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Explaining Access Tactics of Human Rights NGOs (HR NGOs) to Members of European Parliament (MEPs): Regarding the Human Rights Situation in Iran

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Abstract

Exchanging of information defines how interest groups access the European Union's (EU) legislative process. In the exchange process, interest groups, based on their abilities and interests, supply policymakers who are pressed for time and staff with relevant information for legitimate access to the EU legislative process. However, while we know about the determinants of access to policymakers based on the existing literature, the literature needs to be more active regarding the determinants of access to MEPs for HR NGOs regarding human rights issues, especially in third countries. Therefore, this research applied a qualitative approach to understanding the determinants of HR NGOs' access to MEPs regarding the human rights situation in Iran. The research started with the question of what determines the access of HR NGOs to MEPs. This research shows that the informational needs of MEPs are crucial determinants of access to MEPs. Furthermore, the findings of this research indicate that besides the informational needs of MEPs, the tactic that HR NGOs employ to access MEPs is another crucial determinant of access to MEPs regarding the human rights situation in Iran.

Keywords: Policymaking, Information, Human rights, Inside tactics, Outside tactics.

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Introduction

The human rights situation in Iran is one of the most serious concerns of many HR NGOs. These organisations attempt to access policymakers on this issue by applying different strategies to convince them to take the necessary step to guarantee human rights in Iran. For example, through detailed research and determined campaigning, Amnesty International tries to be the voice of victims of human rights abuses in Iran¹. MEPs are the prominent policymakers at the EU level that HR NGOs try to access regarding the human rights issue in Iran. HR NGOs try to interact with MEPs because they know the European Parliament (EP) plays a crucial role in protecting human rights in Iran. For example, the EP adopted several resolutions towards Iran and, in its resolutions, asked Iran to implement the Universal Declaration of Human Rights and other international human rights treaties². The other issue that shows the EP is a crucial player in protecting human rights issues worldwide is that the EP is responsible for guaranteeing that all the EU's international relations with third countries are aligned with its human rights principles (Ryngaert, 2018). Due to human rights concerns, the EP has even sometimes refused to approve many agreements signed between the European Union and countries such as Syria, and Morocco (Zanon, 2005).

Therefore, considering the important role of the EP in the protection of human rights in Iran, the main question of this research is what determines the access of HR NGOs to MEPs regarding the human rights situation in Iran? The literature revealed that by supplying relevant information, NGOs could access the EP in the legislative process (Bouwen, 2002, 2004b; Chalmers, 2011). Based on the existing literature, although there are different committees in the EP, MEPs deal with significant issues simultaneously based on their functions. Therefore, policymakers at the EU level operate in highly complex situations and often lack sufficient information to fully understand the nature of some issues and anticipate the consequences of their decisions (Klüver, 2012). On the other hand, NGOs are involved with different policy areas based on their interests and are directly in touch with those instantly impacted by MEPs' decisions (Marcinkutė, 2012; Tallberg et al., 2018). Consequently, NGOs are experts who dispose of expert knowledge about issues related to their cause, and thus they have information advantages compared to MEPs. Thus, MEPs provide access to NGOs to the decisionmaking process in exchange for the information they need.

¹ For more information, check: https://www.amnesty.org/en/location/iran/

² To check EP's resolutions towards Iran, follow this link: https://www.europarl.europa.eu/ delegations/en/d-ir/documents/ep-resolutions

The existing literature discusses the determinants of access to MEPs for NGOs in the policymaking processes on economic or other issues related to the internal issues in the EU (Chalmers, 2011, 2013; Klüver, 2013; Dür, Bernhagen and Marshall, 2015; De Bruycker, 2016; Hanegraaff and De Bruycker, 2020). However, these issues' policymaking processes differ from MEPs' actions regarding human rights issues in Iran or other countries. Therefore, in this study, we are trying to understand the approach for HR NGOs to access MEPs regarding human rights issues in Iran.

The remainder of this research is as follows. First, we present a summary of the existing literature on the determinants of access of different interest groups to EU institutions. In the second part of this research, we briefly explain the methods used. Then, it considers the narratives of HR NGOs' representatives regarding their interaction with MEPs regarding the human rights situation in Iran to outline their access to MEPs. Finally, we describe the determinants of HR NGOs' access to MEPs regarding Iran's human rights situation.

1. Determinants of Access in the Literature

To understand the determinants of access to EU institutions for interest groups, Adam Chalmers (2011) introduces two supply-side factors: information types that interest groups supply to decision-makers and their tactics to send information. Since there was not a detailed list of information types regarding the access of interest groups to decision-makers, based on the existing literature, Chalmers divided information types into: "*expert and politically salient information*" (Chalmers, 2011, 2013, p. 46). The supply of these types of information to policymakers by interest groups is regarded as part of an exchange process. Interest groups supply different types of information to understaffed policymakers facing limitations and expect access to the decision-making process (Bouwen, 2004a, p. 476; Cornella, 2007; Mahoney, 2008; Chaqués-Bonafont and Muñoz Márquez, 2016; De Bruycker, 2016, p. 600; Tallberg *et al.*, 2018, p. 215; Hanegraaff and De Bruycker, 2020).

Expert information refers to "highly technical", "scientific aspects", "datadriven information", and "the effectiveness of a specific policy". On the other hand, politically salient information refers to the level of political and social impact or support regarding an issue under the decision maker's consideration (Chalmers, 2013, p. 46; Hanegraaff and De Bruycker, 2020, p. 527). Dür and de Bièvre (2017) argue that these types of information are not directly related to the substance of an issue but are more related to support and public opinion. Therefore, interest groups signal the level of support regarding an issue under the decision maker's consideration by supplying this information (Hanegraaff and De Bruycker, 2020, p. 528).

Examining the literature shows that access of interest groups to policymakers based on the information types is related to different variables. Pieter Bouwen discusses that the demand for different types of information is related to the function of EU policymakers. For example, based on the EP's function and as the EP's only elected institution, need information that helps MEPs "to evaluate the European Commission's proposals from the European perspective" (Bouwen, 2002, p. 380). Based on the legislative role of the EP, Bouwen argues that MEPs are less in need of expert information but demand more information categorised as political-based information. Therefore, the more interest groups supply information regarding the informational need of MEPs, the more they access them (Bouwen, 2004b, p. 480). However, Chalmers' research finds no support that political-based information like public opinion provides more access to the EP for interest groups. On the other hand, information regarding the social and political impact of an issue that "serve technical details with a specific public or social dimension" has a meaningful relationship with the access of interest groups to the EP (Chalmers, 2013, p. 49).

Furthermore, some researchers discuse that, to supply different types of information to policymakers, interest groups need material resources (Baumgartner *et al.*, 2009; McKay, 2012; Klüver, 2013; Binderkrantz, Christiansen and Pedersen, 2014; Binderkrantz and Rasmussen, 2015; Dür, Bernhagen and Marshall, 2015). For example, Klüver (2013, p. 494) equals material resources to the equipment of interest groups with staff and money. Therefore, interest groups must obtain many material resources to supply policymakers with information. Furthermore, based on the complexity of the policymaking processes at the European level, interest groups need different resources to observe what is going on in the EU institutions and the EU regarding the issue under consideration of the EU institutions. On the other hand, Dür and de Bièvre (2007) argue that NGO limitations regarding material resources cannot supply expert information; therefore, they are more likely to supply political-based information with less value for the EU decision-makers.

The literature focusing on policymakers' informational needs and interest groups' ability to provide certain types of information tells us part of the determinants of access to the policymaking process. Some researchers believe that tactics to send information to policymakers are another critical determinant of access. These researchers divided tactics interest groups employ to access policymakers into inside and outside tactics (Beyers, 2004; Dür and Mateo, 2013; Weiler and Brändli, 2015; De Bruycker, 2016; Hanegraaff, Beyers and De Bruycker, 2016; De Bruycker and Beyers, 2019). By applying inside tactics, interest groups aim to directly access policymakers, while outside tactics indirectly address policymakers (Beyers, 2004). Most scholars that describe inside and outside tactics consider group type and resources as two practical issues in determining tactics (Beyers, 2004; Dür and de Bièvre, 2007; Mahoney, 2008; Dür and Mateo, 2012). Group type refers to whether interest groups are characterised as diffuse citizen interests or groups with business interests. On the other hand, resources are related to material resources like staff or financial resources.

The research finding by Adam Chalmers (2013) indicated that inside and outside tactics are equally effective in the access of interest groups to policymakers. However, some researchers discussed that access tactics' success depends on different issues. For example, some researchers discuss that access to interest groups to the policymaking process based on outside tactics depends on factors such as issue salience and the support interest groups receive from the broader public (Dür and Mateo, 2013). However, Binderkrantz (2012) discusses that powerful and resourceful interest groups employ outside tactics as they have the skill to use media strategies which demand resources.

2. Methods

This paper addresses the determinants of access to MEPs regarding the human rights situation in Iran. The research question guiding this is: what is/are determinants of access to MEPs for HR NGOs regarding human rights issues in Iran? The paper relies on data collected in 2021 and 2022, and it mainly counts on 11 interviews with representatives of HR NGOs.

The method applied for this study is case study qualitative research to explain the determinants of access of HR NGOs to MEPs. To generate the sample related to the research, a list of 96 HR NGOs was prepared. This list was based on these organisations' activities regarding the human rights situation in Iran. Then, we checked if these organisations are registered in the EU or have any offices in the EU to follow their goals. After checking these organisations' activities on their websites and exchanging emails with them, 31 organisations were removed from the list since they were based in the United States or Canada and did not have any activities in the EU. Therefore, we started to exchange emails with the remaining organisations in the list. After exchanging emails with these organisations, 11 accepted our invitation for interviews. Based on the situation caused by the pandemic of Coronavirus, the choice of the method of interviews was challenging. Based on the pandemic situation, three interview methods were applied to interview the targeted interviewees: via skype, phone call or WhatsApp, and exchanging emails.

To start interviews, we had to develop a trustful interview situation for an online interview. First, we conducted online interviews with HR NGO representatives with the help of one of our acquaintances who works as a reporter on International TV. The other method of conducting interviews was through phone calls or WhatsApp. One of the advantages of using WhatsApp was that when the interviewees were busy with other work, we could send them the interview questions by voice and receive the answers by voice. Although the interview duration was longer, it was well accepted by the interviewees.

While asking the target group for the interview, some claimed they were busy based on the situation caused by the pandemic, and they preferred to participate in the interviews only if we sent them the questions by email and they would answer when they were free. After exchanging emails with some of the HR NGOs' representatives, we had the chance to interview two interviewees. However, emailing the question shits was a good method based on the ongoing situation; the researcher could not ask more detailed questions regarding the response to the questions. Fortunately, technological development helped us to conduct interviews, as it was hard for face-to-face meeting during the pandemic. Also, conducting face-to-face interviews takes time and resources to meet the representatives of NGOs since HR NGOs are in different countries.

3. HR NGOs Interactions with MEPs

Researchers in this study first asked general questions about HR NGOs' interactions with MEPs regarding the human rights situation in Iran. Four anonymous representatives of HRNGO said that all of these organisations have regular interactions with MEPs. Interviewee #10#20 said that they often meet MEPs, especially those members of Human Rights Committees, to provide information and ask them to take action on the humanitarian situation in different issues, especially urgent actions regarding the human rights issues in Iran. The other interviewee (#10#15) also said they try to interact with MEPs to present information gathered by their field workers. The interviewee mentioned they have meetings with MEPs on human rights in different parts, especially in Iran. However, the interviewee also mentioned that they try to interact with MEPs when urgent needs arise. Interviewee

#10#13 said that the EP is one of the important international institutions we try to interact with regarding human rights issues related to journalists and freedom of the press. The interviewee explained that they need to interact with MEPs since the EP interacts with the Iranian authorities.

Furthermore, Interviewee #10#13 explained that they provide information to MEPs and expect MEPs to take the necessary actions regarding the rights of journalists who are at risk of violating their rights. Finally, the other HR NGOs (interviewee#10#16), which have regular meetings with MEPs, focuses on religious issues and the rights of minorities.

Two other representatives of HR NGOs (interviewees #10#21 and #10#11) explained that they are not registered in the EU lobbying system; however, based on the longevity of their activities, they have access to members of some parties in the EP. These organisations' access to different parties provides an excellent opportunity for these organisations to have access to MEPs from different countries. Although these organisations have limitations in meeting MEPs in the EP, they are in contact with MEPs in other places. Interviewee #10#21 said that they interact with MEPs and with advisories and assistance of MEPs. These interactions help these organisations present information related to the human rights situation in Iran to MEPs to help them take the needed actions regarding that issue.

While these HR NGOs seem to have extensive interaction with MEPs regarding human rights issues in Iran, some have limited direct interactions with MEPs. Through an interview, a member of an anonymous HR NGO (interviewee #10#14) said that they do not have many interactions with MEPs since they are not registered in the EU lobbying system. Interviewee #10#14 explained that most of their access to MEPs is outside of the EP. The interviewee mentioned their limitations to accessing MEPs as follows:

"First, we have many limitations on access to MSPs. One of these limitations is that we are not registered in the lobbying system in the EU. Therefore, our access to MEPs is limited. The other limitation is finding an MEP whose priority is human rights issues. However, of course, given the priority of some MEPs on human rights issues, we have the opportunity to meet with them at seminars or elsewhere and present information we prepared on the human rights situation in Iran. The last limitation that I can say is "time." Since urgent action is needed in some human rights issues, we must meet MEPs in certain places we do not have access to. So, time is the last barrier to meeting MEPs. However, overall, I can say, based on our organisation's capacity, we have interaction with some of the MEPs."

The other representative of an HR NGO (interviewee #10#17) said that "since we are not registered in the lobbying system of the EU, we do not

have many options to meet many MEPs to present our information, but we try to ask those MEPs that we have access the possibility of sharing our information with other MEPs." Nevertheless, that does not mean they do not have any access to MEPs in different places. Also, they have access to some advisors of some MEPs, which helps them indirectly access MEPs. Three other interviewees (#10#18, #10#19, and #10#12) said that their organisations are newly founded and have access to a limited number of MEPs. Therefore, to improve their chance of having access to more MEPs, they also try to indirectly have access to MEPs through interactions with the advisors of MEPs. The representative of an organisation (interviewee #10#19) explained that since we do not have access to MEPs in the EP, we try to build our networks with MEPs advisors to provide the information we prepared regarding human rights situations in Iran.

Some interviewees (#10#11,#10#20, and #10#15) mentioned that there had been times when MEPs had asked them for comprehensive information on some particular human rights issues. MEPs' requests for information provide a good opportunity for HR NGOs to access MEPs. In some cases, this access has led HR NGOs to discuss various issues with MEPs, which has paved the way for greater access to MEPs. This indicates that in some cases, organisations' access to MEPs is a two-way relationship that ultimately provides an opportunity for NGOs to have more access to MEPs.

4. Information and Access to MEPs

Representatives of HR NGOs conceive their relationship with MEPs as an exchange process of information and access. The exchange process starts with supplying relevant information by HR NGOs to MEPs and expecting access to the decision-making process on Iran's human rights situation in return. According to interviewees (#10#15, #10#13), and #10#11), MEPs face uncertainty in terms of what is exactly going on in the human rights situation in Iran in practical terms, providing a situation to access them. Therefore, MEPs need information on the nature and the scope of the human rights issues in Iran. Furthermore, collecting information on human rights matters needs particular expertise and access to victims and witnesses of human rights violations (#10#11, #10#13, and #10#17). Therefore, it can be challenging for MEPs to have reliable information regarding particular human rights cases or, in general, because they have different priorities. In particular, MEPs might have a generalist orientation on human rights issues; however, they lack the requisite expertise to account for all the details related to a human rights issue. Therefore, HR NGOs consider supplying different

types of information crucial to access MEPs regarding human rights issues in Iran (#10#21, #10#12, #10#11, and #10#17).

HR NGOs distinguish between the types of information they supply to access MEPs: technical and legal information. The technical information supplied by HR NGOs refers to information about particular issues and comparisons of those issues at different times based on facts and figures. Legal information is primarily the legal advice the HR NGOs provide to MEPs. Legal information contains international or European law violations regarding particular cases, such as the incompatibility of some Iranian government actions with the treaties this country accepted.

However, the literature discusses the importance of politicalbased information on the access of interest groups to EU institutions; representatives of HR NGOs explained that the organisations they work for are not the political venue, however they might informally discuss the political impact of HR NGOs in the EU. According to interviewees, the main difference between HR NGOs and other types of interest groups is that other types of organisations try to defend the rights of their constituents; however, they attempt to ensure rights for all members of different societies based on the declaration of human rights. Therefore, they mainly supply expert information regarding the human rights violations.

4.1. Technical information and access to MEPs

Representatives of HR NGOs participating in this research explained that they supply technical information to access MEPs regarding the human rights situation in Iran. For example, interviewee #10#13 said that:

"Through supplying technical information, our organisation tries to access MEPs to convince them to consider the human rights situation in Iran as their priority. For example, we provide information related to the people executed in Iran every year by providing statistics and comparisons of different years and the reason they were convicted to death penalty. With our organisation efforts, I mean by our quarterly or monthly reports in most EP resolutions, we can see the EP condemn Iran for the high number of executions in Iran."

Technical information is data-driven information about Iran's overall human rights situation or special cases, like women's rights. HR NGOs' activities include providing technical analysis based on documented data on human rights violence in Iran . Monitoring human rights issues in Iran allow HR NGOs to collect data and provide technical information regarding the human rights situation in this country and emphasise any issues that need quick intervention. Interviewees' rationale that the technical information would provide them access to MEPs is related to the idea that MEPs need these types of information.

One member of an HR NGO (interviewee #10#11) explained that to access MEPs, it is not rational to send information to an MEP that does not contain reliable and technical analysis not supported by data. The justification for the interviewee's explanation was that MEPs might have basic knowledge regarding some human rights issues in Iran. However, based on MEP's limitations in accessing reliable and technical information, they need information from other sources that helps them to make effective decision. Therefore, based on the interviewee's explanations, MEPs' time limits based on their duties, especially on issues related to the legislative process in the EP, causes them to look for technical information for HR NGOs to access them.

Interviewee #10#14 said: In order to access MEPs regarding the human rights situation in Iran, there is something more important than raw information, which is information based on technical and "evidence-based data." In a nutshell, according to interviewees convincing MEPs based on their need for data-driven information to take the necessary action based on the human rights situations in Iran requires evidence-based and technical information. Therefore, the interviewee's explanation indicates that MEPs' need for technical information regarding human rights issues in Iran increases HR NGOs' chance to convince them to take the required action regarding human rights issues.

4.2. Legal-based information

To access MEPs, besides technical information, HR NGOs also supply legal-based information regarding the human rights situation in Iran. Although according to interviewees, providing legal information requires a high degree of expertise, this expertise is not the same as the expertise used by HR NGOs to supply technical information. In this regard, an interviewee (#10#11) mentioned:

"Apart from the fact that we review human rights issues in Iran based on facts and figures annually or quarterly in annual reports, we also separately review human rights violations in Iran under international law and EU law. We provide information using legal language because EU members have to respect the human rights clause while having relations with third countries. That is why I have separated EU law and international law." According to the interviewees, to access MEPs, they have to supply information not just based on facts or figures (#10#11, #10#14, and #10#21). Therefore, they believe that supplying only technical information is insufficient to access MEPs. In their opinion, combining technical details and a legal-based report provides a better picture of the human rights situation in Iran for MEPs. However, some interviewees were not optimistic that supplying legal-based information would provide them with access to MEPs based on the fact that there are different legal committees in the EP, they consider legal information as expert information, increasing the importance of technical details (#10#13 and#10#16). Therefore, legal-based information is considered a kind of compliment to technical details.

5. Access Tactics

HR NGOs working on issues related to the human rights situation in Iran aim to influence MEPs by accessing them. The two primary access strategies they employ are direct access tactics and indirect access tactics. The aim of the former is to access MEPs directly by exchanging information with MEPs through private communication channels; the latter, on the other hand, is an indirect tactic that aims at putting pressure on MEPs via media campaigns or by mobilising citizens via social media.

In line with the existing literature, we can consider direct communication efforts of HR NGOs with MEPs regarding the human rights situation in Iran as inside tactics that use more direct approaches to MEPs. By contrast, we regard the indirect action of HR NGOs to access MEPs as outside tactics (Dellmuth and Tallberg, 2017; Lucas, Hanegraaff and De Bruycker, 2019). According to De Bruycker and Beyers, interest groups employ outside tactics to contact policymakers or pressure officials during the decision-making process and involve tactics such as 'contacting journalists, issuing press releases, establishing public campaigns, and organising protest demonstrations'(Lucas, Hanegraaff and De Bruycker, 2019, p. 57). In contrast, inside tactics include a more direct contact form between interest groups, such as 'face-to-face meetings, telephone calls, or e-mail exchanges' (Chalmers, 2013, p. 43; De Bruycker and Beyers, 2019, p. 58).

5.1. Inside Tactics and Access to MEPs

The ideal tactic HR NGOs' representatives mentioned to access MEPs on human rights issues in Iran is face-to-face meetings. According to interviewees, this tactic is influential since they can provide MEPs with detailed information related to human rights violations in Iran during a face-to-face meeting. Most interviewees explained that their priority is to employ this tactic to access MEPs. The rationale of interviewees was that they could transmit certain types of information to MEPs indirectly through an interview or other public events, which is also transmittable through faceto-face meetings with MEPs; however, not all information is transmittable through face-to-face meetings is transmittable through other tactics to access MEPs (#10#11, #10#14, and #10#21). The superior efficiency of faceto-face meetings in supplying different types of information encourages HR NGOs to prioritise face-to-face meetings.

Although the interviewees believe that face-to-face meetings provide more space for broader discussions about the human rights situation in Iran, the possibility of face-to-face meetings with MEPs is not the same for all HR NGOs working on the human rights situation in Iran. For example, representatives of HR NGOs registered in the EU lobbying system explained that they could have scheduled meetings with MEPs to inform them of the exact situation of human rights condition in Iran by different types of information. On the other hand, other organisations with limited access to the MEPs' offices try to meet directly with MEPs while attending seminars or other public places. However, they cannot supply much expert information during their meetings with MEPs in seminars and other places outside of MEPs' offices. An Interviewee (#10#14)explained:

"Many times, we have met MEPs in public spaces. These opportunities helped us talk to them about our priorities, and we provided them with some key points of our information that we could not provide them through other access channels. So, although not much information can be provided in these meetings, we can provide the basis for sending information via email and other possible ways."

However, representative of HR NGOs registered EU lobbying system explained that they can have scheduled meetings with MEPs, when urgent action is needed, they barely have access to MEPs. Therefore, they try to indirectly send their messages to MEPs by using media. An Interviewee #10#16 said that:

"In a situation where there is a need for urgent action, our access to MEPs is limited. Time is a valuable factor in an urgent situation. Organising a meeting with MEPs takes time. Also, we know that sending information via emails to MEPs might not be the best choice in this situation since MEPs struggle with different issues. So, in this situation, we have other choices which sometimes work".

The other way to send information to MEPs is sending information by email. Almost all interviewees mentioned that autoatically send information to MEPs by email. However, interviewees pointed out that this is not the best way to reach MEPs for various reasons. The first reason the interviewees mentioned was that based on the explanations they received from the staff of the MEPs' offices, they receive many messages during the day, and it takes time to address them all.

Accordingly, it may take some time for their messages to be responded to and reviewed by MEPs or their staff. For example, interviewee #10# 20 explained that:

"When we want to send our information to MEPs, we consider that there is a possibility that the message is read after a while, so we try to think about other options to send information to MEPs. For example, there was a time that we received a message from an MEP' office after a month. Consider it if we sent that information for urgent action? So, sending information by email is the first choice but not the best choice."

The other reason interviewees mentioned sending information by email to MEPs is not the best option is that they are not sure if MEPs receive the message or not? In addition, the interviewees pointed out that since the priorities of many MEPs might not be human rights issues in Iran, the staff responsible for checking emails might not inform the MEP regarding that issue. For example, interviewee #10#17 said that:

"Our research shows that MEPs themselves do not check emails in many cases. Rather, the person working in the office of the MEP checks the emails and responds to them according to the priorities of the MEP or conveys that information to the MEP. Therefore, even when we send information to MEP's other email addresses, I mean not the official one, we are not assured they will review our information. On the other hand, however, we rarely send information to the personal email of MEPs."

In short, the priorities of MEPs on various issues, the timing of information transfers, and the places where representatives of HR NGOs meet with MEPs play an influential role in the access of HR NGOs to MEPs on human rights issues in Iran based on the inside tactics.

5.2. Outside tactics and access to MEPs

Through interviews with representatives of HR NGOs working on human rights issues in Iran, it seems natural that these organisations use the media to promote their activities to influence the people and MEPs. Interviews on NGOs' relationship with the media and the public show how HR NGOs act as agenda-setters and norm-generators and use the media to pressure MEPs. Representatives of some HR NGOs interviewed stressed that their organisations have separate communication teams. These communication teams publish their activities through the media based on the circumstances and announce their readiness to accept media interview requests. Interviewee #10#18 considers communication with the media and the public essential for HR NGOs. The interviewee added that they use the media for purposes such as awareness of the public and putting pressure on politicians. Using the media is a very effective tool to raise public awareness regarding human rights issues, according to interviewee #10#19. Based on interviewee #10#19, public awareness is essential for their organisations in two ways. First, this awareness helps NGOs raise more money for their targeted projects, and then this awareness can indirectly put pressure on decision-makers.

Interviewee #10#15 took an example of the 2019-2020 Iranian protest in different cities of Iran and how their organisation interacts with the media and the public to pressure decision-makers at different levels. The interviewee believes the organisation he works for without public mobilisation could not effectively pressure MEPs or other politicians regarding that issue. Furthermore, the interviewee explained:

We need to work with the public to raise their awareness about the situation in Iran. Comprehensive media coverage about the 2019-2020 Iranian protest brought much attention to the public and decision-makers at different levels. As people showed their attention to the issue, we could have more access to MEPs to discuss the situation. The media's extensive coverage makes people pay more attention to the 2019-2020 Iranian human rights crisis and pressure MEPs. Furthermore, as the media covers more about the freedom of speech in Iran, MEPs brought the issue to their priority and issued a resolution condemning Iran for the crackdown of protesters in Iran.

The representative of other organisations explained that media help them follow their goal more effectively. Interviewee #10#17 explained that their organisation often uses the media to publicise its activities regarding minorities in Iran. The interviewee explained that since the Iranian government deals harshly with people who smuggle fuel to Pakistan for a living and the unfair treatment of Sunni Muslims, their organisation tries to provide information for the media to inform the world of the human rights situation in Iran. The media also provides essential information for NGO workers. Mid-size HR NGOs frequently use the media to expose their activities. The representative of a mid-size organisation (interviewee #10#11) said that their organisation publicises its activities to catch the public's attention and decision-makers at different levels, especially MEPs. The interviewee summarises their organisation's involvement with the media as follows: "Our organisation often uses the media to expose its activities. These include interviews and the presence of me and another colleague in print publications and websites dedicated to human rights issues, especially human rights issues in Iran. In addition, our organisation produces reports and other publications that record the organisation's activities and publish these publications through various media. Typically, the organisation's website is also the main source of information and requests from the audience for support are from the organisation."

Interviewee #10#15 explained that a strong media team helps them advance their goals regarding human rights issues in Iran. The interviewees' rationale was that using media first provided them with a great tool to express their activities. They can have more financial and political support in different societies by expressing their activities. Second, media can signal MEPs and other policymakers the importance of human rights issues, thereby creating a situation to access them. Interviewee #10#15 took an example to explain the importance of using media in their activities. The interviewee said that:

"During activities in this organisation, there were times that we sent information to policymakers, especially MEPs, but sometimes we did not receive any replies from them. However, when we participated in a conversation on a well-known TV or published an article in a newspaper, they asked us for more information, or even sometimes they provided a situation to talk to them or their advisors directly. So, a media team would lead us to access policymakers like MEPs and provide us more public support."

In interviews with representatives of HR NGOs, it was revealed that these organisations had focused part of their activities on social media as many people use social media. In addition, people's widespread use of social media has given HR NGOs an excellent opportunity to communicate directly with the public. Also, representatives of HR NGOs expressed different characteristics that convinced them to use social media as a great tool to access people and policymakers at different levels, especially MEPs. For example, these media are easily accessible, interactive, produce and exchange content quickly, have long-lasting and changeable content, and their users are accessible according to different interviewees.

According to one of the interviewees (interviewee #10#15), HR NGOs use social media more and more to access people and policymakers because it has a comparative advantage over other media (radio, television and newspapers). One of the advantages mentioned by interviewee #10#15 is the easy access of people to their pages and other pages in social media. According to interviewee #10#15, "considering that people can access news and information in any place and at any time, news transmission in social media is faster than other media types". The rationale of the interviewee was that "following the news on the radio and television requires time at certain times, so many may not be able to follow the news during the day. In addition, newspapers also cover the events of the past few days." According to interviewee #10#17, this advantage has caused even radio and television networks to launch their pages on social media to transmit news to the people. The speed of transmission of information in social media helps HR NGOs reach their goals regarding different issues, especially in situations where urgent action is needed or an issue under discussion by policymakers.

In general, the interviewees had a positive view of the impact of outside tactics on their access to MEPs. Respondents believed that the more their activities were seen in the EU, the more they had access to MEPs.

6. Discussion

The existing literature considers information as a currency of influence in legislative issues in the EU. The findings of this research confirmed the importance of information as a critical determinant of access to policymakers, in our case, MEPs, regarding the human rights situation in Iran. Furthermore, narratives of representatives of HR NGOs who participated in this research revealed that demand for information is a crucial driver of the exchange process between MEPs and HR NGOs which is created by the uncertainty MEPs often encounter when taking significant decisions regarding the human rights situation in Iran. Therefore, in line with the findings of Bouwen, this finding shows that the informational demand of MEPs is a crucial determinant of an exchange process with HR NGOs. However, this research does not support part of Bouwens' finding that based on the EP's structure; they are more in need of political-based information (Bouwen, 2004b). Instead, the finding of this research is in line with the findings of the research conducted by Baroni (Baroni, 2014), that even though MEPs are elected politicians, the informational needs of MEPs can be very technical.

The degree of access to MEPs is higher on technical issues in human rights issues in Iran than political issues, as MEPs' demand for information on the former is higher. However, Bouwen discusses that political-based information is a determinant of access to MEPs in legislative issues; the interviews revealed that HR NGOs informally discuss the political impact of human rights issues in Iran in international or EU affairs with MEPs and do not officially supply political-based information regarding the human rights situation in Iran to access MEPs. Instead, HR NGOs specifically provide legal and technical information. Moreover, besides the demand for MEPs' informational needs, HR NGOs define themselves as human rights advocators and do not categorise themselves as political players in international politics.

Furthermore, the other key determinant of access is HR NGOs' tactics for sending information to MEPs. In line with the existing literature, HR NGOs' tactics to access MEPs can be divided into inside and outside tactics. Employing inside tactics by HR NGOs generates little public exposure. This tactic can take different forms, mainly face-to-face meetings and e-mail exchanges between representatives of HR NGOs and MEPs. While each of these tactics is different in its respect, they address MEPs directly through communication channels that do not enjoy broad public exposure. Scholars generally discuss that these tactics are best for sending expert information. Finding of this research is also in line with the literature that type of information is a key player in the choice of inside tactics. Narratives of representative of HR NGOs indicate that they believe that face to face meeting with MEPs provide them a good opportunity to discuss the human rights issues in Iran in more details. However, HR NGOs do not enjoy the same opportunity to meet MEPs in their offices.

Meanwhile, according to interviews, outside tactics can take the form of press releases, interviews with well-known TV channels, and social media promotion. These tactics address MEPs indirectly and are geared at raising the awareness of a broader audience regarding the human rights situation in Iran by communicating through different forms of media. By drawing a larger audience of people, especially those who are concerned about human rights issues, into a human right issue in Iran, HR NGOs aim to exert pressure on MEPs and convince them to take the necessary actions. However, the existing literature discuss that outside tactics is the last choice of the weak interest groups to policymakers, findings of this research shows that even HR NGOs that are registered in the EU lobbying system consider outside tactics more effective than inside tactics in their access to MEPs regarding the human rights issues in Iran.

However, some researchers discuss the negative role outside tactics plays in accessing interest groups to policymakers. The importance of time to intervene in human rights crises caused outside tactics to be more effective in HR NGOs' access to MEPs. Legislation in the EU follows a particular procedure. The procedure used for a legislative proposal depends on the policy area in question. Based on the legislative procedure in the EU, interest groups can be involved in the policymaking process from the beginning. Therefore, the interest groups have enough time to influence the EU policymaking process. However, time is very decisive in EPs' human rights decisions. Representatives of HR NGOs interviewed for this research clarify that there is an essential premium on supplying timely information to MEPs regarding human rights issues in Iran. According to interviewees, information about a human rights issue that is too late loses its value. Therefore, since most HR NGOs might not have direct access to MEPs when there is a need for urgent actions, outside tactics can help HR NGOs to send their messages to MEPs indirectly.

This research marks the first attempt to examine the determinants of access to MEPs on human rights issues in third countries, in our case human rights situation in Iran. Therefore, we should consider the results of this research based on its limitations. The main limitation of this study is that, however, representatives of HR NGOs claimed that they have access to MEPs regarding the human rights situation in Iran, we could not measure HR NGOs influence on the decisions made by MEPs regarding human rights issues in Iran. Furthermore, some of these HR NGOs might gain access to MEPs without being able to translate this access into outcomes. Therefore, the relationship between access to MEPs and the influence of HR NGOs on them needs further studies.

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