Argumentation strategies in lobbying: toward a typology

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Abstract

Purpose – This paper develops a typology of argumentation strategies used in lobbying. Unlike in other strategic communication functions such as crisis or risk communication, such typologies have not been proposed in the sub-field of public affairs.

Design/methodology/approach – The article synthesises the strategic communication, political communication and policy studies literature and employs exchange theory to explain the communicative-strategic exchange in public affairs. It showcases its explanatory potential with illustrative examples from Big Tech lobbying.

Findings – The paper describes that categories of argumentation strategies that a public affairs professional will choose are based on the contingency of the issue, policy objective and lobbying objective. The descriptive typology will require empirical testing to develop further.

Social implications – The paper describes how public affairs professionals influence public policy through their argumentation strategies, which sheds light on the usually opaque activities of lobbying.

Originality/value – The proposed typology is the first of its kind for the field of public affairs. Beyond, it contributes communication-scientific insights from a rhetorical tradition to strategic communication research and other social science fields where lobbying is studied, e.g. policy studies.

Keywords Lobbying, Argumentation*, Rhetoric, Communication strategy, Public affairs, Big tech*, Strategic communication

Paper type Conceptual paper

Introduction

Lobbying policy makers to influence policy so that it aligns to an organisation's objectives is predominantly a communicative exchange known as public affairs that trades information, expertise or proclaimed constituent support for a "more favourable hearing" (Thomson and John, 2007, p. 121; Hillman and Hitt, 1999). To understand how this strategic-communicative influence unfolds, this paper proposes a descriptive typology of argumentation strategies used in lobbying by public affairs practitioners.

Public affairs professionals devise language strategies in lobbying campaigns to obtain a policy goal that is in line with their organisation's objectives (Harris *et al.*, 1999; Valentini *et al.*, 2020). This sits within wider strategic communication practice to manage relationships with targeted policy influencing publics (Ihlen and Berntzen, 2007; Fleisher and Blair, 1999). Yet, unlike other public relations (PR) disciplines such as crisis (Benoit, 2014; Coombs, 2007; Cornelissen, 2020; Heath and Palenchar, 2009; Heugens *et al.*, 2004; Seeger *et al.*, 2003) or risk communication (e.g. Renn, 2020), to date no typology has been developed that captures the range of argumentation strategies deployed in lobbying. This paper captures contextual factors that influence argumentation in lobbying and merges these into a descriptive typology (Collier *et al.*, 2008). It does so by first reviewing, and synthesising, current knowledge from the fields of strategic communication, PR, political communication and policy studies. The paper's contribution provides a starting point for further empirical studies to test and amend the typology.

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*not contained in journal's pre-defined list.

The paper creates a set of assumptions, grounded in the results of the literature review, that contend the communication strategies available to public affairs practitioners are finite; that scattered across the literature of different research fields the most frequently deployed strategies have already been broadly identified; they can be assumed to be rational and functional in orientation, with easily understood objectives pursued through strategic communicative action. This paper constructs a descriptive argumentation strategy typology and concludes that arguments deployed in lobbying are dependent on the interaction between contingent factors of the issue, the type of policy and the lobbying objective. The proposed typology's theoretical and conceptual grounding comes from synthesising assumptions from exchange theories, with accepting strategic communication as a process of the discursive construction of meaning (Edwards, 2021). To showcase its utility and potential contribution, the typology is applied to Meta's argumentation strategy for resisting new proposals for statutory regulation of social media.

The content of this paper begins with situating public affairs practice within the strategic communication and rhetorical traditions (Skerlep, 2001). Exchange theories are used to explain and justify important assumptions that are being made to construct the typology. The next sections review existing knowledge and models in relation to categorising policy objectives, lobbying objectives, issue contexts and argumentation in lobbying practice. These are the stepping stones contributing to the final section that proposes a typology describing public affairs argumentation strategies.

Public affairs as strategic communication within democratic systems

Public affairs [1] is a strategic communication specialisation that focuses on the public policy dimensions of relationship building and advocacy (Toth, 2006; Fleisher and Blair, 1999) which McGrath *et al.* (2010) positioned as sitting across the nexus of politics, management and communication. Based on examining previous studies, von den Dreisch and van der Wurff (2016) constructed three functional roles of public affairs practitioners; as mediators who align organisational interests with those of society; as experts who provide valuable information to politicians and as advocates for their clients' interests in the political arena. Public affairs can be difficult to distinguish from broader PR activity (Somerville, 2011; Fleisher and Blair, 1999), with the representatives of the profession reluctant to agree where the boundaries lay between communications that seek to influence political environments and those targeted at wider media and public opinion environments (Davidson, 2016). Lobbying traditionally sits as a tool of public affairs practitioners (Ihlen *et al.*, 2023) and is the term used when the activity is centred more on direct contact and communication with elected politicians and decision-makers in government rather than influencing these constituents indirectly via the media (Binderkrantz, 2012). Increasingly practitioners engaged in lobbying refer to their field of practice as public affairs, precisely because of the importance and significance of longer-term reputation and relationship building activity (Harris and Moss, 2001). This paper aligns itself with a focus on how public affairs and lobbying are grounded in rhetoric and persuasive advocacy, where practitioners are seen as members of rhetorical communities (Koeppl, 2001), who draw on rhetorical traditions (Tusinski Berg, 2009) to influence perceptions of reality on any issue with policy implications (Davidson, 2015) with a particular value placed on research that better reveals how language is used in lobbying practice (McGrath, 2007).

For this paper, lobbying is understood within its wider strategic communication context and as a tool of public affairs practice. When referring to lobbying, the paper is indicating communications directly with institutional policy-makers and elected legislators (Kugler, 2004), as opposed to outside advocacy where wider public opinion arguments are targeted (Schlichting, 2014; Ihlen *et al.*, 2022). Drawing on the definition by the European Union (European Commission, 2020) for its transparency register, lobbying constitutes activities

related to meetings, events and making direct contact with policymakers and legislators; participation in public consultations; and the production and distribution of position papers and briefings. Whereas public affairs will be used as indicating lobbying plus the advocacy, reputation management and relationship building activity aimed at wider media, stakeholder and public opinion. The typology that is proposed is for the argumentative strategy options available when lobbying.

Exchange theories are adopted into this paper to support an assumption that through argumentative polylogues public affairs practitioners and policymakers will make rational exchanges. Exchange theories are common in economics and sociology to theorise long-term relationships between groups as being more likely to develop when there is exchange of resources that both sides perceive to be mutually beneficial. In strategic communication fields such as PR, Turk (1985) and Gandy (1992) used exchange theories to explain the structural relationship between PR and journalism, with PR offering an *information subsidy*, such as data, interviews, pictures or human case studies, in exchange for media coverage of their brand or campaign. Exchange theories also help explore the structural relationship between public affairs practitioners and policy makers. Three broad strategies were identified by Hillman and Hitt (1999) based upon the resources that can be exchanged for policy influence. They categorised the resources as information, financial and constituency building. Bouwen (2002) has identified how interest groups representing business have gained access to EU policy makers by identifying, and providing, the expert knowledge in demand from EU civil servants. In practice, the subsidy provides:

> . . . information on attitudes and dispositions of stakeholders in any given policy arena, but also a flow of expertise and future-oriented technical commentary on the likely impacts of legislative options . . . the subsidy for legislators needs to be translated into demonstrating how it supports the needs of administration and practical problem solving. (Davidson and Rowe, 2016, p. 10)

This information subsidy relates closely to Hall and Deardorff's (2006) influential concept of the legislative subsidy, where public affairs practitioners will provide costly policy research, political intelligence and other labour-intensive support work to legislators. Using this exchange theory concept, we understand and assume lobbying strategies will seek to create a mutual exchange that meets the perceived needs of policy makers. Davidson and Rowe (2016) argued an illustration of the information subsidy is the practice of health policy lobbyists routinely translating clinical research into a discourse of economic benefits such as lowering sickness absence rates or costs to hospitals and thus rendering them understandable by policy makers.

The PR and risk communication literature contains several different typologies of communication exchanges. Often cited strategy typologies include information transmission (Renn, 2020; Heugens *et al.*, 2004; Cornelissen, 2020), dialogue (Kent and Taylor, 1998), advocacy or participation (Heath and Palenchar, 2009). None of the existing typologies detail the communication strategies at the level of the argument, which is why the development of a novel approach drawing on argumentation is fruitful. Such a typology is missing for public affairs, despite being considered a vital part of PR for decades (Fleisher and Blair, 1999). One could argue that the rhetorical situation in risk or crisis communication, where a specific type of crisis or risk requires a preset response (Coombs, 2007; Renn, 2020), is more stable than in lobbying. Yet, numerous real-world crisis response cases or risk communication examples show that the reality is more complex, because culture, setting and media system play a role (see, e.g. the dedicated handbook by Schwarz *et al.*, 2016). Still, communication typologies aid in describing this communicative exchange. Despite the complexities of lobbying in terms of differing interest group, media and political systems (Mahoney, 2007), we argue and show that a typology aids the analysis of lobbying from a strategic communication and exchange perspective.

Lobbying exchanges require the communication of oppositional views, and it has been the rhetorical paradigm that has been most prominent in positing the democratic importance of

argumentation, of organisations putting forward arguments that draw counter arguments. This process is hoped to contribute to democracy by empowering citizens and policymakers to evaluate which policy proposals are most effective at standing up to critical scrutiny (Heath, 2006). The value of argumentation and rhetoric has been extolled through policy ideas needing to survive the scrutiny of public argument, and counter-argument, whereby communicators are helping society to solve problems (Ihlen and Heath, 2019).

To build the proposed typology, a literature search was conducted. In addition to seeking out existing typologies, the search terms and inclusion criteria were structured to seek out existing attempts to create categories relevant to exchange theory and rhetorical approaches to public affairs and lobbying. We searched databases and the contents of strategic communication or policy journals. As this paper used exchange theory assumptions, it searched the literature for work on categorising the objectives of policymakers and for policy typologies. In Table 1, which summarises the proposed lobbying argumentation typology, there are columns for the contingent factors of issue, policy objective (of the policy maker) and lobbying objective which combine to influence the final column, the selection of argumentation strategy. At top of each of these columns, it is indicated which sources from the literature search were most relevant and adapted/synthesised to create the categories that constitute the typology.

The next section draws from the literature how the objectives of policymakers can be categorised to understand their needs within discursive lobbying exchanges.

Policy objectives

The rhetorical game underlying democratic will formation creates shared spaces between vested interests and policymakers where both are guided by their policy objectives. To incorporate the exchange, we needed a framework for categorising the objectives of policy makers. One of the earliest and most widely discussed typologies comes from Lowi (1964, 1972). In this typology, Lowi argued the relationship dynamics between policy stakeholders will vary according to whether policies were categorised as being distributive, protective or redistributive (Lowi, 1972). The typology developed a two-dimensional scale, with at one end the immediate prospect of governments using their coercive powers, and the other end that prospect being unlikely, as well as incorporating the target of governmental coercion (Smith, 2002). *Redistributive* policies which included social welfare policies were believed to hold the most potential for open argumentative conflicts as they opened up ideological dimensions to who are deserving or undeserving recipients of benefits and who should pay for them (Siddiki, 2018). The other main types were regulatory which established norms for voluntary or regulatory constraints on behaviours. *Distributive* policy distributes new state spending and resources, and constituent policies create or modify state institutions. Heckathorn and Maser (1990) summarise the weaknesses in the Lowi typology as coming from the ambiguities between the categories, not least because all policies boil down to benefits, costs or powers given to individuals and may be considered as both distributive and redistributive. Additionally, it has been argued that the typology requires an additional category of morality policy (Knill, 2013). *Morality* policy would include areas such as gambling, assisted dying or sexuality and gender equalities which bring conflicts of social values into regulatory policy making (Baumgartner *et al.*, 2009). Another additional category identified that extends the Lowi typology is *information* which is drawn from Hood and Margetts (2007) classification of policy by government resource. Information is a nodality resource whereby governments can strategically distribute information to society, reform education and seek to persuade people to change beliefs or behaviours (Hood and Margetts, 2007). Environmental or health information in food labelling or vaccine take up campaigns would be included in this category. These have been adapted and applied to our proposed typology, which describes

CONTINGENT FACTORS			ARGUMENTATION STRATEGY
Issue context Adapted from Comparative Agendas Project Code Book	**Policy Objective** Adapted From: Lowi (1964 1972); Knill (2013); Baumgartner *et.al* (2009); Hood and Margetts (2007)	**Lobbying Objective** Proposed categories synthesised and adapted from Mahoney 2007; Baumgartner *et al.,* 2009; Rasch 2018)	**Argument** Synthesis of: Baumgartner *et.al* 2009; Boräng and Naurin, 2015; De Buycker, 2017; Dryzek, 2000; Ihlen *et al.,* 2018; Lauber *et al.,* 2021; Lock *et al.,* 2019; Mahoney 2008; Mialon *et.al* 2018; Nisbet 2009; Renn 2020; Savell *et al.*'s 2014, 2015; Siddiki, 2018; Valentini *et al.,* 2020'; Ylä-Anttila *et.al* 2018
Macroeconomics Civil rights Health Agriculture Labour Education Environment Energy Immigration Transportation Law and crime Social welfare Housing Domestic commerce Defence Technology Foreign Trade International affairs Government operations Public lands Culture Public interest	**1. Regulation and Law** **2. Public spending** **3. Structures and delivery** **4. Values, Ethics and Identity** **5. Information and Persuasion**	**1. Regulation and Law** a. Status quo b. Amend c. Abolish d. Enforce e. Move from voluntary to statutory f. Move from statutory to voluntary g. seek review **2. Public Spending** a. Spend more b. Spend less c. Change formulas for allocating resources d. Change how resources are created (including taxation) **3. Structures and Delivery** a. Set up new organisation b. Re-organize organisation c. Provide public goods and services **4. Values, Ethics and Identity** a. Change culture/practises b. Defend/status quo on culture/practises c. Groups seeking recognition	**Benefits argument** Definition: Helps government achieve objectives, will improve prosperity, quality of life, public health, solve a social problem, support environmental sustainability **Costs argument** Definition: Prevents government achievement of objectives, detrimental impact on prosperity, quality of life, public health, social problems, not environmentally sustainable **Deserving/Undeserving beneficiaries** Definition: The groups or type of person who benefits is deserving/undeserving of that benefit **Feasibility and implementation** Definition: Policy is not feasible/ practical in implementation **Practicality** Definition: Policy is (not) feasible/ practical in implementation **Public support/democratic legitimacy** Definition: Policy is popular therefore should be enacted, enactment would demonstrate responsiveness to deliberative consultations **Stakeholder argument** Definition: Arguments from stakeholders and/or those most affected by issue/policy should be given special consideration by policy makers **Technical/Scientific uncertainty** Definition: Not enough is known to decide on policy, more research or deliberation is required, emphasise any divided opinions among experts **Technical/Scientific consensus** Definition: New research or discoveries

(continued)

			5. Information and Persuasion a. Attitudinal and/or behavioural change	Definition: New research or discoveries support/oppose the policy, emphasise scientific or expert consensus **Middle way**: Definition: Policy should be supported as it is a triangulation between opposing poles, policy represents a form of moderation **Morality** Definition: Policy should be supported or opposed based upon reference to a moral or ethical framework **Administrative efficiency/good governance** Definition: Benefits or hinders cost-effective public administration **Legality** Definition: Policy should be opposed because it contravenes fundamental commercial, civic or human rights, and/or contravenes international law/agreements **Crisis/Window of opportunity** Definition: Issue requires urgent attention, or potential benefit will not be realised if delayed **Public Interest:** Definition: Policy should be supported because it is in the wider interest of society or opposed as the policy benefits a vested interest to the detriment of the general public.

Table 1.

Source(s): Created by the authors

the categories of *Regulation and Law*, *Public Spending*, *Structures and Delivery*, *Values, Ethics and Identity*, and *Information and Persuasion*.

Public affairs objectives

In synchronicity to the policy objectives, public affairs strategists, both inhouse and consultants (Hoffmann *et al.*, 2011), formulate organisational goals in relation to each policy issue. Policy-related goals are the main focus in the political science literature that is concerned with legislative lobbying. The objectives of organisations that lobby constituting a core variable in building models that explore policy influence (Mahoney, 2007). In their broadest conceptualisation, they are broken down to changing or keeping the status quo (see Table 1 in terms of regulation and law: abolish or enforce, move from voluntary to statutory or vice versa; Baumgartner *et al.*, 2009), such as adding to or deleting content from a proposal (Rasch, 2018). The same categories of change or maintain the status quo are reflected when discussing public spending (more/less; change formula or creation of resources) and constituents (new organisation, reorganisation provide new services/goods) and even regarding morality (changing attitudes, raising awareness/recognition).

Besides these policy-related objectives, public affairs are concerned with the organisation's image or relationships. To be able to lobby, an organisation needs to

maintain its social licence to operate such that policymakers consider it a worthwhile partner in the legislative process (Ihlen and Raknes, 2020). A high regard for social and environmental responsibility is often used to maintain and improve corporate reputation, and sometimes also misused (Lock and Seele, 2018). Likewise, attacks on the reputation of an opponent are part of everyday public affairs strategy (Benoit, 2014). Thus, public affairs objectives cover, besides substantive policy objectives, objectives enhancing the image and managing relationships and issue salience-related goals. The latter are dependent on the nature of the issue. We therefore expect that reputation/legitimacy will be present in argumentation strategies to such an extent that it may not be a *variable,* but rather a consistent theme within all texts produced by lobbyists.

Issue contexts

Issues discussed for policy regulation are clearly an important variable influencing choice of argumentation strategy and by nature complex (Klüver *et al.*, 2015; Baumgartner *et al.*, 2009). Larger comparative studies such as the Comparative Agendas Project have categorised public policy issues in 21 major and 220 subtopics ranging from macroeconomics over public lands to culture. Public policy issues are also classified according to the type of legislative lobbying and the thematic policy area (Rasch, 2018).

The communicative construction of the issue (Hallahan, 2001) can be seen as the definition of the status quo that is subject to change (or not). This strategic construction lies in the hands of public affairs managers who "insert facts, values, and public policy solutions into the public dialogue" (Heath and Palenchar, 2009, p. 175). The ensuing discussions over the issue can be conceived of as framing battles (Rettig and Avraham, 2016), where actors try to win the struggle over attention of citizens, policymakers or media outlets (as amplifiers to similar target audiences). Through re-framing, strategic communicators can even create constituencies (Lockwood, 2011). In this vein, it appears sensible to regard public affairs as a discipline of strategically managing public issues (Heath and Palenchar, 2009) and to assume a path dependency of communication strategies deriving from issues and their contexts.

Public affairs language strategies

The literature search found limited, but significant work that proposed broad argumentation categories within the field of public health policy, and the construction of some framing strategies within political science and science communication literature.

Within public health studies, the Policy Dystopia Model (PDM) is a typology of discursive strategies that are observed to be deployed by commercial actors to resist public health or sustainability initiatives, typically on the grounds that they will fail or have undesirable consequences (Lauber *et al.*, 2021; Mialon *et al.*, 2018). These strategies also emphasise economic costs or benefits to "undeserving" groups as part of campaigns to delay, weaken or defeat regulatory proposals. Resonance with PDM comes from Savell *et al.*'s (2014) review of the argumentation strategies used by Big Tobacco when lobbying against restrictions on the marketing of its products, which identified four main types of argument: emphasise negative unintended consequences; suggest policy contravened legal principles; suggest current regulations were suffice and argue there was insufficient evidence to support new restrictions (Savell *et al.*, 2014). A similar review of the alcohol industry found it deployed the same four types of argument (Savell *et al.*, 2015).

The other relevant attempts to categorise language strategies in lobbying came from the deployment of framing theory within political science. For example, studies from the INTEREURO project on lobbying in the EU (Klüver *et al.*, 2015; De Bruycker, 2017; Boräng and Naurin, 2015; Eising *et al.*, 2015; Rasch, 2018) relied on Entman's framing definition (1993) to identify frames used by lobbyists. These are classically differentiated in generic

frames (de Vreese, 2005) – dyads like opportunities versus risks or gains versus losses (De Buycker, 2017) – and specific or thematic frames such as the environment or public health (Boräng and Naurin, 2015). Rasch (2018) differentiated 20 generic frames that include the valence or sentiment (positive/negative), moral values or coalitions. Albeit focussing on arguments rather than frames, Baumgartner et al. (2009) likewise list different thematic types and analyse the valence of the arguments. They found that most lobbyists, no matter if for or against a policy proposal, tend to use negatively valenced arguments.

In science communication, Nisbet (2009) has developed a typology of frames used when contesting science in policy debates. This typology was based upon what he argued was the consistent identification of certain frames that appear in science policy debates, and also arguing there is nothing unique to science policy discourses that would not be found in other policy areas (Nisbet, 2009). This suggests the potential to adapt these frames to wider analysis of language strategies in lobbying. Public accountability, economic development and social progress frames emphasise public interest benefits, while uncertainty or Frankenstein's monster frames link strongly to anxieties inherent in modernisation and risk society (Renn, 2020). There is supporting evidence to suggest policy argumentation in media spaces has shifted from a predominant focus on negative economic costs to scientific uncertainty, and more recently to claims of synergies between economic and sustainability benefits of environmental protection (Ylä-Anttila et al., 2018).

The PDM model and Nisbet's science lobbying typology are both identified as significant and were synthesised and incorporated into the descriptive typology. The framing studies had large overlaps (see Table A1 in the Appendix). Feasibility and implementation, for instance, are found among Rasch's (2020), Baumgartner and colleagues' (2009), Boräng and colleagues' (2014), and Eising et al.'s (2015) frames. Thus, from these lists of frames, we distilled the most commonly detected arguments used in lobbying. We add the "public interest" argument, which has more recently been studied (Ihlen et al., 2018; Lock et al., 2019; Valentini et al., 2020) as a lobbying staple that is used by all sorts of actors, be they for-profit, non-profit, advocacy (Valentini et al., 2020) and often simultaneously (Lock et al., 2019). Common to all these studies of framing or argumentation strategies is that lobbyists' argumentative options are finite, and as such open to typology construction. In the US, the most frequently used arguments were those relating to implementation and feasibility, costs of a proposal, and those touching upon shared values, formulated rather negatively, and in "mundane" language (Baumgartner et al., 2009, p. 135). In the EU, harmonisation, consumer safety and financial market stability were amongst the ones chosen most frequently (Eising et al., 2015). Klüver and colleagues (2015) even broke it down to three broad categories: public, economic and other frames. Lobbyists may also adapt their argumentation strategy to the stage of the policy process (Godwin et al., 2012).

Putting arguments and frames in perspective, Rasch (2020, p. 39) holds that "[a]rguments are the indicators for frames, which again points to the fact that these two concepts heavily correlate." As such this paper proposes a typology of argumentation, not framing, strategies, aligning with pragma-dialectic theory, we regard argumentative discourse as "an exchange of verbal moves ideally intended to serve a difference in opinion" (van Eemeren and Houtlosser, 1999, p. 480). As argued above, the strategic-communicative game of public affairs contains by nature the exchange of differing arguments that reflect the strategic communicators' objectives, the issues' characteristics and the chosen argumentation strategy. These arguments can be applied in all strategies, but are contingent on public affairs objectives, policy making objectives and issues. The typology mirrors real world practice where the argumentation is developed in response to the issue and the policy objectives. Within the exchange theory assumptions deployed to build the typology, the policy objective is the prime organising focus of the lobbying strategy. Argumentation will also be tailored to satisfy the needs of the policy maker. The choice of argumentation strategy

is guided by an understanding of what will be convincing for the priority strategic publics of legislators and officials. Therefore, the typology assumes different types of organisations who have similar policy objectives will cluster around arguments that are understood as being accepted as valid by policy makers. The type of organisation would not be a variable which would lead an organisation to adopt an argumentation strategy not accepted as valid, and consequently doomed to failure.

A descriptive typology of public affairs arguments
In describing lobbying argumentation strategies through the proposed typology, we seek to understand points of exchange between policymaker objectives and those of the lobbyist.

No matter which theoretical lens applied within strategic or political communication literature, there is agreement that public affairs professionals are strategic communicators who can choose from a limited repertoire of communication strategies that are purposive to the organisation's goal in the policy process. While lobbying texts, such as submissions to governmental consultations on policy proposals, might frequently appear to be technical, they are nearly always designed to further influence objectives. Decorum in lobbying requires a deference to subsuming vested interests to the wider public interest (Ihlen *et al.*, 2018), affinity with authentic democratic deliberation (Dryzek, 2000) and in pragma-dialectical theory of argumentation, a grounding in discourses of rationality and consensus seeking. Typologies that assume rational goal-oriented behaviour from both lobbyists and policymakers allow the development of " . . . models of strategic behaviour by interests whose goals conflict" (Godwin *et al.*, 2012, p. 203). Strategy, or strategic manoeuvring, leads us to expect that rhetorical aims will also be present in argumentation, even if the protagonists must always, at least symbolically, hold to their public interest and dialectical obligations (Van Eemeren and Houtlosser, 1999).

Thus, through synthesis of the literature we have reviewed, we describe how the choice of a lobbying argument is dependent on the contingent factors; issue, policy objective and the public affairs objective (Table 1). The main underlying assumption is that when the issue, the policy maker's objective, and the objectives of the organisation lobbying are known, the available argumentation strategies can be derived. Lobbyists may combine several argumentation strategies from the typology and vary which arguments are foregrounded in a text depending on, for example, the political party allegiance of legislators being targeted.

For the descriptive typology, we have clustered findings from the literature review to create proposed categories of argumentation strategy (see Appendix Table A1). To summarise the final column, the *benefits* and *costs* arguments sit logically within the Exchange approach that practitioners will emphasise the tangible benefits of following their policy recommendations (Baumgartner *et al.*, 2009), and Nisbett (2009) also identified social progress as a key frame in policy debates. Conversely when opposing a policy, practitioners will seek to emphasise negative costs, which fits with the PDM (Lauber *et al.*, 2021). This model alongside (Siddiki, 2018) also explains the addition of the *deserving/undeserving beneficiaries'* argument type. The *public support/democratic legitimacy* category is where practitioners seek an exchange involving leveraging policy makers' sensibilities about being seen to be responsive to public opinion. The *stakeholder* category is related to this but is a more explicit attempt to appeal to the norms of stakeholder relationship management. *Technical/Scientific consensus/uncertainty* represents a basic argumentation strategy to roll out supporting evidence or logos, and its frequent use has been established in science and environment policy debates by Nisbet (2009) or as evidenced from Boräng and colleagues (2014), or in the risk frame (de Buycker, 2017). *Middle way* also comes from Nisbet's typology and is recognition that a perceived position of a policy on a spectrum of opinions or standpoints is often used as an argument for, or against, that policy. *Administrative efficiency/good governance* comes from the literature suggesting the importance of both

practicality and the public interest in lobbying campaigns. *Morality* is from the studies such as Rasch (2018) and Baumgartner *et al.* (2008) who suggested it as a policy type, but which is equally an argumentative strategy in itself. *Legal* is a category adapted from historical studies of argumentation of the tobacco industry (Savell *et al.*, 2014). Finally, *crisis/window of opportunity* argumentation means that a crisis or an unforeseen opportunity may bring an issue to the forefront of the policy making agenda. Equally, any campaign seeking to change a status quo needs to convince policy makers to set aside time for new legislation when they have many pressing issues they could attend to, temporal arguments are one way of attempting this.

The typology applied: the case of big tech public affairs argumentation strategies

To illustrate the typology, let us consider a currently high-profile case. In the current period, the public affairs strategies of Meta have increasingly resembled that of the Big Tobacco Playbook. The playbook, also detected in food companies' lobbying (Lock and Seele, 2016), includes manipulation of the evidence base, threats of economic retaliation and argumentation to discredit the evidence base against them, to support their objective of delaying or quashing proposed policies to regulate their product and/or sanctions against corporate misconduct (Savell *et al.*, 2014).

In its essence, Meta is currently on the defensive because it is being accused of being an over-powerful monopoly whose products are harmful, at both the individual and societal levels, with associated calls for intervention by governments. The Cambridge Analytica scandal suggested its product threatened user privacy and the integrity of elections. Meta's Instagram is suggested as a product that may be harmful to the mental health of young people. In September 2021, US Senators were accusing Meta's Facebook product of targeting young people with a product they knew to be detrimental to their health (Rodriguez, 2021), and Meta's arguments in its defence were argued to be increasingly akin to those used by Big Tobacco (Nix *et al.*, 2021). It is a valuable case for exploration as it exposes the increasingly prominent apparent conflict of interests between Big Tech's commercial goals and the public interest goals of civic society stakeholder (van Dijck, 2021). What would Meta say and do next? The sense as cited here from commentators and academics alike is that Meta's argumentation strategy is rather predictable.

When lobbying against regulation regarding social media access and use of young people, Meta has emphasised technical/Scientific uncertainty (Table 2) to such an extent that it has even launched unprecedented, detailed rebuttals of its internal research into Instagram and

Issue 1	Health (Impact of Instagram on mental health of girls and young women)
Policy Objective	Regulation and Law
Public Affairs Objective	1a. Status Quo (Meta's public affairs objective is no new or additional regulation)
Argumentation Strategy	Technical/scientific uncertainty
Example quotes	[Technical/scientific uncertainty] "The question on many people's minds is if social media is good or bad for people. The research on this is mixed; it can be both" [Technical/scientific uncertainty] "External research into the impact social media has on people is still relatively nascent and evolving. . .Some researchers argue that we need more evidence to understand social media's impact on people. Each study has limitations and caveats, so no single study is going to be conclusive" Source: Newton, 2021; Clegg, 2019

Table 2.
Illustrative application of typology to analysis of Meta's issue: health.

Source(s): Created by the authors

the mental health of young people. Karina Newton, Instagram's head of public policy, attempted to argue that the link between Instagram use and mental health issues such as negative body image and suicide was not proven and that "we need more evidence" (Newton, 2021). In a television appearance, Nick Clegg's (then Facebook's head of public affairs) use of technical/Scientific uncertainty was supported with phrases such as "complex interactions", "on a journey" to understand and to downplay the harms of Instagram as only affecting a "minority" of users". When confronted with its monopolistic position as a social media platform, Clegg (2019) has used in a speech the argumentation strategy of emphasising benefits, in terms of investment and jobs in the US, as well as to US global influence. The same speech used the unintended beneficiaries' argument, by suggesting any anti-monopoly policy to break up Meta would be to the benefit of foreign economic rivals such as WeChat and TikTok. Thus, Meta used a combination of argumentation strategies to respond to the needs of different audiences in the policy process. Illustrating the usefulness of the typology, we propose:

Another recent public affairs case of Meta pertains to oligopolistic market power in the aftermath of a privacy scandal on the US 2016 elections. Palmieri and Musi (2020) have demonstrated that Meta's crisis communications argumentation strategy in response to the Cambridge Analytica scandal has been to emphasise the benefits of their product, alongside ethos/identity appeals through claims about their benevolence and competence. This follows what we might expect from the crisis communication literature. In the public affairs dimension of the Meta's crisis, its argumentation resembles the proposed typology of this paper (see Table 3).

Discussion
Public affairs practice and its specialisation lobbying is a form of communication management that aims to build and maintain relationships with public policy actors. As a strategic communication practice in the political realm, it follows specific logics due to contextual dependencies (Lauber *et al*., 2021). For public affairs, a typology that focuses on

Issue 2	Economy (Meta is a monopoly that should be broken up)
Policy Objective	Regulation and Law
Public Affairs Objective	1b. Amend (Meta's public affairs objective is amend self-regulation and oppose break up)
Argumentation Strategy	Benefits; Undeserving beneficiaries; Middle Way
Example quotes	[Benefits] "A company that has created 40,000 US jobs in the last two years, is set to create 40,000 more in the coming years, and contributes tens of billions of dollars to the economy. And with plans to spend more than $250 billion in the US in the next four years."
	[Undeserving beneficiaries] "But chopping up successful American businesses is not the best way to instil responsibility and accountability. . .they also face increasingly fierce competition from their Chinese rivals. Giants like Alibaba, TikTok and WeChat."
	[Middle Way] "And while Facebook is subject to a lot of criticism in Europe, in India where I was earlier this month, and in many other places, the only place where it is being proposed that Facebook and other big Silicon Valley companies should be dismembered is here. . . The real solutions will only come through new, smart regulation instead." Source: Clegg, 2019

Source(s): Created by the authors

language strategies as the dependent variable has so far been absent. The typology in this paper describes how contingent factors, i.e. the type of issue, the policy and organisational public affairs objective determine the discursive argumentation strategy a public affairs professional will use. This strategic communication mechanism, we argue, is observable in all democratic societies of which lobbying is a vital part, because communicative strategies have been observed across national boundaries in industries such as tobacco, food or big tech (Savell *et al.*, 2014; Lock and Seele, 2016). While political communication has been studying lobbying frames and political scientists have looked into arguments as independent variables, and rather focused on the interest group or the policy, this paper suggests a strategic communication perspective that describes how public affairs professionals will choose an argumentation strategy based on contingent factors. Arguments can be seen as discursive responses to the communication needs of policy makers and other stakeholders (Renn, 2020) such as the need for receiving information on a new regulation from industry, to create a dialogue about the distribution of resources, to seek stakeholder participation from various constituents or to a call to action.

The descriptive typology of public affairs arguments originates from a synthesis of strategic communication/PR research with the literature on lobbying and political influence in the political science and political communication literature. We describe lobbying argumentation strategies to understand points of exchange between policy/political objectives and those of the lobbyist. However, it goes beyond previous interest group (Klüver *et al.*, 2015) and political science (Baumgartner *et al.*, 2009) perspectives on lobbying frames in that it puts the language strategy at the centre describing it as dependent on the issue context and influence objective. As the typology is further tested and developed it has the potential to explain which argumentation strategies are chosen by public affairs managers in different contexts and thus develop into an explanatory typology (Collier *et al.*, 2008). Some of the strategies are likely to be more frequently occurring, such as emphasising social-economic costs or benefits of various policy options, and the higher the complexity of the issue or policy proposal the more likely it will be that multiple argumentation types will be used in campaigns. With the future development of corpus data and analysis, the argumentative dimensions to these strategies may ultimately be predictable. This development will need to be enabled by empirical data and eventually support future research with functional orientations (e.g. looking into the effectiveness of organisational strategies across issues) and critical empirical research (e.g. studying language and power; Skerlep, 2001).

From the actor point of view, public affairs is regarded as a communication management exercise where organisations with a vested interest purposefully advance their strategic policy goals (Ihlen *et al.*, 2018; Fleisher and Blair, 1999). Their main vehicle is the argument that underlines their position against other discourse participants in the communicative exchange. This discourse process is most likely to happen in democratic systems where communication is rational and oriented toward consensus even though the latter might be recognised as temporary and open to challenge (Davidson, 2016). The main point is that arguments in the strategic communicative game can only be foreseeable if they are situated in a democratic public sphere where we can assume actors will communicate rationally (i.e. following their strategic organisational objectives). However, comparisons of this democracy-based typology with more authoritarian state forms may be required to further substantiate this view.

Limitations and next steps

There are some limitations to this exchange model. Savell *et al.* (2014) found evidence from studying the Tobacco industry who used lobbying strategies that we cannot not label as

mutually beneficial (Hillman and Hitt, 1999). Strategies such as the threat of litigation, the use of misleading research or arguments, or purposefully ineffective self-regulation. These are important to acknowledge and incorporate into an open discussion of assumptions used in building this model. In some ways, these instances are to be noted but do not necessitate any change to the model. For instance, it is not the objective of this typology to provide any evaluation of the validity of the arguments used in lobbying. Neither is it a tool for deciding what is a good or bad policy. The objective is to categorise, and ultimately, predict what argumentation strategies will be used. Indeed, we can safely assume some arguments will be put forward by some organisations in bad faith. There will always be instances of rhetorical opportunism, hypocrisy, logical fallacies and arguments supported by weak logic or unreliable research. Nonetheless, in the same way PR practitioners mirror media logic and journalistic styles when writing a press release, public affairs practitioners will mirror political logic and policy styles when writing a lobbying briefing, to support a strategy of matching the language supporting their lobbying objectives with the needs and objectives of the policy maker. They will also adapt their argumentation strategy to the policy process and political system. As the proposed typology is based on literature from the EU and US, we cannot assume, without empirical testing, that its premises hold across different political contexts such as non-Western democracies or authoritarian systems. When testing the model with new studies and data, the prevalence of argumentation strategies such as threats of litigation can be quantified. We also assume that public affairs practitioners will have a strong preference for a linguistic orientation towards alignment with public expectations of organisational behaviour, constructing discourses grounded in formulations of the public interest (Ihlen *et al.*, 2018). They will partly have this preference through their strategic communication understanding of the longer-term benefits of good stakeholder relationships and positive external reputation.

This paper puts forward a descriptive typology of lobbying argumentation strategies that needs to be subjected to empirical testing if it is to develop explanatory potential. Such confirmatory research will be an iterative process involving different methods such as large-scale quantitative content analyses of lobbying documents, qualitative case studies (Kugler, 2004) or argumentation analyses to disentangle the interrelations between the variables. Results might, for instance, point to a different clustering of arguments than proposed here. Eventually, this typology will aid researchers in setting up research designs to study the strategic-communicative game of public affairs. It will aid in describing and predicting lobbying argumentation strategies, and may thus generate insights for public affairs practitioners, policymakers and watchdogs to tackle lobbying inequalities. The similarities in argumentation strategy deployed by Meta to the documented strategies of the tobacco and food industries provide encouragement to develop and test the typology further.

Note

1. Public affairs is typically the term used globally for the definitions and conceptualisations of practice outlined for this paper. The USA is a notable exception, due to a historical quirk whereby the 1913 Gillett Amendment attempted to prohibit funds being used for government public relations activity. Consequently, to avoid legal problems, over the 20th century, government communications in the USA have often been re-named as public affairs. This paper is aimed at a global audience and will therefore use the broader, non-US specific understanding detailed in this paper.

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Appendix

Mahoney, 2008	Rasch, 2020	Baumgartner et al., 2009	Börang et al., 2014	Börang and Naurin, 2015	Eising et al., 2015	De Buycker, 2017	Nisbet, 2010
Constituency	Technical expertise	Promote goal	Environment	Self-regarding	Implementation	Opportunities	Social progress (quality of life, sustainability)
Fairness/Discrimination	Political expertise	Inhibit goal	Internal market	Other-regarding	Regulation	Risks	Economic development
Feasibility/Workability	Positive	Impose costs to government	Improve recycling	Ideal-regarding	Harmonization	Gains	Morality/ethics - (right or wrong)
Cost/Economic	Negative	Relief costs to government	Reducing export of waste		Admin and economic burdens	Losses	Uncertainty (a matter of expert understanding)
Technical	Moral, value-based	Impose costs to nongovernmental actors	Costs to producers		Transparency	Consequences	Frankenstein monster (be cautious could get out of control)
Shared goals	Legal	Relief costs to nongovernmental actors	Polluter pays		Mandatory targets		Public accountability (public good)
	Economic	Secondary consequences (not costs)	Implementation gaps		Market integrations		Middle way (compromise between conflicting opinions)

(*continued*)

	Emotional	Feasibility and implementation issues	Administrative efficiency		Employment		Conflict (elite conflicts, more likely to be used by journalists)
	EU-level	Discriminatory impact			Consumer safety		
	Expert knowledge	Magnitude of policy			Health		
	National level	Magnitude of problem			Financial market stability		
	Diagnosis	Appropriateness of government action			Environment		
	Prognosis	Window of opportunity			Climate		
	Feasibility	Enhanced security			Energy		
	Consequences	Support by constituents/groups					
	Coalition	Electoral considerations					
	Counter	Government jurisdiction					
	Bridging						
	Motivational						
	Transformation						

Table A1. **Source(s):** Created by the authors