses of EU trade dependent firms (TDFs) to the recent backlash against globalization. We develop propositions on likely corporate strategies in this context and explore them in the EU. Our empirical focus is on four cases of trade policy changes over the period 2016-19 which reduced, or threatened to reduce, openness in different ways and with varying sectoral impacts. Propositions were explored through the analysis of public actions by TDFs and their associations, as well as 26 interviews. We find that few EU TDFs mobilized independently against protectionism. Rather, they overwhelmingly worked through their trade associations. Furthermore, the extent to which sectoral associations mobilized together or alone varied depending on the issue area and nature of the threats. We find limited evidence of trans-national lobbying or mobilization with civil society groups beyond the specific issue of Brexit.

Key words: trade; corporate political activity; lobbying; globalization; trade dependent firms

Introduction

In recent years criticism of globalization has increased rapidly, taking many businesses by surprise (Curran and Eckhardt, 2020). Multinational Enterprises (MNEs), used to sourcing goods through global value chains (GVCs), often paid little attention to criticisms of their negative effects by Non-Governmental Organizations (NGOs) and Trade Unions. A certain confidence reigned that the overall gains from globalization were adequate to persuade governments, and most voters, that disrupting value chains was not in the broader interest (see e.g. Barrientos and Smith, 2007). Over a few short years, the context has changed significantly. Although increased skepticism had been brewing for some time (Rodrik 2018), the most significant shifts occurred in 2016 when the UK voted to leave the EU (so-called ‘Brexit’) and concerns about trade emerged as a key element in the US presidential election debate, with the final result being the victory of the most trade-skeptic candidate, Donald Trump. His subsequent imposition of new import tariffs, which clearly circumvented international rules and simultaneous undermining of the World Trade Organization (WTO) judicial process, posed serious threats to the modern trading system (Jean et al, 2018). In the meantime, in the UK, a no-deal Brexit remained the default option, in the absence of agreement (Proctor, 2019). Most recently, many countries banned or restricted trade in key products in response to the COVID-19 pandemic, a development which may further undermine the world trading system (Baldwin and Evenett 2020; Curran et al. 2021).

These events suggest that a new global economic order is emerging with national interests prioritized over multilateral cooperation. Many MNEs struggled to adapt to this new context. Overall, surveys of companies in the run-up to the recent protectionist backlash indicated that it took firms by surprise and that, even after the first indications of rising protectionism discussed above, companies did not consider it to be a top priority. In the Spring of 2017 only 18% of the finance providers surveyed by the International Chamber of Commerce were concerned about protectionism (ICC, 2017). By 2020, that figure had increased significantly to 82% (ICC, 2020).

Lack of company advocacy has been evident in the public debate. The voice of business was found to be relatively low key in the run-up to the Brexit referendum (Morgan, 2016), while in the EU few firms engaged actively in the intense debate on the proposed Trans-Atlantic Trade and Investment Partnership (TTIP) with the US (Bauer, 2016). US business was also rather inactive in weighing into the trade debate during the 2016 Presidential campaign. They only

mobilized in significant numbers when the Trump administration imposed extensive new tariffs. For example, over 350 companies attended the hearings on the proposed imposition of tariffs on China in August 2018, mostly to argue against the measures.¹

The literature on Corporate Political Activity (CPA) in defense of trade openness is relatively limited. Research has tended to focus on understanding how and why companies access the policy making process (Brook, 2005; Solis, 2013), especially when seeking to persuade governments to enact protectionist measures (Brook, 2005; Lindeque and McGuire, 2010; Kolk and Curran, 2017). Less attention has been paid to whether and how companies and their trade associations mobilize against such protectionist measures.

The recent trade policy context, where protectionist measures and threats rapidly emerged in several key markets, provides an opportunity to expand our understanding of CPA on trade policy. In this paper we explore corporate strategic responses to several protectionist threats observed over the period mid-2016 to 2019. We focus on those who have the most to lose: trade dependent firms (TDFs). In line with Curran and Eckhardt (2020), we define TDFs as firms whose business model relies on frictionless access to global markets or low cost/high variety imports, or both. We analyze how TDFs organize to address the backlash and especially what cooperative strategies they develop in this context, including through their trade associations (TAs). The role of the latter has been subject to relatively limited academic scrutiny (Lawton et al. 2018).

To explore these questions, we analyze four cases of trade policy threats over the period of study with differing characteristics: 1) the general anti-trade rhetoric during this period; 2) the threat posed by the US to the WTO; 3) the threat of tariffs between the UK and the EU due to Brexit; and 4) the US tariffs on steel and aluminum imposed in 2018 and the EU's retaliatory safeguards. We mobilize public lobbying data, interviews, analysis of business statements and media reports to explore a series of propositions based on the existing literature on CPA in the trade arena (Curran and Eckhardt, 2020). As highlighted by Butzbach et al. (2020), the nature of the anti-globalization backlash, as well as corporate responses, are impacted by institutional differences across different types of capitalism, thus, the empirical focus of the paper is on one institutional context – the EU.

¹ <https://ustr.gov/issue-areas/enforcement/section-301-investigations/record-section-301-investigation/section-301>

Although the widespread imposition of new tariffs to counter globalization is not (yet) on the political agenda in Europe, a focus on the response of EU TDFs to the globalization backlash is pertinent for several reasons. Firstly, populist parties in Europe have been growing in power and influence (Kinderman, 2020), most recently in the 2019 European Parliament elections, where, although gains were less extensive than projected, they emerged as a strong force in the new chamber (Walker, 2019). As a result, anti-trade rhetoric, although more widespread in the US during the period of study, also increased in Europe. In addition, shortages of key products during the COVID-19 pandemic fueled concerns about the EU's dependence on external suppliers, fostering a new debate on how to achieve 'Open Strategic Autonomy.' Some fear this could result in rising protectionism against non-EU suppliers (Eder, 2020).

Secondly, the result of the Brexit referendum sent shockwaves through EU industries. The reasons behind the vote for Brexit were rooted in a complex history (Boer et al. 2019) and not all those who voted for Brexit did so in rejection of global integration (Hobolt, 2016). However, the end result of the process – increased trade barriers and potentially extensive new tariffs in the event of a no-deal Brexit – will clearly reduce EU-UK trade integration. Indeed, former UK Chancellor, George Osborne, referred to leaving the single market as “the biggest single act of protectionism in the history of the [UK]” (Stone, 2017).

Thirdly, although there is hope that the new US administration will soften its stance (Williams, 2020), EU industries have been confronted with a major reorientation in the trade policy of a key partner – the US – whose (in)action undermined a key function of the WTO – its Dispute Settlement Body (DSB) – by blocking the nomination of judges to the Appellate Body (Jean et al, 2018). At the same time, EU steel and aluminum exporters were directly targeted by US trade protectionism, resulting in EU retaliation. In addition, threats to impose potentially punitive tariffs on EU car exports to the US have persisted over the period of study, increasing uncertainty in the industry (McGee, 2019). Finally, as discussed below, much of the work on corporate lobbying on trade policy has been undertaken in the US. We focus on the EU institutional context, where CPA strategies consist primarily of information and constituency building (Hillman and Hitt, 1999). We thereby seek to widen our understanding of global variations in such activity.

Development of propositions - theoretical strategic responses to the globalization backlash

Research on CPA in the trade policy arena gives little insight into preferred strategies when faced with potential new protectionist rhetoric and measures (Brook, 2005; Lawton et al, 2009; Lindeque and McGuire, 2010; Solis, 2013). The question of how companies seek to counteract protectionism has attracted much less interest than how they mobilize in favor of protectionism. This is partly because the mobilization of protectionist actors has been more intensive and high profile (Irwin, 2020). Those who lose from increased trade (import-competing firms) have historically had fewer difficulties overcoming collective action problems than those who benefit (i.e. TDFs) (Baggs and Brander 2006). This is typically attributed to that fact that the benefits of protectionism are highly concentrated, while its costs are diffuse. Although TDFs which benefit from trade and are disadvantaged by protectionism have become more numerous in recent years, they still tend to be mainly the largest and most productive firms. These are a numerical minority in any given economy compared to small, domestic firms, with little international activity and potentially a lot to lose from import-competition (Mayer and Ottaviano, 2008).

As highlighted in recent work by Curran and Eckhardt (2020), several questions emerge about the likely response of TDFs to protectionist threats from the limited existing literature exploring CPA by TDFs. The propositions which they develop are presented in slightly modified form in Figure 1. For reasons of methodology and space, in this paper we will focus on those highlighted in bold. Their paper includes a much more detailed review of the literature than is possible in this short text, where we focus on the key literature behind each proposition.

[Insert Figure 1 here]

A notable finding of the work on CPA in the trade policy arena is that political mobilization is most likely when firms face clear and present dangers to their business models (Curran and Eckhardt 2018). The recent context presented such threats and we would have expected TDFs to mobilize. A key question is whether CPA is collective or individual.

Much of the research which informs our understanding of collective/individual lobbying on trade policy, is based on data from the US and focuses on the financial incentives aspects of lobbying. One of the objectives of our research is to explore whether similar trends can be identified in the EU, where lobbying consists primarily of informational and constituency

building strategies (Hillman and Hitt, 1999; McGuire et al. 2012). Although EU lobbying on trade is often organized collectively through TAs, their role in CPA is relatively under researched (Lawton et al, 2018; Tucker, 2008), leaving many questions about when and how they are mobilized.

In the trade policy arena, Bombardini and Trebbi (2012) find that, in the US, trade CPA mobilization varies across industries, such that firms lobby together on trade policy issues in more competitive industries, while they tend to lobby alone in more differentiated industries. Furthermore, the integration of industries into GVCs and the level of intra-industry trade, impacts on the diversity of the firms within a given sector and affects how they lobby on trade (Gilligan, 1997; Madeira, 2016; Osgood, 2017). For example, Madeira (2016) considers that, as US production structures have become more fragmented, industry-wide coalitions have become more difficult to hold together. Thus, firms who are more integrated into the global economy break away from their more protectionist associations to mobilize individually.

In addition, the exclusivity of gains has an impact. That is, in a case where the protection or liberalization of a product threatens (or provides opportunities) to only one (or few) companies, they have an incentive to lobby individually (or in small ad-hoc groups) for protection/liberalization (Gilligan, 1997; Madeira, 2016; Osgood, 2017). However, in the case where generalized protectionism or liberalization benefits/hurts many companies, they have no incentive to mobilize individually and are more likely to rely on TAs (e.g. Madeira, 2016). In other words, in as much as free trade can be considered a ‘public good,’ the TDFs studied here would be expected to be less active in lobbying individually against general protectionism than their associations. This literature gives rise to the following propositions:

P1 - Where protectionist trade policy proposals will have economy wide effects, most TDFs will lobby collectively through their formal trade associations.

P2 - Where concrete protectionist trade policy proposals would have differential effects across an industry, TDFs will lobby the relevant government individually, or in ad-hoc groupings.

The threat of rising protectionism affects companies on both sides of any international trading relationship. Anti-protectionist lobbying efforts can be strengthened through transnational lobbying where industries/companies work together across borders on a key common interest. These techniques have become increasingly common in recent years as companies have

successfully cooperated transnationally to lobby for the launching of cases through the WTO dispute settlement mechanism (Curran and Eckhardt, 2017; Eckhardt and De Bièvre, 2015), the reduction of anti-dumping measures in the EU (Kolk and Curran, 2017) and the establishment of free trade agreements (Young, 2016). Given the global nature of the threat posed by the globalization backlash, such a transnational approach to CPA would seem pertinent, giving rise to the following proposition:

P3 - Where protectionist policies pose significant threats to the operations of TDFs across two or more effected countries, they will mobilize together to create transnational groupings to lobby their respective governments

In addition, lobbying against protectionism is often much more successful when broadly based, not only within and across industries but including wider stakeholders, through constituency building strategies (Hillman and Hitt, 1999). The potential of stakeholder mobilization to support firm level CPA has been recognized across a range of business activities. As Walker (2012: 587) notes: ‘Stakeholders... represent not merely a constraint but also an asset for firms in influencing their external environments.’ TDFs could cooperate with a range of stakeholders, including companies’ own employees, civil society (Destler et al. 1987; Walker and Rea, 2014; Saner 2019) and trade unions (Brook 2005). Coalitions with civil society in defense of openness can be very effective. For example, in the solar panel anti-dumping debate in the EU, environmental NGOs came out in support of the successful campaign against protection (Kolk and Curran, 2017). However, given that such coalitions are likely to be difficult and resource-intensive to create, companies are only likely to choose this option in the case of a major protectionist threat and clear common interests.

P4 - Where protectionist trade policy proposals pose major threats to their operations and risk societal or environmental externalities, TDFs will increase their engagement with civil society and grass roots organizations with a view to creating synergies, but also support for their global operations.

Exploring the propositions - Approach and methodology

Research design - This paper seeks to expand our understanding of CPA in the trade arena by exploring our propositions in the context of TDFs in Europe. The focus is on the period from the vote for Brexit in June 2016 to the end of 2019. This was a period where several key

mobilizing events occurred - increases in anti-trade rhetoric, but also increased protectionism. We explore our propositions through a selected series of case studies of these events, following the methodology for case study research described by Yin (2017). Case studies are increasingly mobilized in research on business strategy (Gibbert et al. 2008), where cross-case analysis can provide useful insights for theory building (Eisenhardt, 1989). We explore four cases of threats which have varying levels of relevance to our propositions. To explore variations in CPA – our units of analysis, explained in more detail below – across these threats, we mobilize public data on CPA, as well as interviews with representatives of different industrial sectors and policy makers.

Case selection – We chose to analyze 4 cases representing different types of threats. Although this is the minimum often quoted for a rigorous cross case comparison (in line with Eisenhardt, 1989), keeping the number of cases to a minimum enabled us to provide detailed data on each, while cross case analysis remained manageable. As noted by Piekkari et al (2009) multiple case studies often suffer from the inability to provide such a ‘rich story’. The criteria for case selection were, firstly that there was a clear interest for TDFs, in that they have a significant amount to lose and (occasionally win) depending on the outcome. In order to explore how strategies were affected by different types of threats, we sought to ensure variations in (a) the timescale of the threat (clear and present danger, or potential, more long-term) (b) the variance in interests across different sectors/companies and (c) the extent of common interests with transnational partners and/or civil society, in terms of economic, employment or environmental impacts.

The cases we chose were: firstly, the general anti-trade rhetoric which was widespread over the period; secondly the threat to the WTO from US inaction; thirdly, the threat of new tariffs between the UK and the EU as a result of Brexit; and, finally, the US Section 232 tariffs on steel and aluminum imposed in March 2018 and the EU’s retaliatory safeguards. Table 1 provides a summary of the variation across the cases in terms of their relevance to our propositions. For example, protectionist rhetoric was a threat to all TDFs, but did not affect one sector more than another, at least not at first. On the other hand, the Section 232 tariffs and the EU’s safeguards mainly affected steel and aluminum producers (a relatively concentrated group) and users (a much more diverse group).

Table 1 – Variation in key characteristics across cases					
Cases	Timescale	TDF interest	Variation in impact across sectors	Transnational interest	Civil Society interest
Protectionist Rhetoric	Continuous, but increasing over 2016-19	High - potential	Low	Yes	Low
Threat to WTO	December 2019 (DSB ceases to function)	Medium - potential	Low	Yes	Low
Brexit	First deadline March 2019. New deadline Jan 2021.	High - real	High	Yes	High
Steel and Aluminum Tariffs	March 2018 onwards	Medium - real	High	Yes	High

Source – Own elaboration

Data collection and units of analysis – The methodology of this paper was constrained by data availability. Unlike in the US, data on EU company lobbying is difficult to obtain. The quantitative analysis undertaken of the ‘financial incentives’ aspect of lobbying in the US (e.g. Bombardini and Trebbi, 2012; Gilligan, 1997; Madeira, 2016; Osgood, 2017) would therefore be very challenging in the EU context. We focus on the other two forms of lobbying identified by Hillman and Hitt (1999), that is, information and constituency building. We adopt a mixed methods approach, combining quantitative and qualitative data, a common means to triangulate findings (Piekkari et al. 2009).

Our quantitative data comes from the EU’s Transparency Register (TR),¹ where all lobbyists must register in order to be able to meet key EU decision-makers – a key aspect of informational

¹ <https://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en>

CPA. We analyzed the data provided by firms in the TR to get an indication of their activity on trade policy issues. In addition, we analyze meetings with high level officials in the European Commission, using a database collated from the TR by Integrity Watch². We analyzed all meetings on trade policy with the Juncker Commission (2014-2019), including those of the President and his cabinet, the head of the Brexit Task Force (TF50), Michel Barnier and senior DG Trade officials. We concentrated our analysis on the period since the Brexit referendum – 23rd June 2016 – although we also analyzed prior meetings for comparison.

To supplement this rather limited quantitative data, we also explore our propositions qualitatively, through interviews and analyses of public documents. In order to secure robust findings and widespread coverage, we triangulated several different data sources. The authors conducted twenty-six semi-structured interviews with representatives of generic trade associations, sectoral associations representing 80% of the EU's goods trade,² Trade Unions, and four European Commission officials, as well as an analyst from the Think Tank, ECIPE (see table A1 in annex for details of interviews, as well as the membership of the TAs). TAs included both those covering very concentrated sectors like steel (Eurofer) and 'peak associations' which covered all industrial sectors, like BE and Amcham. Several informants were interviewed at different points over the 2016-2020 period, enabling us to assess how strategies evolved in response to political changes.

The key objective of the interviews was to establish the extent to which corporate strategies identified in the theoretical and empirical literature were mobilized by EU TDFs in the context of the four threats we studied. All interviews were undertaken in English and transcribed directly, except with Euratex where they were in French and transcribed into English by the authors³. We questioned interviewees on their activities across our four units of analysis related to our propositions: their collective action; the action of individual companies in their sector; their transnational activity; and their cooperation with civil society.

² We are grateful to Integrity Watch for facilitating this analysis by providing us with the raw data from their on-line database at: <https://www.integritywatch.eu>

² Interviews were conducted with trade associations representing all EU industry, US industry in Europe and EU importers. The sectoral trade associations interviewed (machinery, automobiles, chemicals, pharmaceuticals, clothing and textiles) represent over 80% of the EU's non-energy trade. The latter was calculated on the basis of average imports and exports in dollars over the 2015-8 period, excluding HS 27 – oil and gas, which has a very particular supply and demand structure, as well as large variations in prices.

³ In line with many IB researchers, we considered that the use of the interviewee's native language created a better rapport and enabled them to express themselves more easily (Welch and Piekkari, 2006).

Analytical approach - The responses to our interview questions and all public press releases or statements by the organizations interviewed were analyzed and the key strategies described were hand-coded thematically (Saldaña 2015). The codebook is provided in annex in Table A2. We coded the CPA reported by our informants and their public statements, first of all, by the nature of the action: collective [COLL], cooperation between TAs [COLL +], individual [IND], transnational cooperation [TRANS] and that with civil society [CS]). In terms of the distinction between COLL and COLL+, in analyzing our data, we noted that there were two types of collective action – that within a given TA, which is part of their normal operations [COLL] and cooperative action between two or more TAs, with common interests. We coded the latter as COLL+, as it is both organizationally different to single TA action and more challenging to engineer, thus indicative of higher levels of concern. We also coded the objective of the CPA according to the specific threats (cases) addressed by the action and noted perceived inaction. Finally, we coded the perceptions of our interviewees of the reasons behind actions and inaction. As all TAs interviewed were based in Brussels, their primary lobbying targets were the European Commission and the Parliament.

Research findings

The context of CPA on trade policy over the period of study - Findings from the EU Transparency Register (TR)

In order to set the context for our study, we analyzed publicly available data on lobbying activity. Data extracted from the TR in October 2019 on firms' priority areas of interest, suggested that trade was not a major concern for most EU companies. Of the over 2,400 individual firms which were registered in the database at that time, a search for those which noted 'trade' as a policy interest turned up 723 results. However, many simply included 'trade' in an exhaustive list of policy areas. A manual search through the policies which firms actively followed, turned up 284 firms. Thus under 12% of individual companies which lobby the EU report actively addressing trade policy in their work. TDFs which noted trade as a policy interest but did not note any trade issues in the key EU initiatives they followed, included Amazon and IKEA.

However, our analysis of meetings with high level officials in the European Commission, provided a more nuanced picture. Individual firms were actually quite active in meeting Commission officials in DG Trade and the Brexit Task Force (TF50) over the period. Table 2

provides an overview of the extent to which the threats which we study here were reported to be addressed in meetings. Unfortunately, most trade related meetings list vague subjects like ‘key issues for trade policy’ or ‘trade priorities.’ However, some are more detailed. It is these that we analyzed, coding them by subject, depending on the declared theme of the meeting and the company/other entity. Meetings with TF50 did not detail the exact subject, but we assumed that if discussions were Brexit-related there was a trade policy element in the discussion.

It is notable that, as confirmed by our interview data, the president’s cabinet received very few trade-related visitors. Most such meetings were with DG Trade, with the exception of Brexit meetings, which were mainly with TF50. Overall, the figures indicate that, while individual firms were less active than their TAs, they nevertheless had over 200 trade-related meetings with the Commission between June 2016 and November 2019. The key subjects discussed were relations with the US and the 232 tariffs (16% of meetings, plus 4% which discussed the EU’s safeguards) and Brexit (13%). China also featured quite prominently (8%). TAs tended to focus on similar issues – 18%, 15% and 6% of meetings respectively. Comparison with meetings prior to Brexit/Trump indicate that the US also loomed large, but mainly in the context of the TTIP negotiations (20% of firm meetings and 29% of TAs). China was a bigger concern for TAs in that period, with 18% of meetings addressing bilateral trade relations (only 5% of firms).

The extent to which meetings post-Brexit covered general protectionism, or the threat to WTO, was minimal. The company which mentioned the WTO most often (16 times in the 22 meetings they had over the period) was Airbus. Over the period the company was the subject of a US-led dispute in WTO related to alleged state aid and stood to lose significantly from a negative judgement. It seems unlikely, therefore, that the meetings were concerned with the fragility of the DSB and indeed we did not code them as such.

Overall, these data indicate that the more generic threats (protectionist rhetoric and WTO) were not considered priority by either companies or TAs. When they met the Commission, it was generally at a working level, to discuss specific threats to their business (steel tariffs/retaliation and Brexit). The representatives of civil society mainly requested meetings on Brexit. The other threats we study were largely absent from the themes evoked, indicating a lack of concern on general protectionism or even specific threats like US steel tariffs.

Table 2 - Trade and Brexit related meetings Juncker Commission (post Brexit vote)							
	Nb. mtgs	Protectionism	Brexit	China	WTO	US-Tariffs	EU safeguards
Companies and groups	207	3	27	16	5	33	8
Trade and business associations	327	1	49	21	12	58	18
NGOs	81	1	23	0	2	1	0
Professional consultancies and law firms	62	0	4	0	1	5	1
Think tanks, research institutions, universities	45	0	32	0	0	2	0
Trade unions and professional associations	28	0	19	0	0	0	0
Total	750	5	154	37	20	99	27

Source – Transparency Register, Integrity Watch and own analysis

Findings from interviews and public statements

In this section, we highlight our findings from interviews and public statements/press releases on our four propositions in relation to each of our case studies. The detailed data is too extensive to report here but, in the interests of transparency and replication (Gibbert et al, 2008), we provide our main findings in tables in the on-line annex, where key interview findings are reported chronologically (Tables A3-A6).

Case 1 – general anti-globalization rhetoric

We questioned all our interviewees on their actions/inactions and perceptions on the general protectionist threats and rhetoric which were common over the period. Our key findings are presented in detail in Table A3 in the annex. Although most of our interviewees indicated that their organization was against protectionism and for open trade, the actions which had been taken on this issue were limited. In terms of public statements, amfori underlined its overall stance against protectionism in a statement on Brexit in March 2017; issued a statement when Trump was elected; and sponsored an interview of their DG defending trade with the influential publication Politico. Business Europe (BE) was part of the B20 and B7 group of businesses which issued statements in parallel to G20 and G7 meetings supporting trade openness. Finally, CEFIC's trade director wrote a strong defense of trade in a blog on their website in mid-2019

(Van Sloten, 2019). Overall, however action on this threat was ‘under the radar’ partly because of the difficulty in engaging with the US administration (BE, ACEA).

Individual company action on protectionism was reported to be very limited. This created quite a lot of frustration. Although most TAs concurred with EFPIA that collective action ‘*is what they [their members] pay us for*’ (Author interview, January 2020), they also noted that such action was less effective when individual companies did not actively support it. They conceded that part of the reason was that there were differences within their membership, although many members were also too small to have CPA capacity. However, there was a perception that companies either didn’t take the protectionist threat seriously or considered that it would not create a competitive disadvantage for their business.

Finally, several interviewees felt that lack of engagement was partly due to fear. Corporate reputational damage has been identified as a risk for CPA on highly salient issues (Bonardi and Keim, 2005) and there was a perception that trade had become such an issue. As confirmed by research (Bauer, 2016), the debate on TTIP was considered to have created a very toxic image around trade liberalization in the EU and several informants felt that this made companies loathe to talk out publicly. This is consistent with the concept, highlighted by Tucker (2008), of TAs providing a ‘buffer zone’ on controversial issues. TAs worked at Committee level with member companies, but their public stance was taken in their own name. Amcham reported that their members occasionally talked at key events and attended the annual meeting with MEPs in high numbers. However, such meetings are mainly attended by trade-friendly audiences.

In terms of transnational action, several sectors (CEFIC, EFPIA, amfori) report working well with their partners in the US and elsewhere to try to promote trade and dialogue. Amcham and BE worked extensively with their US partners, organizing events and seeking to influence government and public thinking, although there was a lot of frustration at the lack of receptivity. As a former EU official remarked ‘*The White House was pretty impervious to arguments*’ (Author interview, June 2020). Most sectors reported that they had worked well with their US counterparts on TTIP (see also Young 2016), although contacts fell after it was shelved. In case of need, these relationships were quickly rekindled. Such as when CEFIC was asked to make some propositions for the revived US-EU talks. Most TAs reported relying on their US partners to pass messages to the US administration. As ACEA remarked: ‘*If the US listens, it’s to their own industry*’ (Author interview, July 2019)

Finally, little common activity was reported with civil society. Although most TAs could see an interest in such constituency building and would like to cooperate more widely to counter

protectionism, they perceived distrust towards them in civil society. Prior common actions had been ‘*a learning experience*’ (Author interview, December 2018). The NGO we interviewed confirmed distrust, but also a willingness to engage with the right type of companies. Common action and dialogue with Trade Unions were both more institutionalized and more extensive. The Unions confirmed that they cooperated with business when interests converged and that their approach to trade had evolved positively.

Case 2 – Threat to the WTO

In table A4 in the annex we summarize our findings regarding the threat to the WTO. Our interviews and analysis of public statements reveal that the threat to the WTO from the US was a key concern. The WTO’s importance to MNEs has grown significantly in recent decades (Lawton et al. 2009). Officials, TAs and even the Trade Unions we interviewed, expressed concern that the Trump administration could be an existential threat to an institution they saw as a key bulwark against protectionism. In terms of public statements, since 2017, BE underlined the importance of the WTO in reports and press releases and put forward reform proposals. Amfori, Amcham and Orgalime also publicly underlined their fears about the WTO in press releases, while in 2019, the latter, together with other TAs including ACEA, CEFIC, EURATEX and EUROFER, published a report on the future of EU industrial policy, in which the need to defend the WTO was mentioned multiple times (Industry4Europe, 2019). In the aforementioned CEFIC blogpost, the threat to the WTO was a key concern (Van Sloten, 2019).

Although TAs have been active in the WTO debate throughout the period, there was little engagement by individual companies. Our interviewees linked this to the observation highlighted above, that companies did not take the protectionist threat very seriously. However, the threat was also considered to be rather intangible for companies. Several interviewees, including Amcham and the former EU Embassy official, noted that ‘*not many firms have a good understanding of how it works in the WTO*’ (Author interview, November 2019) and that ‘*It’s too far away and too abstract*’ (Author interview, June 2020).

In terms of transnational action, BE issued press releases with the B20 underlining their common concern about the WTO. In our interviews, they also confirmed that they sought to cooperate with US TAs on this issue, but that this had been made difficult by the latter’s internal divisions. Another interviewee suggested that this may be because ‘*Quite a number of [US] companies share [Trump’s] skepticism about the WTO appellate body*’ (Author interview, June 2020). In 2017, amfori made a joint statement with 14 other associations representing retailers and other TDFs from Asia and North America calling for progress in WTO and the preservation

of the DSB (Amfori et al, 2017). More recently, ACEA made a joint statement with their US, Japanese and Korean counterparts, “*to express their concerns about the impending blockage of the decision-making process in the [WTO] appellate body structure*” (ACEA et al. 2019a). Finally, none of our interviewees mentioned any activity with civil society in relation to the threat to the WTO and we did not find any joint statements on the issue.

Case 3 – Brexit

Our findings from interviews and public statements on Brexit can be found in Table A5 in annex. Prior research has found that the business community was rather low profile during the referendum debate (Morgan, 2016). Our findings indicate that TAs were also not very active during the first 18 months after the vote. Although all the associations we interviewed quickly understood the potential threat from the re-imposition of tariffs and changes in the regulatory environment, the public statements we analyzed indicated that it was not until 2018, when a no-deal Brexit became a real possibility, that they stepped up their political efforts. BE issued many press releases on the subject, particularly as the first deadline loomed. They also collaborated with 12 sectoral TAs on a joint statement warning of the consequences of a no-deal Brexit (CEFIC et al, 2019). On the sectoral level ACEA was also very active and issued many press releases underlining how negative the impacts of Brexit would be for the auto sector. In several actions they cooperated with the European Association of Automotive Suppliers (CLEPA) and national UK associations, thus the whole supply chain of the automotive industry spoke together against Brexit (ACEA et al 2019b). Similar efforts were made in the healthcare sector, where the main association – EFPIA – allied with a range of sub-sectoral associations to highlight threats (EPFIA et al. 2017)

In terms of action by individual companies we found that, even on Brexit, which was a very clear and imminent threat, companies were slow to mobilize. In late 2017, Euratex noted a continued lack of feedback from companies, while other interviewees also mentioned relatively little engagement from individual firms. Some perceived this to be because many, in particular SMEs, were unaware of the threat Brexit could pose. Others suggested that companies were reluctant to talk out because of the polarization of UK politics and fear of being boycotted by customers (Author interview, June 2020). This is consistent with the literature on reputational risk related to CPA on salient issues (Bonardi and Keim, 2005). However, from mid-2018 onwards, several large EU companies, including Airbus and BMW, did start to take a public stand against a “hard Brexit” (BBC, 2018). BE sought to highlight the effects on SMEs by

issuing a report in 2017 on the negative impacts of a ‘hard’ Brexit on 11 anonymized companies (Business Europe, 2017).

We did not find evidence of large-scale transnational activity beyond the current EU, although Amcham reported working with Japanese industry on a common position on post-Brexit customs (Author interview, November 2019). All of the TAs interviewed were actively working with their UK equivalents to lobby their respective authorities to ensure that the disruption from the transition was as limited as possible (e.g. CEFIC and CIA, 2019; EFPIA et al, 2017). Such transnational collaboration was entirely natural, as UK associations are members of these EU associations and indeed were likely to remain so after Brexit.

In contrast to all other cases studied, constituency building with civil society organizations on Brexit was extensive. Business worked together with the labor movement on several joint statements to highlight the danger that a no-deal Brexit posed to jobs (Business Europe, 2018; CBI & TUC, 2019). Other NGOs cooperated with business on specific Brexit-related threats: shortage of medicines and the environmental risks of exiting the EU’s REACH chemicals management system. On the former issue, a coalition of TAs and patient NGOs cooperated throughout the process, presenting a common front to governments (EFPIA et al, 2017). EFPIA underlined that, although patients’ representatives and industry did not always agree, they clearly saw the interest of working together on Brexit (Author interview, January 2020). On REACH, EU and UK industry have worked with the European Environmental Bureau, an umbrella body of 150 Environmental NGOs. They noted their common concerns in an open letter (CEFIC et al, 2018).

Case 4 – Steel and Aluminum tariffs

The main findings from interviews which addressed the US tariffs on steel and aluminum and the EU’s safeguards are reported in table A6 in annex. A lot of collective action was reported, which is consistent with the meetings reported in the TR reported in Table 2. Although Amcham came out strongly against the US tariffs, much of the collective action in the EU was against the safeguard measures that the EU instigated to avoid trade deflection. Eurofer was very active in pushing for these safeguards. Their information strategy was intensive. The Commission President’s cabinet reported that they visited many times (a fact confirmed by the TR), although their key concern was usually Chinese competition.

The EU’s safeguards were directly against the interest of steel users’ (cars, machinery). Their associations reported being very active, both collectively and individually, arguing against the

safeguards (confirmed in Table 2). BE reported that it was more difficult for them to get overall consensus, given the varied interest of their membership, thus they made few public statements after the US imposed tariffs. However, they reported consistently arguing privately with policy makers against both the US tariffs and EU retaliation. Although the TAs reported little individual company action, as we see from Table 2, there were 33 Commission meetings with companies related to the tariffs, more than on any other issue over the period.

In terms of transnational action, BE reported that divisions within US industry made cooperation difficult. However, once tariffs were actually imposed, their US partners became more active. In late 2017, they also reported that European companies were trying to establish contacts in the US administration to influence the outcome. The former senior EU Embassy official perceived more action by US firms dependent on EU imports than by EU firms themselves. Having condemned the tariffs, Amcham subsequently focused more on pushing a positive transatlantic agenda than seeking to roll them back.

Several interviewees considered that transnational action by EU companies in the US would not have achieved much. Eurofer remarked: *'What's the point? We do not go for these games'* (Author interview, November 2019). Following tariffs, the latter did not seek to create cross-regional coalitions against them, partly as they thought their most likely ally would be Chinese industry, which was not a credible option. Indeed, the only international coalitions they reported creating recently were against Chinese overcapacity. For example, they signed a joint letter on China's steel reforms with eight national and regional trade associations from Europe, North and South America in April 2015 (Eurofer et al, 2015).

In terms of civil society, the Trade Union interviewed indicated that they did not support the US tariffs, or protectionism in general. Their key concern was overcapacity, especially in China and they cooperated with industry against this, including through public demonstrations. Nevertheless, in a statement on their website in 2018, they underlined that workers were concerned about the US' unilateral action (IndustriAll, 2018). Both they and other interviewees like ACEA considered US Trade Unions to be more protectionist and thus unlikely to cooperate.

Cross Case comparison

In this paper we have sought to explore four propositions which emerge from the literature on likely CPA activity by TDFs in response to recent trade protectionism. In this section we draw on findings from our case studies to highlight the core conclusions which emerge from our cross-case comparison. Table 3 provides an overview and summarizes the key findings from

the cases discussed above. We have differentiated between cases where our different units of analysis were observed, as well as those where they were not and the justifications provided.

Table 3 - Summary of key findings on nature of CPA and justification

	Rhetoric		WTO		Brexit		Steel tariffs and safeguards	
Trade Associations	Action/inaction	Justification	Action/inaction	Justification	Action/inaction	Justification	Action/inaction	Justification
Amcham	COLL; COLL+; IND; TRANS; CS.		COLL, TRANS	Interests	IND; COLL+; TRANS	Interests	COLL; TRANS	Interests
<i>Inaction</i>	<i>No IND; No CS</i>	<i>Awareness; Reputation.</i>	<i>NO IND</i>	<i>Awareness</i>				
ACEA	COLL; TRANS		COLL+	Interests	COLL; COLL+	Interests	COLL+;	Interests
<i>Inaction</i>		<i>Ineffectiveness</i>					<i>No TRANS</i>	<i>Ineffectiveness</i>
Amfori	COLL;	Interests	COLL, TRANS		COLL	Interests	no	
<i>Inaction</i>	<i>No CS; No IND</i>	<i>Split Interests; Awareness; Reputation</i>						
Business Europe	COLL; TRANS; CS	Interests	COLL, TRANS		COLL; COLL+; IND		COLL; IND; TRANS	Interests
<i>Inaction</i>	<i>no IND; No CS</i>	<i>Awareness; Ineffectiveness; Split Interests; Reputation</i>	<i>No TRANS</i>	<i>split interests</i>			<i>No TRANS</i>	<i>Split Interests</i>
CEFIC	COLL, TRANS		COLL		COLL; COLL+; TRANS; CS	Interests	no	
<i>Inaction</i>	<i>no IND</i>	<i>Awareness; Ineffectiveness</i>	<i>No Ind</i>	<i>Awareness;</i>	<i>No IND</i>	<i>Awareness.</i>		
EPFIA	COLL; IND; CS; TRANS	Interests	no		COLL; COLL+; TRANS; CS.		no	
EURATEX	COLL	Interests	no		COLL; COLL+; TRANS.	Interests;	no	

<i>Inaction</i>	<i>No IND</i>	<i>Split Interests; Awareness.</i>		<i>No IND</i>	<i>Awareness</i>			
Eurofer	COLL; IND; CS		COLL	COLL+	Interests	COLL	Interests	
<i>Inaction</i>						<i>No TRANS</i>	<i>Ineffectiveness</i>	
Orgalime	COLL	Interests	COLL	no		COLL; COLL+	Interests	
Other								
CEC	COLL;		COLL;	COLL; TRANS	Interests	COLL; IND; TRANS	Interests	
<i>Inaction</i>	<i>No IND</i>	<i>Awareness; Reputation; Ineffectiveness</i>	<i>NO IND</i>	<i>Awareness; Split interests</i>	<i>No IND</i>	<i>Reputation; Awareness</i>	<i>No TRANS</i>	<i>Ineffectiveness</i>
ECCJ	no		no	no		no		
ETUC	no		no	COLL	Interests	no		
<i>IndustriAll</i>	<i>no</i>	<i>Split interests</i>	<i>no</i>	<i>no</i>		<i>COLL</i>	<i>Split Interests</i>	
<i>ECIPE</i>	<i>No IND</i>	<i>Split interests; Reputation; Awareness</i>						

Source – Author interviews and own analysis

In relation to proposition 1 and 2 on collective (COLL/COLL+) and individual (IND) action, we find EU lobbying on protectionism has been far stronger at TA than at firm level. Although individual companies were active behind the scenes, meeting the Commission on issues of key interest (steel tariffs and Brexit), few have responded to the general rise in trade protectionism by taking clear public positions in support of trade or the WTO. TAs have been far more aware and mobilized, both on the general rise in protectionism and the threat to WTO, as well as the specific threats of Brexit and metal tariffs. Joint TA action was visible across the cases, but as evident in Table 3, the most intense cross-sectoral lobbying activity (COLL+) was seen in relation to Brexit.

It is significant that the TAs interviewed for this paper were overwhelmingly pro-trade and did not report extensive disagreement within their membership. Such discord might have been expected, given the high level of firm heterogeneity across the EU. Generic TAs, while they acknowledged internal debates within their diverse membership, consistently argued against protectionism. Thus, our research did not find support in the EU for the proposition emerging from research in the US (Gilligan, 1997; Madeira, 2016; Osgood, 2017), that involvement in GVCs has split industry interests, undermining their capacity to present a common front and forcing individual companies to become active. In as much as there was heterogeneity in the stance of EU industry, it manifested itself more in inter-sectoral, than intra-sectoral differences. In particular, while the steel sector focused on securing EU safeguards following US tariffs, steel-importing sectors created extensive cross-sectoral coalitions against this (ACEA et al. 2018). This is not a new phenomenon: import-competing and trade dependent industries have long argued over the optimal level of trade protection (Kolk and Curran, 2017; Eckhardt, 2013).

The lack of individual action by EU TDFs was a concern for several interviewees from both the policy making and advocacy communities, who felt that the lack of clear responses to protectionism at firm level undermined the effectiveness of collective lobbying. The key reasons proposed for inaction were lack of awareness, reputation and the perceived ineffectiveness of lobbying for trade, especially in the US. In as much as we found evidence of company action it was in the context of the immediate and specific threats from US tariffs and Brexit, where both individual companies and TAs were active in lobbying the Commission.

In relation to our proposition 3, on transnational mobilization (TRANS), we found extensive evidence of cooperation with UK businesses in reaction to Brexit, as well as efforts to mobilize with US industry against general rhetoric, the threat to the WTO and metal tariffs. The former was based on long-standing partnership and was very widespread. The latter was more difficult,

although Amcham, by nature of its membership, reported quite a lot of activity and other TAs continued to work with their US partners, although largely ‘under the radar.’ The reason for this low-profile approach was related to the perceived ineffectiveness of lobbying abroad, especially with the Trump Administration. In addition, some TAs worked together with partner associations in both the US and other world regions to highlight the threat to the WTO (amfori et al, 2017; ACEA et al, 2019a). Overall, most transnational action exploited existing partnerships and related to clear and present threats.

Finally, proposition 4 suggested the leveraging of linkages with civil society against protectionism through constituency building (CS). In spite of the potential advantages highlighted in the literature (Destler et al. 1987; Walker and Rea, 2014), our research found limited evidence of such strategies across three of our cases. The exception was Brexit, where Trade Unions were very active lobbying against a no-deal outcome and NGOs representing patient and environmental interests allied with TAs to highlight specific Brexit-related threats. In terms of wider protectionism, although both industry and NGOs’ saw the case for working together to mitigate its impacts on workers or consumers, both sides also recognize the challenge of combining their different agendas. From a public policy point of view, if such cooperative action is to be encouraged, funding for joint projects may be necessary.

Conclusions, limitations and future research avenues

Overall, our analysis of four different cases of trade protectionism highlights that companies and their TAs react differently to potential threats, depending on the likely impacts on their business, especially compared to competitors. Active engagement was particularly notable when threats represented a clear and present danger (Brexit, steel tariffs), or would have differential effects across sectors (EU retaliation). Transnational action was found to be most intense and public in the case of Brexit. Clearly long-standing institutional links facilitate TA cooperation, as was also evident in the TTIP negotiations (Young 2016). European transnational CPA was not high profile in the US over the period of study, as it was perceived that the administration was not open to the voices of foreign industry. In terms of cooperation with civil society, such activity was mainly evident in the case of Brexit – where the scale of the threat and the breadth of its economic impact facilitated coalitions between TAs, organized labor and environmental NGOs.

There are several important limitations in our research approach. Firstly, we seek to shed light on firm strategies by interviewing TAs, rather than individual companies. Initially we tried to interview companies recommended by the TAs, but they all declined to be interviewed, either

for lack of time or because protectionism was not an issue of concern. At that stage, we shifted our primary interview focus to TAs. This approach enabled us to shed light on the activities of these important CPA actors, which have attracted surprisingly limited academic attention (Tucker, 2008; Lawton et al. 2018). Our research confirms the important role of TAs in creating buffer zones on salient issues where firms face reputational risks from speaking out (Tucker, 2008; Bonardi and Keim, 2005).

Secondly, the difficulty in studying ‘inaction’. We note a lack of strong and widespread company mobilization against protectionist threats yet understanding the reasons for inaction is far harder than understanding those for action. Many of our interviewees provided well-informed and quite consistent insights into the reasons behind this failure to engage. Some attributed this to the ‘toxic’ public debate on TTIP, others to the perception that only discriminatory protectionism would really mobilize firms. However, these remain secondary perceptions and indeed several were puzzled by the inaction of their member companies. As one respondent from Euratex remarked on the lack of company engagement on Brexit: *‘Nothing. No one moves. To me it’s a bit of a mystery’* (Author Interview, December 2017).

It could be that the threat from protectionism was not yet real and pressing enough in the period of study to motivate many individual EU companies to engage in CPA or support academic work on the issue. Now that protectionism has become a more widespread element of the global economic landscape and has touched a larger number of GVCs, we may witness more individual action. Indeed, some TAs reported a slight increase in action over time. It may prove easier to motivate companies to engage in future research on this issue.

The need for such in-depth work on corporate and collective responses to protectionism is a key avenue for future research which emerges from our work. In the current context, where the COVID-19 pandemic has fostered extensive trade policy interventions to protect local industry and supplies (Baldwin and Evenett, 2020; Curran et al. 2021), the threat of protectionism remains very real. There is an urgent need for greater understanding of how companies and their associations are reacting to this threat, as well as the relative effectiveness of different potential strategies. Ideally such research would look at the CPA of companies facing anti-globalization threats through interviews and/or surveys which explore different industries, home countries and types of trade dependence. We hope that, by mobilizing cross case comparisons on CPA on this issue in the EU context, this paper can lay the foundations for future work.

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Annex

Table A1 Interviews undertaken for the project			
Organization	Members	Position	Date
<i>Trade Associations</i>			
Amfori (formerly the Foreign Trade Association (FTA)) – representing key EU importers.	2,400 members, 66% are importers, 26% import general merchandise and 22% clothing. 90% from Europe.	Responsible for trade policy	19/12/16, 8/11/17, 12/12/18, 5/11/19
Euratex – (textile and clothing sectors)	National trade associations from 18 European countries.	Responsible for Trade Policy Brexit Task Force chair	19/12/16 and 12/12/17 (In French) 22/12/17 (In French)
BusinessEurope - key generic business association	40 national employers' associations.	Responsible for trade policy	8/11/17, 12/12/17, 29/06/18, 15/11/19
Amcham (American business in Europe)	Over 160 US companies in Europe.	Responsible for trade policy and adviser	12/12/18 and 15/11/19
ACEA (Automobiles)	16 auto manufacturers operating in Europe	Trade policy advisor	15/7/19

Orgalime (Mechanical, electronic and electrical engineering industries).	48 trade associations from 22 European countries.	Responsible for Trade Policy	30/11/17
CEFIC (Chemical industry)	670 members including companies and trade associations.	Responsible for trade policy	13/11/19
Eurofer (Steel industry)	35 steel producers and 15 national trade associations	Responsible for trade policy	20/11/19
EFPIA (Pharmaceuticals)	36 national associations, 39 large pharmaceutical companies and 12 SMEs.	Responsible for trade policy	13/01/20
<i>Policy makers/think tanks</i>			
European Commission (DG Trade)		Market Access Specialist	8/11/17
European Commission (DG Trade)		Trade analyst	8/11/17
European Commission (President's Cabinet)		Responsible for trade	15/11/19
European Commission and EEAS (Retired)		Former EEAS and EU Embassy in Washington.	11/06/20

ECIPE	Funded by private foundations and corporations.	Trade Analyst	13/11/17
<i>Civil Society</i>			
European Coalition for Corporate Justice (ECCJ)	11 national platforms, 6 national organizations, 2 European and 1 international NGOs.	Coordinator	4/7/18
IndustriALL	Trade Union representing 50m workers in mining, energy and manufacturing in 140 countries.	Senior Policy Adviser	10/12/18
ETUC	90 national TU organizations in 38 countries and 10 European TUs.	Trade policy adviser	12/12/18

Table A2 - Codebook used to analyze interviews and public statements

Units of analysis	Definition	Indicators from interviews or public documents related to the case	Examples
Collective action [COLL]	Corporate political activity organized by trade associations, with a view to highlighting positive or negative effects of potential trade policy options (Bombardini and Trebbi, 2012).	Press releases with specific reference to the case; Seminars or conference speeches referring to the case; meetings with Commission or MS or MEPs in relation to the case; letters to the Commission or MS referring to the case	Letter by Business Europe to US secretary of Commerce. PRs on Brexit, or steel safeguards by individual TAs.
Collective action across sectors [COLL+]	Cooperative corporate political activity organized by two or more European trade associations, with a view to highlighting positive or negative effects of potential trade policy options.	Joint press releases/reports with specific reference to the case; Joint seminars or conferences on the case; joint meetings with Commission or MS or MEPs in relation to the case; joint letters to the Commission or MS referring to the case.	Joint press releases by TAs on Brexit; Joint press releases by steel users' TAs against EU safeguards.

Individual action [IND]	Corporate political activity by individual companies, together or separately, with a view to highlighting positive or negative effects of potential trade policy options (Bombardini and Trebbi, 2012)	Press releases with specific reference to the case; Seminars or conference speeches referring to the case; meetings with Commission or MS or MEPs in relation to the case; publicly communicated individual letters to the Commission or MS referring to the case	BMW/Nissan/Airbus statements on Brexit. Individual steel users/steel makers lobbying Commission on safeguards.
Transnational action [TRANS]	Corporate political activity with non-EU partners outside the EU by EU companies and/or trade associations, with a view to highlighting positive or negative effects of potential trade policy options (Eckhardt and de Bievre, 2015).	Joint press releases with specific reference to the case; Joint seminars or conferences referring to the case; joint meetings with government officials in other world regions in relation to the case; signature of joint statements or letters to specific governments and/or governmental organizations referring to the case.	Joint press releases/letters (especially B20) to the G20. Business Europe cooperation with US TAs on rhetoric and WTO.
Civil Society cooperation [CS]	Cooperative political action jointly undertaken with Trade Unions and other	Joint press releases with specific reference to the case; joint organization of seminars or conferences referring to the case; joint	EFPIA and patient's organizations and CEFIC and Environmental NGOs joint statements on Brexit.

	NGOs with a view to highlighting positive or negative effects of potential trade policy options (Walker and Rea, 2014).	meetings with government officials in relation to the case; joint signature of open letters or letters to specific governments and/or governmental organizations referring to the case	
Perceived reasons behind action/inaction			
Common interests	Clear concerns about potential impact of trade policy shifts on corporate interests	Potential economic impacts, impacts on supply chains, creation of barriers to trade, undermining of established business models.	Concerns in steel users about negative impacts of steel safeguards on their costs; concerns about impact of Brexit on supply chains (ACEA) and regulation (EFPIA and CEFIC).
Split interests	Differences in potential impact of trade policy shifts across industry/membership	Failure to establish a common position because of variances in sectoral/company effects	Differences across BE membership on EU steel safeguards. US industrial divisions on tariffs undermining collective action.
Reputation	Concerns about negative effects on corporate reputation of companies spoke out in favor of trade	Individual companies unwilling to make public statements; Perception of trade as 'toxic'	Lack of public statements on Brexit and against the US tariffs.

Lack of awareness	Perception that companies were not aware of potential impacts of the threat.	Perceived dissonance between TA perception of the threat and that of their corporate members. Perceived complacency on potential threats.	Concern about ineffectiveness of TA messages in absence of companies. Reported lack of awareness, especially amongst smaller companies (Eurotex, Amfori)
Ineffectiveness	Inaction due to perception that positions are fixed, or target government does not listen to them.	EU companies' inaction in Brexit and US trade debates.	BE operating 'under the radar' in US. CEC reports EU companies relied on US clients to put their position to the administration.

Figure 1 – CPA responses to protectionism which emerge from the literature (Adapted from Curran and Eckhardt (2020)).

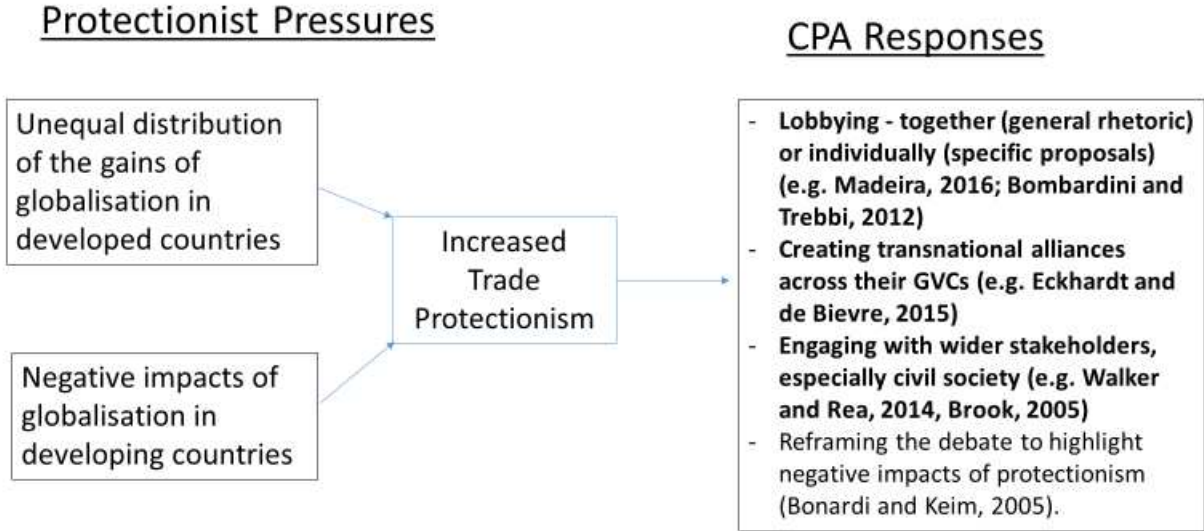


Figure 1 – Proposed CPA strategic responses of TDFs to the globalisation backlash

Adapted from Curran and Eckhardt (2020).

On-Line ANNEX

Table A3- Findings on general anti trade rhetoric				
Interview subject	Date	Category	Interview Findings	Press releases/public statements
Amfori	Dec 2016	Action	Mainly lobby on imports.' [COLL] They participate in civil society dialogue on trade, but CS not cooperative. [no CS] Always hard to get members engaged on trade, especially SMEs.[no IND]	Issued a statement when was Trump elected calling on him to take note of the int trading system etc. [COLL]
		Perception/ justification	'very worrying, even in Europe, that the main beneficiaries of trade, the countries, are becoming the most trade-skeptic - Germany...' Very worried also about a trade war with China. 'But big differences in individual positions of members 'Always lowest common denominator'. 'We had some of our members, the SMEs, wanting us to take a very anti-TTIP stance...' even though it was in their interests. Why? 'because of the media I think', [Split Interests] 'I think the trade sector is losing the battle for the hearts and minds, in and around the developed world...' In civil society dialogue: '95% of the people presented there, are representing interests that are anti-trade' [no CS]. On TTIP: 'they are anti-America rather than being for or against trade.' 'We tend to be viewed as representing foreign interests' [Split Interests].	
EURATEX	Dec 2016	Action	Until a month ago [TTIP] took up half my time.' Work together with Commission: 'We have very good cooperation [with experts in DG trade]' [COLL]	
		Perception/ justification	the evolution of the industry from defensive to offensive [on export] is linked to changes in GVCs. BUT there are internal tensions: 'We don't have the same industry in Italy as in Germany... Eastern Europe has become more important.' [Split Interests]	
Amfori	Nov 2017	Action	Still very little action from members [no IND]. Not working together with civil society [no CS]	Statement on Brexit includes the indication: 'FTA will remain an active advocate... against the current protectionist trends gaining ground in Europe and

				abroad.' '(March 2017) [COLL]
		Perception/ justification	'Companies are not yet taking seriously the rhetoric in the US.' [Awareness]'They are scared of the reputational damage of being Free Trade.' [Reputation] Complacency is an issue... 'only a big event that only affects the EU' will mobilize companies [Awareness] They don't speak out over new barriers because 'It would be toxic to oppose this' even when losing a lot of money [Reputation]	
BE	Nov 2017	Action	Brainstorming meeting with members [COLL] Discussing whether action with US industry should be under the radar or impactful? [TRANS] No common action with CS [no CS]	
		Perception/ justification	Problem of lack of trust in business 'Since TTIP they (NGOs) are all against trade' [Split Interests] Trying to find common interests with US business [TRANS]	
ECIPE	Nov 2017	Action	Need to change the argument. Make trade less abstract. [COLL]	
		Perception/ justification	The debate [on TTIP] became so toxic that many people... from the business community, did not want to engage...anymore, because they could only lose [Reputation]. Not all businesses support FT [Split interests]. Some sectors even allied with NGOs [CS] NGOs worked in a wide coalition [CS] NGOs had vested interest in maintaining the debate [Split Interests] NGOs were much more driven than Business. 'Only huge tariffs would make people realize what they have'. [Awareness]	
CEC Market access unit. DG TRADE)	Nov. 2017	Action	Industry provides input to the Commission on protectionism through an Advisory Committee (MAAC) [COLL]. Companies are involved in MA working groups which are focused on sectoral interests. [Interests]	
		Perception/ justification	'Protectionism is on the rise and is real.' 'Rules don't matter as much as they used to'. 'The MA report confirms that the rise of protectionism is real, and that it affects European firms and their workers.' It's the first time the Commissioner presented the trade barriers report.	

CEC DG Trade Analysis	Nov. 2017	Perception/justification	No one really remembers protectionism. 'You need to go back to the 30s' [Awareness]. The threat is coming from the US 'this can really make a big change.' Particularly in the context of NAFTA 'they are moving from empty rhetoric to drastic change'.	
Orgalime	Nov. 2017	Action	Worked a lot on TTIP: ' had a joint position paper with the US org – NEMA.' [TRANS] They've not worked so much with their US counterparts lately on protectionism. Many companies are SMEs who delegate to their associations [COLL]: 'our members are very very involved in conversations with their national governments to promote free trade.' [COLL]	
		Perception/justification	'We are not protectionist. We think that free trade would be much better and would help our companies' [interests] On the current wave of protectionism: 'I think we will wait and see a bit more...'	
EURATEX	Nov. 2017	Action	Protectionism is rising...' technically, in the barriers to trade that our companies experience... every day we have to fight more for frictionless trade.' [COLLL]	
		Perception/justification	Changes in the US haven't effected to EU yet: 'can't say that we, as a manufacturing industry, are very worried about the US today. Even though Trump's rhetoric is far from encouraging.' [Awareness].	
BE	Dec. 2017	Action	Seminar with members on priorities. Need to change the narrative [COLL]. 'Of course, informally the message has been passed to the US administration. Also we have passed it to our counterparts [the US CoC]... we have shared our concerns with them'. [COLL; TRANS] 'The call has been for companies to be more active... We really need companies to come out publicly for what they stand for... and to explain why they need trade' [no IND]	B20 (Business leaders from the G20) statement against protectionism in Hamburg July 2017 [TRANS]
		Perception/justification	'We should be first, so that we can frame the discussion on our terms before others do and then we can only be reactive'[COLL] 'Coalitions there (US) are very successful... even in Europe, we see coalitions forming and they are successful [in AD]...' Some trade-dependent employees don't even support trade 'So the trade experts were quite surprised by their own findings. They said 'well maybe we should start with our own employees ...' [Awareness] For companies 'There's a bit of... a mix of complacency and/or they don't know how to do it.' There is also a certain fatalism: 'In the end why engaging? Why trying?' [Ineffectiveness]	

BE	June 2018	Action	Organized the 'Transatlantic Business Works Summit' in Washington in April [TRANS]	
		Perception/justification	In US TAs more active but 'companies are still scared to put their face on it [disagreeing with the administration]'. [Reputation] 'that's what trade associations are there for' [COLL]	
ECCJ	July 2018	Action	Works with TUs, especially ITUC [CS]	
		Perception/justification	a delicate question' to work with cos. But 'often, companies themselves are a lot more positive than their associations.' [CS]	
Amcham	Dec. 2018	Action	They try to develop a positive agenda, highlight the positive elements of TTIP and GVCs [COLL] They have also showcased positive stories on a website: investineurope.eu [COLL]. Tried to engage with NGOs over TTIP: 'a learning experience' [CS] Provide platforms to CEOs [IND] Need to engage more in EP with parties with whom they don't agree. [COLL]	
		Perception/justification	Often NGOs find that it's not trade itself that is the problem, but other issues at national level. [Awareness]	
Amfori	Dec. 2018	Action	His members are still not engaging in the policy debate as they consider that they are not directly affected [no IND]	
		Perception/justification	'Businesses know prices fluctuate, but they don't care about the reasons' [Awareness]. If efforts aren't made to address NGO concerns the backlash will be bad.	Sponsored interview of their DG with Politico in February 2018 defending open trade [COLL]
ETUC	Dec. 2018	Action	They are constantly pushing on linking FTAs to labor standards and all national members are in favor of a sanction-based system. ETUC works together with Unions in partner countries [TRANS CS].	
		Perception/justification	'TTIP brought a lot of attention on trade, which is good. Now we need good rules and political willingness.'	
IndustriAll	Dec. 2018	Action	Intense lobbying on China by a coalition of IndustriAll, AEGIS and Eurofer. Did not lobby against TTIP [no CS]	
		Perception/justification	Protectionism is a tricky issue in the labor movement. 'We're not against trade... At the same time, it is difficult to explain this to workers losing their jobs because of outsourcing.' [Split Interests]	

ACEA	July 2019	Action	Varied messages depending on trade topic. [COLL] They try to push some messages from Europe, but indirectly. [TRANS]	
		Perception/justification	Protectionism makes cars more expensive [interests]. 'If the US listens, its to their industry.' [Ineffectiveness]	
Amcham	Nov. 2019	Action	Trade report 'Fantastic advocacy tool, which makes it tangible'. [TRANS, COLL] Seeking to find a common position on China with other TAs, MS and MEPs. [COLL+] individual co mobilization with MEPs [IND] outreach to NGOs. Recognize need for social policies. [CS]	
		Perception/justification	TAs is a shield for unpopular messages [Reputation] 'We definitely have a lot of work to be doing to build trust.	
Amfori	Nov. 2019	Action	Individual companies still not active 'but that's why they have us. That's why they pay us.' [Awareness; Reputation]	
		Perception/justification	'When I tried to tackle it [protectionism] there was a push-back... Its politically sensitive [Reputation]	
BE	Nov. 2019	Action	For the EP elections it was extremely important for them to speak out with social partners. [CS] Sees Increased TA mobilization. Medef is opening an office in Washington to try to get the message across [COLL] Discussing doing a joint event with US business in Brussels in Feb/march [TRANS]	B20 statement against protectionism in Tokyo meeting March 2019. B7 statement in support of ML in July 2019 [TRANS]
		Perception/justification	Try to talk to US but 'there is no listening voice in administration'. The EU continues to showcase FTAs but 'These are very little things and in the meantime the house is burning.' [Ineffectiveness] . 'You can't discuss trade without China coming up. 'It's the elephant on the room'. TUs are shifting the stance on trade 'very slowly and very little' [CS]	
CEC - President's cabinet	Nov. 2019	Action	'I have very little contact with companies, to an extent to which I find, I must say, a bit surprising'. Also Juncker never met with companies. [no IND]	
		Perception/justification	Maybe the transparency requirements are an issue for them' [Reputation]	
CEFIC	Nov. 2019	Action	Cooperation with US ind? V. good contacts with the ACC. Joint letter on co-operation [TRANS]	Trade director wrote a think piece on the threat of

				protectionism, including to WTO, in mid 2019 [COLL].
		Perception/ justification	Business managers have grown up with ongoing liberalization' They think 'Why worry about trade?' Only a sudden increase in costs will make people become aware [Awareness] Don't talk directly on US politics - operate under the radar [Ineffectiveness]	
Eurofer	Nov. 2019	Action	They talk out rather than members - 'that's what our members it pay us for... That is our job'. [COLL] Overall, companies have become much more active at the national level on trade issues. [IND] On coalition building: we form coalitions against China. 'We work with US industry on this.' [TRANS] No cooperation with NGOs but are in close contact with trade unions. [CS]	
EPFIA	Jan. 2020	Action	Worked with US pharma on a common approach to EU-US talks. It is quite easy, as members of US Pharma and EPFIA are often the same cos [TRANS] When we meet with stakeholders we will often bring companies along [COLL; IND] Occasionally they will act alone [IND]	
		Perception/ justification	Trump is a risk. They see protectionist trends in other countries which are emboldened by Brexit + Trump. 'NGOs don't see trade policy... It's very far off for them.' But on Trump and Brexit their common interests were clear, so they are happy to sign up to statements. [Interests; CS] Membership is aligned on trade issues [Interests; COLL]. 'We are not out of the woods yet. It would be naive to think so.'	
CEC - former senior EUEmbassy	June 2020	Action	Relatively little EU company action. [no IND] Amcham active and effective [COLL] No CS action 'No. Not in relation to this debate. Not in the US'	
			'The WH was pretty impervious to arguments.' [Ineffectiveness] NGOs were not as fixated on trade as the environmental NGOs in Europe, for example.' [no CS]	

Table A4 - Findings on Threat to WTO

Interview subject	Date	Category	Interview Findings	Press releases/public statements
Business Europe	November 2017	Action		
		Perception/justification	'They (US) are paralyzing the WTO.' How can we get China to work by the rules when the US is undermining them?'	
CEC Market Access	November 2017	Action		
		Perception/justification	all previous 232 investigations were prior to WTO, so there are questions on WTO compatibility	
CEC - Trade Analysis	November 2017	Action		
		Perception/justification	Several NAFTA proposals are against WTO rules, but 'The WTO is in a difficult position.' Specifically, there is the fear that, if they rule against the US they will use it as an excuse to leave. In addition, they are causing problems for the DSB.	
Orgalime	November 2017	Action	Following developments [COLL]	
		Perception/justification	What's also very different is the role that the US is playing at WTO level, at OECD level, where, in the past they were really driving the process and being very proactive and now they are obstacles in the nomination of new judges, or they are very silent, and, that, of course, is not a good sign.' 'Its not a good sign for sure, for free trade.' '...we need a functioning system and that is why it's a bit unfortunate that the US keeps blocking the nominations...	
Business Europe	December 2017	Action	Talking to US contacts. [TRANS]	
		Perception/justification	'This [Trump] administration ...is posing a concrete and serious threat to the WTO' 'They don't care. They don't want the WTO. They want to go back to a pre-WTO situation, which is not possible. Its not realistic. Its not beneficial to the US. Its counter their interests.' . 'I think they are a bit	

			split [US ind]. They are in a difficult situation... It depends a lot on who you talk to among their members'. [Split Interests]	
EURATEX	December 2017	Action		Joint report on future industrial policy includes stressing need to defend WTO [COLL+]
		Perception/justification	Obviously...weakening the WTO is not good'. But they are not as worried as Business Europe and amfori in the short term.	
Business Europe	June 2018	Action	Working on position on WTO reform [COLL]	B7 statement in support of ML in July 2019 [TRANS]
		Perception/justification	US grievances towards EU/WTO are grounded in grievances agst China. CH and US need to agree on reform for it to happen.	
Amcham	December 2018	Action	They have met quite a few people, including former WTO people. They are trying to come up with proposals that could help [COLL]	PR welcoming WTO Trade facilitation agreement March 2017 [COLL]
		Perception/justification	We want to develop the WTO, not destroy it.'. 'Its difficult to get companies to wake up.' [Awareness]	
ETUC	December 2018	Action		
		Perception/justification	The 'Original sin' of WTO was that it didn't cover labor rights. In retrospect it should have been included. It would have helped as the DSB works well.'	
ACEA	July 2019	Action		Joint report [COLL+]
		Perception/justification	"For us our general interest is free and open trade as much as possible... within the confines of the ML trading system of WTO' [interests]	
Amcham	November 2019	Action	Strong message on WTO. 'And we here been v. clear with our US colleagues that this is really not ideal' [COLL] Joint workshops with ERT [TRANS]	

		Perception/ justification	Difficulty to make WTO threat tangible to cos. 'Not a lot of our members have a good understanding of how it works in WTO, so it's difficult to be relevant, because there is' a lack of knowledge [Awareness]	
Amfori	November 2019	Action	Not very active. Make statements around the ministerial meetings [COLL]	Joint letter in December 2017 urging progress in WTO with 11 US, Canadian, Japanese, Taiwanese, Mexican and Korean trade associations [COLL, TRANS]. In 2015 a similar letter had 26 signatories.
CEFIC	November 2019	Action	They are concerned, but cos. don't have alarmist messages. [No IND; Awareness]	Trade Director wrote a blog defending ML system and WTO in mid-2019 [COLL]
		Perception/ justification	Its far away compared to Brexit. We see that WTO was v. criticized before, but now it becomes clear that its rules are needed. The left sees that the threat comes from the right.	
Eurofer	November 2019	Action	We have meetings with our members. There is awareness. We have to follow this – what happens has an impact on us. [COLL]	
		Perception/ justification	2001 as the first comprehensive action -Safeguards of Bush – that failed with the WTO knockdown- Created the beginning of backlash against WTO. Since then have been building up a real aversion to WTO. What's happening now is the logical consequence of the sequence. 'The US really stepping out of WTO will impact on all ind. Worldwide. Members will lose discipline.' We need the WTO, but not sure they [China, India] need it.'	
CEC - President's cabinet	November 2019	Action		

		Perception/ justification	Even WTO reform 'I would have thought it would be in China's interest to start discussion...to put the US in a defensive position.' Not so far. Although if they have really changed their minds on the US threat, maybe they will now engage. It's a big question how the US would react to a concerted effort by EU and CN on WTO reform. He wonders whether they have given up on the US, as long as Trump is on charge, or, if they simply think that if the US is not in the system, it's not interesting for them anymore.	
EPFIA	January 2020	Action		
		Perception/ justification	It is a concern as it prevents them calling countries to account (Turkey case). Fighting protectionism has become harder.	
CEC -former EU Embassy	June 2020	Action	No action by US or EU companies in US (no IND). Only saw TAs like Amcham [COLL]	
		Perception/ justification	<i>'Too far away and too abstract... [awareness] And I think quite a number of [US] companies shared the skepticism about the appellate body.'</i> [Split Interests]	

Table A5 - Findings on Brexit

Interviewee	Date	Category	Interview Findings	Press releases/public statements
ACEA		Action		Joint statement on 11/3/19[COLL+]. Regular PRs stressing the integrated supply chains and the employment effect throughout the process, starting April 2017. [COLL]
Amcham	December 2018	Action	Mars talked out about the dangers [IND]	
		Perception/justification		
Amcham	November 2019	Action	Cooperation across sectors [COLL+] Joint position paper with JBC [TRANS] Express companies very active [IND]	
		Perception		
Amfori	December 2016	Action	No action on Brexit	PR calling on parties to ensure that business disruption minimized (March 2017) [COLL]
		Perception/justification	'To be honest [we're] not really [worried]' 'We see a lot of opportunities in Brexit...mainly because all our British members will be non-EU, which will increase our standing as an international organization, rather than European.' [Interests]	
Business Europe	November 2019	Action	Their joint industry statement on Brexit was not that rare 'Once they have agreed on a position inside others can join quite easily' [COLL+]	Regular PRs, but increased at end of 2018 (7 PRs and open letter to European Council between October 2018-April 2019) [COLL]. Joint statement on 11/3/19 [COLL+]. Issued report on impact of no-deal Brexit on 11 anonymous companies in December 2017 [IND]

CEFIC	November 2019	Action	'From the beginning of Brexit, we have stood hand in hand with the UK Ind' [TRANS] Had a good dialogue with NGOs on REACH. They had a common concern and created an ad-hoc coalition [interests]. There is a reference to cooperation on REACH in the WA. It helps that ind and NGOs were pushing together [CS]	Joint industry statement on 11/3/19 [COLL+]. Several statements on various aspects of Brexit. Joint paper with UK ind on preparing for Brexit on February 2019 [TRANS]
		Perception/justification	Companies don't want to get involved in lobbying [NO IND]. Tariffs 'would be a nightmare for everyone.' Business interests not yet the focus of discussion. Later. [Awareness]	
EPFIA	January 2020	Action	There is a clear coalition with a lot of stakeholders across the healthcare sector as a whole [COLL, TRANS]. They have clear priorities in the discussion. People really need new medicines. Overall, the coalition is based on these common interests. [COLL+, CS]	17 PRs on the website between 2016-18. [COLL]
		Perception/justification	Brexit about much more than tariffs.	
EURATEX	December 2016	Action	They are looking at it, but they don't have much to go on. They are working on it with their UK members [COLL; TRANS]	Joint statement on 11/3/19 [COLL+]
		Perception/justification	'We know it will have an important impact, especially on distribution, as many things come in through the UK, in textiles. [interests]	
EURATEX	December 2017 I	Action	Regularly talk to their members and ask for input on this but main action from them as umbrella association; they look at each national context in a more finely grained manner. Tried to get British textile association involved but complicated. Published position papers (June 2017; January 2018). [COLL; TRANS]	

		Perception/ justification	Sector 'is particularly threatened by the re-imposition of tariffs ' but Brexit also about much more than tariffs. 'We are in a paradoxical situation. We, as trade associations,... are sure that firstly, it's an important issue and secondly, there is a potential negative impact which is quite large. But our members, which are largely SMEs are do not at all have this awareness.' [No Ind] 'As the institutional scenario is uncertain, how can you raise awareness amongst economic actors which are small?' [Awareness]	
EURATEX	December 2017 II	Action	Set up a Task Force (see other interview) [COLL]'I must say that today, I don't yet sense movement amongst our members....I would say, they leave the trade associations to do it'. [No IND]	
		Perception/ justification	'We are more worried by Brexit, of course. It will have a more direct impact on our industry.' Their British members are also very worried. [Interests]	
Eurofer	November 2019	Action	Little action	Joint statement on 11/3/19 [COLL+]
		Perception/ justification	He thinks its probably not existential. Not a big issue for them. Still waiting to see what to do. [Interests]	
CEC -former senior EU Embassy	June 2020	Action	Mainly TAs [COLL] Companies reluctant to talk out. Foreign companies talked more easily than UK [TRANS]. US Clients don't want advice on Brexit. 'For the moment they are kind of 'no we're not too worried about it'	

		<p><i>I think cos are reluctant, also because of the polarization of politics...’ ‘I talked to a few companies about Brexit and they said ‘well, we weren’t going to talk out too strongly because we felt we would be boycotted by customers.’ [REPUTATION] After the referendum. Questions about the deal and what should be in it. ‘They said ‘no, no, the mood is now so ugly in the public and there’s such a strength of feeling, particularly amongst the Brexit side, that, if we stick our heads above the parapet, you know, we risk to be boycotted...I’m talking now about retail companies... not big manufacturers.’ ‘These kind of retail people, or supermarkets, they felt that if they were too vocal, this could tarnish their brand name with, you know, the 50% of people who favored leaving.’ Why some companies are not worried? ‘I think its complacency actually. The fact that the UK has left and nothing has changed, leads a lot of people to say ‘well look, it’s all gone fine’ [Awareness]</i></p>	
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Table A6 - Findings on steel and aluminium 232 Tariffs.

Interview subject	Date	Category	Interview Findings	Press releases/public statements
Amcham	December 2018	Action	Keep in touch with key people in Washington. 'They forget about the fact that FDI in the EU is important.' They need to understand the need to balance interests. [COLL, TRANS]	PRs opposing the tariffs (March and May 2018). 3 subsequent PRs seeking to push a positive US-EU agenda [COLL]
		Perception/justification	National Security is a slippery slope' [Interests]	The EU does not pose a national security threat to the US and therefore should not be the target of such measures.' (May 2018)
Amcham	November 2019	Action	Clear message on 232. 'we believe steel and aluminum tariffs are wrong, that it protectionism.' [COLL]	
		Perception/justification		
ACEA	July 2019	Action	Key message is that by blocking access to imported steel, we are increasing prices in the EU. Lobby for a compromise outcome for the whole supply chain 'In the end we want stable supply at reasonable cost.' [COLL+] No cross sectoral effort to avoid 232 [No TRANS]	Joint letter PRs in June, November 2018 and January 2019 of between 6 and 9 downstream users [COLL+]. Three PRs over 2018-19 stressing the negative impact on prices and the unnecessary nature of the EU safeguards.

		Perception/ justification	Objecting to protectionism for ideological reasons as well as interests - other sectors don't need protection. [Interests] 'Eurofer's main focus has always been to ask for retaliation'. The result of the investigation: 'It was a predetermined outcome'. [Ineffectiveness] TUs were not helpful. In the US they are very protectionist	Stress the industry is already suffering from Brexit and potential US tariffs
Business Europe	Nov 2017	Action	Companies are completely worried [Interests]': 'they are trying to make their presence felt. Establish contacts...' [IND]	Referred to in letter to European Council (June 2019). 5 PRs between March 2018-May 2018. [COLL] Letter to US Secretary of Commerce March 2018 [COLL]
		Perception/ justification	US industry divided, so difficult to cooperate [Split interests]	
	June 2018	Action		
		Perception/ justification	'I don't know if you could define us as united'. [Split Interests] MS also divided. Risk of hitting allies with safeguards. US business associations became more outspoken after the tariffs. 'Before they had adopted a policy of working behind the scenes, but after the steel and AL tariffs were announced they started to adopt a more direct approach.' [TRANS]	
Eurofer	November 2019	Action	No action against US tariffs. No (transnational) coalition building against US tariffs either. But we do 'form coalitions against China.' [no TRANS]	Several PRs condemning US 232 investigation and subsequent tariffs. Numerous PRs calling for EU action on China and safeguards against import surges following US tariffs [COLL]
		Perception/ justification	No joint statements with other associations because 'The only one [who would have signed] is China and that's the last one we wanted'. [no TRANS]. On China it works because we have common approach. Mobilizing against the US wouldn't help. They will not sign up the others. 'What's the point? We do not go for these games.' [Ineffectiveness]	
IndustriAll	December 2018	Action	Little action taken	PR in March 2018 raising concerns about US unilateral action [COLL]

		Perception/ justification	We are struggling with the questions whether or not we think that the EU should respond to US protectionism by also imposing tariffs.[Split Interests]' Workers in US and EU, as well as labor union in US, often in favor of such protectionism, but IndustriALL has a more balanced view. On China we have a clear position: we're very much against them dumping [steel] on the EU market.	
Orgalime	November 2017	Action	Wait and see	Condemns imposition in principle in April 2018 but main concern is EU retaliation [COLL]. PR calling for restraint in April 2018. Joint letter with ACEA and others against safeguards June 2018 [COLL+]and subsequent PRs in Nov and January. Letter to Commission calling for abolition, or at least increased quotas in June 2019 [COLL]
		Perception/ justification	It's more a wait and see approach for the time being... I think in the US they've been talking a lot, but we don't see anything in practice yet that really goes against our interests, so I think we will wait and see a bit more, what's going to happen there.' [Interests]	
European Commission - President's cabinet	November 2019	Action	Eurofer came to talk many times. Mainly about China [COLL]	
European Commission Market Access		Action		
		Perception/ justification	The section 232 investigation on steel could have important implications for the EU. All previous 232	

			investigations were prior to WTO, so there are questions on WTO compatibility. [Interests]	
CEC -former senior EU Embassy	June 2020	Action	More action by US companies dependent on EU than EU companies. <i>'They made big efforts to explain to the administration that they couldn't source a lot of this steel in the US, even if you banned imports from the EU.'</i> [TRANS] He spent a lot of time trying to pass this message in the media. That EU is not a mass producer. <i>'And a lot of users said publicly. We can't get this stuff in America.'</i> [IND]	
		Perception/ justification	They said <i>'We've done all the analytics, we have all the facts, but we don't get the impression that anyone in the WH is listening'</i> [Ineffectiveness]	