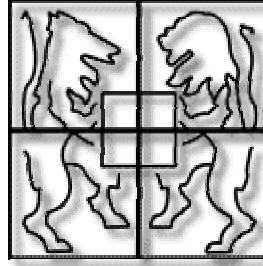# THE NATIONAL CO-ORDINATION OF EU POLICY: MUST EUROPEANISATION MEAN CONVERGENCE?

Dr Hussein KASSIM

School of Politics and

Sociology

Birkbeck College

University of London

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Dr Hussein KASSIM
School of Politics and
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The view that Europeanisation must inevitably lead to a convergence of national institutions is one that is familiar in the specialist literature on the European Union. The 'shift of attention of all national institutions and their increasing participation -- in terms of the number of actors and the intensity – in the EC/EU decision-making cycle' (Wessels and Rometsch 1996: 328), combined with the 'fusion' or 'common sharing of responsibilities for the use of state instruments and the increasing influence of the EC arena on the vertical and horizontal interaction of national and European institutions' (Wessels and Rometsch 1996: 328), it is held, must inevitably produce an increased similarity between institutional forms at the national level.[2]

Theoretical support for this position is lent, moreover, by an important perspective within institutional theory. DiMaggio and Powell (1991), leading exponents of the sociological school of new institutionalism, contend that organisations that interact closely with each other over time progressively develop similarities. 'Powerful forces emerge' (1991: 65) that produce a growing homogeneity of organisational form or 'institutional isomorphism'. Following Hawley, A. (1968), DiMaggio and Powell define isomorphism as 'a constraining process that forces one unit in a population to resemble other units that face the same set of environmental conditions' (1991: 66). Given the increasingly intense and broad-based interaction between national administrations that takes place as a result of participation in EU decision-making processes, a growing similarity of institutional form will inevitably result from the convergent pressures to which they are subject.

Drawing from a detailed examination of the way in which ten member states co-ordinate their European policies, this paper contests this view. If a process of institutional homogenisation among EU member states is indeed underway, one would reasonably expect to find evidence of it

2. It should not be inferred on the basis of these citations that Wessels and Romesch (1996) hold that convergence is inevitable. Indeed, they contest this view. I have cited these formulations, since they capture succinctly two distinct phenomena.

among the national arrangements that have been set up to make and manage EU policy. However, a comparative survey of national systems reveals no such trend. More specifically, this paper presents three arguments: first, that, although each has adapted to the imperatives of EU membership, variation and diversity in the arrangements made for co-ordination still remain; the second, that there is evidence neither of a trend away from this divergent pattern nor of compelling pressures driving the member states towards greater homogeneity; and the third, that these differences are likely to persist indefinitely.

The paper is organised into four sections. The first examines the grounds for believing Europeanisation must lead to convergence, and identifies the pressures towards convergence that derive from EU membership. The second discusses growing similarities between the member states, but demonstrates that the divergences are much greater. The third offers an explanation for the persistence of this pattern of diversity. The fourth section presents the argument for why in the longer term national divergences are likely to continue and most unlikely to disappear.

Europeanisation and convergence[3]

The view that Europeanisation must inevitably lead to convergence has an intuitive appeal. Members belonging to the same organisation are subject to common rules, share common obligations and interact within common structures. Facing the same demands and the same difficulties, it would seem logical to suppose that their responses would also be the same. The call that the EU makes on all member states is extremely exacting. First, the status of the EU as an authoritative policy-making system with the authority to impose binding obligations on the member states that are enforceable by the European Commission and the EU legal system with the European Court of Justice at its apex. Concerted action to define and defend a national position is called for, to ensure that EU policy outcomes are congruent, or at the very least not inconsistent, with national preferences.

The wide and growing competence of the Union in strategically important policy domains provides a second pressure on governments to co-ordinate domestically. At the outset, the EEC was responsible for core areas such as agriculture, competition and external trade. With the signing of the SEA in 1986, the TEU in 1991 and the Amsterdam Treaty in 1997, its responsibilities have expanded to virtually every area of government activity.[5] The adoption of

the internal market programme heralded a period of activism at the European level that saw the Union assume primary policy-making responsibility in a wide number of fields, witnessed the creation of a framework and instruments for common action in domains of high politics, such as foreign and security policy, and justice and home affairs, and revitalised the Commission in the 1980s. The Union wields regulatory power in many areas of economic and social activity, enabling it to take action with far-reaching consequences for national actors and has at its disposal substantial resources for redistribution in the shape of the European Agricultural Guidance and Guarantee Fund and the Structural Funds. The authoritative status of the EU and its reach create powerful incentives on the part of each government to ensure that its component parts act coherently in presenting national positions.

Beyond these general pressures lie more particular requirements that call for co-ordination by governments. The first concerns the six-month long Presidency of the Council of the European Union which member states hold in rotation (Hayes-Renshaw and Wallace 1997, Westlake 1997). The responsibilities of the Presidency, set out in the treaties, in the Council's Rules of Procedure and the documents defining the scope of the CFSP, are extremely demanding, and place a heavy burden on the national administration of the incumbent country (de Bassompierre 1988, O'Nuallain 1985, Hayes-Renshaw and Wallace 1997). The Presidency must chair the European Council and the Council of the European Union in all its formations and at all levels, and perform the varied functions of 'business manager', 'promoter of initiatives', 'package broker' and 'collective representative' (Wallace and Edwards 1976). The Presidency has additional responsibilities regarding the CFSP, it represents the Council before the European Parliament and liaises in the Troika with previous and forthcoming incumbents. Not only must a successful Presidency demonstrate political sensitivity and provide a purposeful, but neutral, chair, but it must also meet the formidable logistical challenges of scheduling and hosting meetings (for an idea of what is entailed, see Kirchner 1992, Ludlow 1993, Henderson 1998). Holding the Presidency confronts the incumbent state with a severe test of its administrative capabilities and requires efficient national co-ordination in order to ensure that the Union is effectively represented and Council business properly conducted.

A second co-ordination need is generated by InterGovernmental Conferences (IGCs). These high-level summits have been convened with considerable frequency in the recent past and

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3. This section draws extensively from H.Kassim, G.Peters and V.Wright 'Introduction', H.Kassim, G.Peters and V.Wright (eds) (forthcoming 2000) *The National Co-ordination of EU Policy: the domestic level*, Oxford University

are of critical importance for every member state. IGCs are the forum in which decisions concerning constitutional change are taken, all of which are likely to have far-reaching implications for member states. Negotiations are wide-ranging and complex, the pressure to secure a 'good deal' for domestic constituencies intense, and the stakes – political and economic - extremely high. In these conditions, national governments face a strong incentive to co-ordinate strategies and tactics: national negotiating positions must be clearly defined, and calculations made about what is and is not negotiable. Co-ordination between national representatives during the negotiations is also necessary.

A third pressure derives from the increased national salience of EU policy. In some countries, such as the United Kingdom and Denmark, EU membership has always been controversial. Both countries preferred the looser form of co-operation afforded by the European Free Trade Association (EFTA), and were latecomers to the Community. In the UK, the relationship with the Union has historically been construed in strongly instrumentalist terms and supporters of integration have consistently - and misleadingly - argued that membership does not involve any threat to national sovereignty (Wallace 1997, Young 1998, Howe 1990, Lord 1992). Since accession, successive governments have felt compelled to emphasise the benefits that ministers have extracted from the UK's partners as a measure of success, thereby, reinforcing the perception that the UK is playing a zero-sum game, and have adopted a defensive posture whenever developments imply the (further) forfeiture of sovereignty. Since the Maastricht IGC, 'Europe' has become an even more sensitive issue, as demonstrated dramatically by the 'No' vote in the Danish referendum and by the 'siege' of the UK Parliament by Conservative Eurosceptics on the government back-benches (Baker, Gamble and Ludlow 1994).

The increased salience of EU policy since Maastricht has not, moreover, been limited to these late arrivals. In France, the negotiation of the TEU marked a watershed in the perception of European integration. Since 1992, and the referendum that took place in September, which produced a narrow victory for the ratification of the Treaty, greater concern has been expressed about the consequences of further integration for French sovereignty and EU issues have become politicized (Flynn 1995, Menon 1996, Kassim 1997). In Germany and the Netherlands, support for the European Union is no longer as widespread or unconditional as it was previously. The level of the national contribution to the EU budget became a major issue in both countries: in

Press.

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Germany, on account of the pressures arising from unification, and in the Netherlands as a result of becoming a net contributor for the first time after Maastricht.

European integration thus confronts national governments with strong incentives to develop institutional arrangements that enable them to deal with the demands of membership. These arise from the general characteristics of the EU, from specific duties and obligations incumbent on the member states, and from the politicization of European matters in domestic political life. However, the co-ordination of EU policy and action is an extremely complex undertaking. Member states are confronted by a set of formidable challenges. The extended front across which the Union engages the member states, the permanence of their involvement and the need for action at two levels - the domestic and the European - impose particularly severe demands. These essential characteristics of the EU call for the creation and maintenance of complex systems of horizontal and vertical linkages on the part of each member state. Governments must take decisions about the aims of co-ordination, the appropriate structures and procedures for their delivery, and the allocation of responsibilities. Each level, moreover, presents its own particular requirements, involves different actors, and is subject to different, and often conflicting, pressures and conditions. Governments must satisfy the demands of domestic constituencies, while at the same time adopting positions that are negotiable in Brussels. These characteristics of the EU call for a 'co-ordination chain [that] extends from that within each ministry and inter-ministerial co-ordination (of both a vertical and horizontal nature) at domestic level, to co-ordinating the domestic-EU interaction and then to co-ordinating within Brussels' (Wright 1996: 149).

Institutional fragmentation also presents national governments with considerable difficulty. Power at the European level is shared between a multiplicity of institutions -- there is no single authoritative legislator (Scharpf 1994, 1996; Hix 1998). Each institution, is internally differentiated, and has its own methods, procedures and culture, exercises varying degrees of power and commands different resources. Lines of division within the Commission, for example, run between the political level -- the College of Commissioner and their *cabinets* -- and the administrative level – the services, which in 1999 numbered twenty four Directorates-General, each with its own responsibilities and identity (Abélès, Bellier and McDonald 1993). The Council of the European Union is also an extremely complex body. Its tripartite structure – working groups, COREPER and ministerial meetings – is differentiated along sectoral lines, its various bodies operate according to differing norms (Lewis 1999) and, with the decline of the

General Affairs Council as a co-ordinator, there is a strong tendency towards fragmentation. Finally, the work of the European Parliament is carried out by its twenty committees, and its organisation and procedures must be agreed by several party groups, that threaten continuously to fragment along national lines.

Sectoralization is an additional feature of the Union that renders national co-ordination problematic. Although an inherent characteristic of domestic policy making, 'the extent and nature of these problems in Brussels is of a different order' (Wright 1996: 130). First, the EU blurs the traditional distinction between foreign and domestic policy, and covers a range of different policy types. The main distinction is between polity issues, such as treaty reform, the power of institutions, external relations and enlargement, and more technical areas that have traditionally been a matter of domestic concern. Further categories within the latter - regulatory, redistributive and distributive - can be distinguished following Lowi (1946). Each policy type has a different logic and conflict potential, and demands a particular kind of expertise. Polity issues, for example, favour diplomats, while sectoral issues call for various technical experts. The construction of an integrated national system that draws together departments and officials with the relevant sets of experience and specialist knowledge is likely to be attended by institutional rivalry and tension.

Second, vertical linkages between decision-making arenas at the European level are strong, whilst horizontal connections are weak. Each area is governed by its own rules and procedures, and involves a different set of actors. The relative power of EU institutions varies from sector to sector, and policy processes, both formal and informal, tend also to be sectorally specific. Within each sector, regular interaction between the same set of actors can lead to a sense of shared identity, a distinctive culture and a degree of introspection (Peterson and Blomberg 1999, Kassim and Menon 1996). Not only is there a real risk that contradictory objectives might be pursued by national officials working in different policy fields, but the possibility either that experts may follow specific aims that are not consistent with more fundamental national commitments or that, by a process of '*copinage technocratique*', technical specialists may collectively escape the control of their governments is present. Moreover, where policy is developed in discrete areas, and particularly where there are conflicts between sectoral networks, it becomes very difficult for a member state to define a national position. Complex trade-offs must be constructed and internally negotiated, which are likely to prove difficult where certain interests are likely to be losers.

The task of national co-ordinators is complicated by further distinctive characteristics of the EU. The most important of these are as follows (Wright 1996):

- 'high institutional and procedural density'. The EU is a 'decisional maze' and 'overcrowded policy arena' (Wright 1996: 151-2)
- 'high committee volume'
- 'the complexity and fluidity of procedures'
- 'the lack of control over agenda-setting' that can be exercised by an single actor/member state
- 'the weakness or absence of channels of co-ordination which are present at the national level' (party discipline, policy networks)
- 'dependence on bargaining, networking and coalition building'
- 'the impact of the changing size of the Union'
- 'an evolving agenda'
- 'range of skills and resources required in decision making'
- 'administrative mismatch between EU structures and the organisation of national bureaucracies'

Under these circumstances, facing common demands and challenges, a similarity of response on the part of the member states may well be expected. More specifically, it is likely that the way in which governments pursue and represent their interests at the European level would be strongly influenced by the institutional structure of the Union and its legislative processes. EU methods demand particular forms of participation in designated forums at defined moments. As governments must comply with EU rules, processes and norms, it is in their interests to ensure that the domestic arrangements that will permit them to make the appropriate input are in place.

A second factor is mimicry and learning (Olsen and Peters, 1996). Some countries appear to have been leaders in co-ordination and other countries may attempt to emulate their structures and procedures. This is especially true for countries entering the EU that may feel the need to develop that co-ordination capacity quickly. By simply copying another country's mechanisms they can obtain this capacity 'off the shelf'. Countries will not tend to copy at random, however, and will tend to copy from countries with rather similar political structures, or with similar administrative styles (Olsen, 1996). Even then, however, form may be copied more easily than substance, and the same

machinery may be effective in one setting but not in another -- a point made about Greece by Spanou (forthcoming 2000).

Coercion is a third pressure, identified in discussions of new institutionalism as a potential source of convergence between organisations (DiMaggio and Powell 1991). Clearly, in the context of the EU, force -- coercion in the strong sense -- is not a relevant concern, but EC law, its binding character and enforcement by a system of courts with the European Court of Justice at its apex, forms a weaker, but nevertheless powerful, coercive pressure. Treaty obligations and secondary legislation not only impose constraints on the freedom of action of governments, but may require action to be taken which otherwise would not have taken place or institutional machinery to be created. Subject to a common legal system, it would be surprising if there were no signs of convergence between the member states in the face of common obligations and restrictions.

Socialisation, whereby national officials become 'gradually socialized into the shared values and practices of the EU system' (Harmsen 1999: 84; see also Haas 1958, Derlien forthcoming 2000, Kerremans 1996, Lewis 1998, Harmsen 1999), is a further pressure. Leading to a 'gradual diffusion of those shared values within national administrative systems', an administrative culture may progressively develop producing over time the 'emergence of increasingly similar national structures and processes' (Harmsen 1999: 84). A number of authors have discovered a socialising logic at work within EU structures and institutions, including the Council (Kerremans 1996), COREPER (Lewis 1998) and the Commission (Christoph 1993). It may be that frequent contact between national officials, their counterparts in other member states and officials in the European institutions, has spread common values among national administrations.

A final influence is a process of what Harmsen (1999: 84) calls 'optimization' (see also Wessels and Rometsch 1996). As governments face similar challenges deriving from membership of the Union, ' a gradual convergence of national practices around the most effective solutions to those common problems' (Harmsen 1999: 84) can be expected. National administrations will be 'driven by a logic of optimization to adopt increasingly similar processes and structures' (Harmsen 1999: 84).[4] Witnessing the benefits that are apparently derived from certain strategies,

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4. Harmsen contests this view, but provides a helpful description of the position.

member states would presumably endeavour to replicate the arrangements that are observed to bring success.

The national co-ordination of EU policy[5]

Investigation of the way in which ten member states co-ordinate their European policies does indeed reveal a number of similarities. All ten have put in place specific arrangements for co-ordinating EU policy making: the responsibilities of existing actors have been adjusted and new ones created, co-ordination mechanisms have been introduced or developed, and special processes and procedures established. Beyond this, six broad similarities emerge: heads of government have put at their disposal specialist expertise and institutional support to enable them to carry out the increasingly routine role they perform in EU decision making; foreign affairs ministries continue to occupy a central role in national processes, though their position is being challenged from a number of directions; inter-departmental co-ordination in EU matters is generally managed by mechanisms that have been specifically devised for the purpose; individual ministries have made adjustments to their internal organisation and procedures; national parliaments usually have a formal role in EU policy making, but are rarely influential; and most member states have a junior minister for European affairs or the equivalent, but the office is not typically central to co-ordination.

Heads of government have historically played a crucial role in the European construction -- Adenauer and de Gaulle in the 1960s, Giscard d'Estaing and Schmidt in the 1970s, and Mitterrand, Kohl, Thatcher and Gonzales in the 1980s. In the past, however, their involvement was sporadic, and they were able to rely on a small number of advisers and the foreign ministry. Since the mid-1980s, their participation has become more frequent and wide ranging. Heads of government assemble regularly for meetings of the European Council, for which the agenda can be lengthy and highly technical. They take the lead, assisted by foreign and finance ministers, in IGCs. Moreover, as the EU has become a more salient issue in domestic politics, it has become necessary to develop early warning systems which alert them to possible dangers, as well as crisis management mechanisms which enable issues that become politicised to be dealt with effectively. This has led to the creation of new national bodies or the strengthening of existing ones at the national level in order to provide heads of government with the institutional support necessary to meet these demands. In the UK, for example, the Prime Minister is supported by the European

Secretariat -- and especially its Head -- the Foreign and Commonwealth Office, and advisers in the Prime Minister's Office or the Number 10 Policy Unit. In Germany, support for the Chancellor is provided by the Chancellor's Office, and in Denmark a special committee is convened to assist the Prime Minister in preparing for European Councils and IGCs. There is a close similarity in function and personnel between these offices.

The centrality of foreign affairs ministries in national EU policy making is a second similarity. In general, though Germany is an exception, foreign ministries are responsible for assuring the formal link between the capital and Brussels -- both with the permanent representation and with the EU institutions -- with national embassies throughout the Union, and with the embassies of the other member states. This function reflects its traditional role in providing and operating a communications infrastructure with the outside world (Spence 1995: 358-61). Finally, Permanent Representations are formally accountable to the foreign ministry, and draw a significant proportion of the their staff from the diplomatic service to provide expertise about issues of 'high politics' (see Kassim, Menon, Peters and Wright, forthcoming 2000).

Across the Union, however, the position of foreign ministries is steadily being eroded. As the importance of the EU in domestic politics has increased and the involvement of heads of government deepened, foreign ministers have increasingly been overshadowed by prime ministers. At the same time, the expansion of EU competencies demands technical rather than diplomatic expertise. Policy specialists have become familiar with the requirements of negotiating in Brussels and developed the necessary skills and connections. As a Danish diplomat, quoted by Pedersen (forthcoming 2000), poignantly remarked, 'we are no longer the only ones who read French'. The spread of new technology has, moreover, weakened the control traditionally exercised by the foreign ministry over communications. Experts in home ministries can make direct contact with their European counterparts or officials in the EU institutions by fax or e-mail, and no longer channel all communication through the foreign ministry. Furthermore, though the foreign ministry is formally responsible for the Permanent Representation, the latter can use its strategic location in Brussels, its specialist expertise and networks at home and abroad to influence the content of the instructions it receives from national capitals. Foreign ministries in countries with strong sub-national authorities face a further challenge. The German Länder and

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5. This section draws heavily from H.Kassim 'Conclusion- The National Co-ordination of EU Policy: Confronting the Challenge' in H.Kassim, B.G. Peters and V.Wright (eds) (forthcoming 2000) *The National Co-ordination of EU*

Spain's autonomous communities have established their own independent offices in Brussels, enabling them to circumvent traditional diplomatic circuits (Derlien forthcoming 2000, Molina forthcoming 2000).

The establishment of new mechanisms, or the adaptation of existing structures or procedures, to manage EU policy co-ordination is a third similarity. Specialist administrative units have been created in France (the SGCI), Spain (the SSEU), the UK (the European Secretariat), Italy (the Department for the Co-ordination of European Community Policies), and Portugal (the DGAC). Committees for managing inter-departmental relations in respect of EU policy exist at the official level in Germany (the *Ausschuss der Europa-Staatssekretäre* -- the Committee of State Secretaries)[6], in Belgium (the P. 11 Committee), in Denmark (the special committees and the EC Committee), in Italy (CIPE, the inter-ministerial committee for economic planning), in Portugal (the CIAC), in Greece (the Economic Committee), and in the UK (EQ[O], the Cabinet committee for European Questions). At the political level, Spain has an Inter-ministerial Committee, Denmark a Foreign Policy Committee, the UK a sub-committee for European Affairs ([E]DOP), Greece an Inter-ministerial Committee, Belgium the Inter-ministerial Conference for Foreign Policy (ICFP) and Germany a Cabinet Committee for European Affairs. Special meetings are a further mechanism for carrying out co-ordination. In Austria, co-ordinators gather every Tuesday afternoon. On the same day in Germany, a committee of up to thirty civil servants from various departments meets to discuss the items on COREPER's agenda and to send instructions to the Permanent Representation.

Adaptation by individual ministries is a fourth similarity. Government departments working in areas with an EU dimension -- virtually all since the implementation of the Treaty of European Union -- have re-organised their internal operation and structures, and introduced new procedures. With the exception of Spain (Molina forthcoming 2000), ministries have established special units to co-ordinate European business internally, to consult other interested ministries and to represent national interests in negotiations in Brussels. They have also adjusted their personnel policies to support, for example, the 'recycling' of officials through Brussels, look to recruit officials with appropriate language skills, and have introduced special training programmes (Maor and Stevens 1996).

Policy: the domestic level, Oxford University Press.
6. The Committee is 'chaired by a Junior Ministers in the Foreign Office and is composed of representatives of that ministry as well as those from the Economics, the Finance and the Agricultural Ministries, from the German Permanent

A fifth common feature that emerges is the limited role that national parliaments play in the process (Wessels and Romestch 1996; see also Norton 1996, Katz and Wessels 1999). Parliamentary committees and special procedures have been put in place to handle European business in all ten member states, but few exercise a continuous influence on policy. This process of 'deparliamentarisation' (Wessels and Rometsch1996), is explained partly by the volume of EU business, its technical character and the speed at which business moves through the Council. Detailed scrutiny demands considerable time and investment of human resources, which are not in infinite supply and for which there is competition from many other sources. It also reflects executive dominance. Even where the legislature is in a strong formal position, the effect of the party system and of internal party or coalition discipline usually at least enables the government to get its way. The case of the EU committee in the Folketing in Denmark, considered the most powerful of all West European legislatures in EU policy, is instructive. Its influence is limited, because it can intervene only at a relatively late stage in the process -- when a dossier reaches COREPER -- and the government does not need to muster a majority in support of each proposal, but must ensure only that there is no majority against.

The sixth -- and final -- similarity is the presence and status of a junior minister for European affairs. Such a post has been created in virtually all the countries considered, but only in France, and then only exceptionally, has the position been occupied by a political heavyweight. The post typically does not carry cabinet rank, may be a technical rather than a political appointment, and does not give its incumbent responsibility for a full-size ministry or department. The minister usually lacks the authority to intervene in other departments and so to manage co-ordination, but may perform important diplomatic duties. Where a minister for European affairs has been an influential figure, as in the case of Elisabeth Guigou in France, this has usually been due to personal standing rather than the attributes of the office. Efforts to strengthen the position, however, would not necessarily make co-ordination any more effective. Establishing a 'proper' European ministry would lead either to the creation of a second diplomatic staff or to a super-ministry that reproduced in miniature the entire national bureaucracy, 'thus, turning the co-ordination requirement from an inter-departmental one into an intra-departmental problem' (Derlien forthcoming 2000).

Representation in Brussels, the State Secretary in the Chancellor's Office responsible for European Affairs, and those State Secretaries whose departmental issues are under discussion' (Wright 1996: 158).

Explaining the similarities

The similarity between domestic co-ordination arrangements can largely be explained by reference to two of the five factors identified in the preceding section. The dominant pressure is indeed that which derives from the institutional structure of the European Union. In common, member states confront processes and procedures at the European level that determine in which forums and under which decision rules, in what sequence and by which actors, business is to be transacted. By shaping the input that member states make in terms of where, when and by whom decisions are taken, pressure is exerted on governments to organise their domestic arrangements accordingly. Two examples illustrate this point. First, the pre-eminent and growing role of the European Council, as well as the greater frequency of IGCs, has led at the national level to an increase in the institutional support available to prime ministers. Second, the various stages of Council deliberation are mirrored in virtually all of the member states with different actors coming into play, special procedures activated or political intervention taking place when an issue moves from working groups to COREPER.

It is, however, important to emphasise that, although domestic procedures bear the imprint of EU structures and move to rhythms produced in Brussels, convergence operates by means of creating incentives which member states may or may not respond to. Union processes encourage organisation of a particular kind, but do not require it. The pressure exerted on national governments is, in this sense, indirect.

The second factor is mimicry or learning (Rose 1991, Dolowitz and Marsh 1996, DiMaggio and Powell 1991). In the face of common problems, the member states have borrowed and learned from each other's experiences. New entrants have typically prepared for accession by examining how structures and procedures operate in existing member states (see Magone forthcoming 2000). Prior to its accession in 1973, for example, the UK dispatched officials to France to inspect the French system of co-ordination (Wallace 1973). More recently, France has returned the compliment in its attempts to transpose elements of the UK model (Lequesne 1993).

Two qualifications need to be made with regard to lesson learning as a pressure towards convergence. First, the extent to which cross-national lessons have been learned, and the mechanisms used in one member state transposed to another, is limited. Mimicry and imitation is not a dominant pressure. Second, as the more general literature on institutional transfer and

learning demonstrates (see, for example, Rose 1991, Dolowitz and Marsh 1996), lessons are typically selectively drawn and imperfectly implemented.

The remaining three pressures discussed in the introduction have played little or no role in generating the similarities between national co-ordination systems. Coercion in the strong sense – force – can be discounted, but in weaker forms, particularly law, it is an important factor in the relationship between the EU and the member states. Action taken by the Union may necessitate adjustment on the part of national governments in a variety of ways (see, for example, Kassim and Menon 1996, Hine and Kassim 1998), and the development, implementation and enforcement of EC law has been important in creating common policies. However, EU activity has been directed mostly towards substantive policy matters or policy output, rarely, if ever, touching on internal administrative domestic processes and procedures. Compulsion can be discounted as a factor so far as institutional adjustment in managing co-ordination is concerned.

Similarly, socialisation, as a process whereby national officials become 'gradually socialized into the shared values and practices of the EU system' (Harmsen 1999: 84), is clearly at work in the functioning of institutions at the European level (see Kerremans 1996, Lewis 1998, Christoph 1993), but has not penetrated national systems, still less brought about their convergence. There is little evidence in the case studies to suggest that frequent contact between national officials, their counterparts in other member states and officials in the European institutions, and the spread of common values have brought about institutional change in national administrations. Moreover, theorists who have contended that socialisation is a powerful factor in bringing about institutional change (see, for example, Haas 1958) have not explained convincingly how the spread of ideas may bring about structural change.

A final possibility is what Harmsen describes as the 'assumption of optimization' (1999: 84). According to this view, which Harmsen strongly contests, since governments face similar challenges deriving from membership of the Union, 'there will be a gradual convergence of national practices around the most effective solutions to those common problems'(Harmsen 1999: 84). '[D]riven by a logic of optimization to adopt increasingly similar processes and structures' (Harmsen 1999: 84), national administrations will converge towards a single model. This explanation can also be discounted. Not only does it exaggerate the extent of existing similarities, but it fails to recognise the existence of deeply entrenched and persisting national differences, and the strength of countervailing tendencies. In addition, it makes the quite

untenable assumption that there is one, single effective strategy. However, as the case studies demonstrated, there has been no consistently winning formula. First, a number of countries can claim to have achieved success at the EU level. Germany influencing the form taken by EMU, the UK in exporting its economic liberalism in the mid-1980s, France in shaping decisively the direction taken by European integration in the 1960s and 1980s, and Italy in securing successful outcomes in areas of 'high politics'. The Benelux countries have also derived substantial benefits from aspects of EU policy development, while Greece, Ireland, Portugal and Spain have been beneficiaries of cohesion at the European level. However, each has adopted quite different co-ordination strategies. Second, administrative efficiency does not translate into effectiveness of influence. France and the UK both have co-ordination systems that are highly-regarded, but their ability to ensure that their representatives 'sing from the same hymnsheet' in Brussels has not guaranteed that their preferences triumph systematically. By contrast, Germany has 'failed successfully' (Derlien forthcoming 2000): its system of co-ordination is complex and can be rather haphazard, but its European policy has been largely successful.

The differences

The broad similarities between national co-ordination arrangements described co-exist alongside differences and specificities that are strongly pronounced. Even in terms of the six features outlined above, the member states are not similarly aligned. Though an important presence across the sample, the foreign ministry plays a different role in the ten countries examined as part of the study. In some member states, such as Denmark, Portugal and Spain, the foreign affairs ministry is the dominant actor. In others, for example, reponsibility is shared either with the economics or finance ministry as in Germany and Greece, with the Prime Minister's department as is the case in Italy or with the Cabinet Office as in the UK. In France it is the SGCI, responsible to the Hotel Matignon rather than the Quai d'Orsay, that sends instructions to France's Permanent Representation.

The role of individual ministries in the overall process of co-ordination and the internal division of responsibilities offer a second example. In the UK, line ministries take the lead in EU policy. Each has a division responsible for internal co-ordination, which takes charge of horizontal issues, acts as trouble-shooter, briefs ministers, and offers specialist advice inside and outside the ministry. It may also create or mobilise networks in Whitehall, Brussels and beyond. In Italy, the ministries have assumed greater power within their field of responsibility, largely as a consequence of a concerted effort on the part of successive governments to combat the country's

poor implementation record (della Cananea forthcoming 2000). By contrast, in Greece, co-ordination units in the ministries tend to be 'conveyor belts rather than think tanks' (Spanou forthcoming 2000) and EU policy is managed by technical experts. In Austria, all ministries have an EU division which takes responsibility over from the technical officials once an issue reaches the Council and collaborates closely with the cabinet of the minister (Müller forthcoming 2000).

Beyond these differences lie more systematic divergences. First, member states have very different co-ordination ambitions. Some have far-reaching, strategic and directive conceptions, and aim to construct an agreed position on every issue and to ensure coherent presentation by all national representatives at every stage of the EU policy process. Others have more modest ambitions that may be substantive – limited to particular policy types or issues -- or procedural -- filtering out policies that conflict with higher aims or ensuring that more important information is exchanged. These ambitions imply very different co-ordination systems. The first calls for an organisation with comprehensive coverage, the capacity to impose decisions 'by imposition or by negotiation, that reconciles potentially competing societal interests and departmental views' (Kassim, Peters and Wright forthcoming 2000), and closely integrated horizontal and vertical procedures. The second suggests a less elaborate system where efforts are limited to ensuring that issues are dealt with by the appropriate department or disseminating information among relevant participants about each other's activities. Three countries stand out as examples that follow the first approach -- France, the United Kingdom and Denmark (Menon, Kassim, Pedersen forthcoming 2000). EU policy making in these states is characterised by an all-encompassing and explicit co-ordination ambition, and a highly centralised co-ordination system. Even within this small group, however, significant differences are apparent.

France has an extremely ambitious co-ordination strategy, aimed at coherently defining and representing French interests.[7] The central body charged with responsibility for ensuring that this ambition is realised is the SGCI, a small elite unit of 150 officials, attached to the Prime Minister's Office – thereby, assuring its centrality and authority – which is admired for its efficiency and expertise (Lequesne 1993, 1996, Guyomarch 1993). The SGCI monitors developments within the EU, 'receives and circulates EU documentation, disseminates information and invites preparatory studies on potential problems of harmonisation with national

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7. 'French positions in all the institutions of the European Union must be expressed with clarity and the greatest possible coherence ... the unity of French positions is a necessary condition of the efficiency of our action ..... [The] requirement of coherence in the French positions imposes the need for a strict respect of the procedures for interministerial concertation' (Prime Ministerial circular, quoted in Menon forthcoming 2000).

law' (Wright 1996: 156). Since 1986, it has also been responsible for overseeing the transposition of EU directives into national law. On receipt of proposals from the Commission and in advance of the Council, the SGCI convenes inter-ministerial meetings which all interested departments attend. As Menon notes (forthcoming 2000), 'the volume of Community legislation means that a virtually non-stop process of meetings takes place at the SGCI -- around ten per day'. In most cases, a position is agreed, but if agreement cannot be reached, the matter is referred by the SGCI to the political level where is discussed by the cabinets of the ministers involved, or in rare cases by the ministers themselves. The SGCI alone is authorised to send instructions to France's Permanent Representation, even where only a single ministry is involved.

The UK has similar ambitions,[8] but its system is less formalised and organised somewhat differently. The European Secretariat -- the functional equivalent of the SGCI – is, with the FCO and the UK Permanent Representation, responsible for EU policy co-ordination. Each performs a distinct function with no obvious rivalry, and the three work closely together. The European Secretariat is also located close to the Prime Minister (in the Cabinet Office) and has similar mission and tasks to the SGCI, but is smaller -- it has a staff of about 20 -- and less interventionist. In the UK system, the lead in the development of national EU policy is taken by the relevant technical ministry, which has primary responsibility for consulting other departments. Although the European Secretariat maintains a watching brief, it intervenes only when a problem arises. Where it senses that guidance is necessary or is informed that interested departments cannot agree, its first response is to try informally to get the parties to reach a solution. If this is not possible, it may resort to more formal means by convening a meeting of the relevant cabinet committee, where it may be necessary to refer a matter upward in search of a solution (Kassim forthcoming 2000). In the UK system, subsidiarity is the governing principle, in contrast to the more coercive approach adopted in France.

Though also centralised, the Danish system is very different from both preceding cases. Co-ordination is achieved through a pyramidal structure of committees, the base of which is formed by the thirty-two special committees. Discussion on Commission initiatives begins in these technical committees that bring together both civil servants from interested departments and

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8. 'for any EU activity or proposal ... agreement is reached on a UK policy in good time, taking account of identified UK interests and advancing or at least protecting those consistent with overall Government policy with realistic objectives taking account of the interests of other members of the EU and that the policy agreed is followed through consistently during negotiation, and put into effect once decisions have been taken in Brussels'.

interest group representatives.[9] The committees are chaired by the lead department, which is responsible for preparing the position paper that provides the basis of discussion, and are always attended by a representative from the Foreign Ministry. Responsibility at the political level lies with two cabinet committees, the EC Committee and the Foreign Policy Committee, both of which are chaired by the Ministry for Foreign Affairs. Although it has lost power in recent years to its senior partner -- the Foreign Policy Committee, which includes the Prime Minister, the foreign minister and the eight ministers most affected by the EU -- the EC Committee remains central (Pedersen forthcoming). The Foreign Policy Committee meets (infrequently) to resolve highly sensitive political issues. The ubiquity of the Ministry for Foreign Affairs underlines its influence in the process.

The differences between the three systems are not restricted to the division of responsibilities within the core executive. The role of the national parliament is markedly different. In France, the National Assembly is peripheral in EU matters. In the UK, Westminster has little influence in routine business, but has sporadically provided a focus for national debate, as during the ratification of the Treaty of European Union. By contrast, the European Committee of the Danish parliament has significant powers. It can veto the negotiating position proposed by the government, enjoys an unusual level of access to documents, and is involved in comitology. Moreover, the circle of participation is drawn more tightly in France and the UK than in Denmark, where interest groups participate directly in co-ordination. In France, private interests are traditionally regarded as policy outsiders (Schmidt 1996), while in the UK, the views of interest groups are taken seriously, but interest groups do not participate in the formal co-ordination processes.

If the similarities between the three member states with far-reaching co-ordination ambitions conceal significant divergences, even greater diversity is apparent among those taking a more relaxed view. Concerning co-ordination aims, Spain has 'an explicit desire to speak with one voice' (Hayward and Wright 1998) -- even if this tends to be realised only at the political level (Molina forthcoming 2000) -- as does Portugal. In the latter case, efforts are concentrated on managing the Council Presidency and in ensuring that Portugal's interests are effectively represented in decisions concerning the Structural Funds. Elsewhere -- in Germany, for example -- there is no explicit overall objective (Derlien forthcoming), though, as in most member states,

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9. The committees can be quite large. Pedersen (forthcoming 2000) gives the example of the committee for environmental affairs which has 75 members.

action concerning sensitive issues or areas is well-organised and may involve the highest political level.

A second difference relates to the actors involved. In Portugal and Spain, the routine co-ordination of EU policy is the exclusive preserve of the foreign ministry. In Greece, however, the Ministry of the National Economy (formerly the Ministry of Co-ordination), has the task of co-ordinating domestic economic policy related to the EU and the actions of the technical ministries, as well as monitoring the adjustment of the economy to EC requirements, while the Ministry for Foreign Affairs is responsible for communication between individual ministries and the EU, and for the Permanent Representation. The former deals with the internal aspects of EU policy, the latter with external relations. Labour is divided somewhat differently in Germany's 'twin-track system' (Derlien forthcoming 2000) where the Ministry for Foreign Affairs co-ordinates treaty-related and institutional matters, and the Economics Ministry bears responsibility for economic and domestic policy issues.

A major difference separates those countries where central government determines policy unilaterally -- for example, Greece and Portugal -- from those where sub-national authorities are involved in decision making. The degree of participation and the form taken vary considerably. In Italy, the Joint Standing Commission of the State and the Regions is the main arena where sub-national interests are articulated, but is only one among many forums for debating European policy, while, in Spain, a special committee brings together representatives from all seventeen autonomous communities. In addition, the Basque Country and Catalonia have won the battle for additional bilateral channels to be opened with central government. Arrangements in Germany and Belgium, by contrast, are more elaborate and the involvement of sub-national authorities detailed and far-reaching. In Germany, the influence of the Länder in EU policy has grown substantially in recent years. Their influence in the Bundesrat, as well as their role in policy implementation, has enabled them to secure a powerful position. Land governments also have in place 'foreign relations systems' (Derlien forthcoming 2000) that not only connect Land ministries with their counterparts and the Economics Ministry in Bonn, but also feature representative offices in Brussels. In Belgium, meanwhile, the six sub-national governments negotiate EU policy on an equal footing with central government (Kerremans forthcoming 2000).

The Länder also participate in the co-ordination process in Austria, even if the failure of a reform effort aimed at maintaining their pre-accession position has left them in a weak position

(Müller forthcoming 2000). Länder representation is assured through the Joint National Office. Although the Chancellery and the Foreign Ministry share responsibility for co-ordination in Austria, the system is very inclusive. All government departments, the national bank, the federation of local communities and the major interest groups participate in the weekly Tuesday meeting that is the formal centrepiece of EU co-ordination in Austria. In terms of inclusiveness, Austria is surpassed only by Italy. The Ministry of Foreign Affairs was historically the main co-ordinator, acting through its Directorates General for Economic Affairs and Political Affairs, but its influence has progressively diminished. Its decline began in 1980 with the creation of the Department for the Co-ordination of European Community Policies, headed by a Minister for European Policy who reports directly to the prime minister. In recent years, the Treasury has become increasingly influential and has taken charge of co-ordinating financial matters. As noted above, individual ministries too have assumed greater responsibility. The influence of three parliamentary committees -- the Foreign Affairs and EC Committee in the Chamber of Deputies, the Special Committee for EC policies, and the Senate's Foreign Affairs Committee and Junta for EC Affairs – should not, moreover, be overlooked.

A further difference relates to the mechanisms of co-ordination. The specialist units, committees and meetings created for the inter-departmental co-ordination of EU policy have been identified above. Although they have similar names, however, their precise form, function and standing differs markedly between the member states. The SGCI in France and the P.11 Committee in Belgium take decisions, while the European Secretariat in the UK facilitates their taking. The Tuesday meeting in Germany performs the function of a post-box, agreeing decisions that have been taken elsewhere. The SSEU in Spain lacks formal authority. Its capacity to achieve co-ordination depends on its ability to mobilise informal networks. At a sectoral level, important differences are also to be found. In contrast to the UK, where broadly similar arrangements are in place across departments, the degree of organisation elsewhere is more uneven across sectors. In Italy, for example, matters of finance are managed very effectively by the national bank and the Treasury, but the same is not true in other sectors, such as transport (della Cananea forthcoming 2000). Likewise in Belgium, there is considerable cross-sectoral variation in the arrangements for co-ordination (Kerremans forthcoming 2000).

More broadly, the repertoire of available mechanisms varies between member states. In the UK, the government is able to draw on the principle of collective Cabinet responsibility and can use party discipline to support co-ordination at the political level. Elsewhere, for example, in

Austria and France, coalition agreements negotiated when a government is formed establish a general framework for European policy within which ministers operate and may serve as a point of reference in co-ordinating negotiating positions in Brussels.

Moreover, the way in which mechanisms operate in practice may be at odds with the official picture. In some member states, the formal mechanisms are 'dignified' rather than 'efficient'. In Germany, the routine co-ordination of EU policy in technical areas largely by-passes the central structures and operates through sectoral networks that link specialists in Bonn, Brussels and the Länder -- hence Derlien's description of it as 'semi-centralised'. The division of responsibilities between the foreign ministry and the finance ministry has produced a two-track system. The first track, which links the foreign office with diplomats in the Permanent Representation and other capitals, handles 'polity' issues and is relatively short. The second track runs from the EU division in the finance ministry down to the Länder and up to technical experts in the Permanent Representation. In practice, contacts between specialists in Bonn, Brussels and the Länder on this second track are strongly departmentalised -- encouraged by the short distance between Bonn and Brussels, and by the principle of Ressortsprinzip (ministerial autonomy) -- and produce what Derlien describes as 'vertical brotherhoods'. These networks, which bring together like-minded experts with similar professional training, enable domestic actors to negotiate the complexities of the multi-level game that confront the federal state,[10] by-passing the formal machinery and increasing the autonomy of ministerial departments vis-à-vis the central co-ordinators. In Greece too, as Spanou argues (forthcoming 2000), there is a disparity between what the presence of the formal structures implies and the reality of co-ordination. A fully-fledged formal apparatus is in place, but does not function. Co-ordination often occurs at the eleventh hour in Brussels, and involves the minister and an official at the Permanent Representation.

A further example of differences in process relates to way in which official and political levels are articulated. In Denmark, France, Germany, and the UK, the two are inter-connected by well-established procedure. In most member states, even if co-ordination is fragmented at the sectoral level or is sectorally-specific, coherent action is possible once an issue reaches COREPER. This is certainly true in Belgium and Spain. In other countries, co-ordination at the

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10. Derlien (forthcoming 2000) uses a footballing metaphor to capture this complexity: 'bureaucratic professionals and (amateur) politicians are playing on three tiers these days: in the second division with 16 teams (Lander), in the first division with 14 teams (Bonn departments) and they join the European Cup competitions with 14 other teams (Brussels), alternating between indoor and outdoor matches (interest groups, Bundestag and European Parliament)'.

political level may be difficult to achieve. Spanou (forthcoming 2000) suggests that this was the case in Greece at least until 1993, which leads her to characterise the Greek EU co-ordination system as a 'truncated pyramid'.

The persistence of national diversity

Though subject to powerful pressures towards convergence discussed above, the member states have developed very different systems of co-ordination. The sources of enduring national distinctiveness can be attributed to five characteristics of the domestic polity: policy style; policy ambition; conception of co-ordination; the nature of the political opportunity structure; and the administrative opportunity structure. These values -- the first three -- and institutional structures -- the last two -- of the pre-existing political system, as countervailing forces, have shaped national responses to the demand for co-ordination exerted by the European Union (see Kassim, Peters and Wright forthcoming 2000).

National policy styles in this context -- though see Richardson, Gustafsson and Jordan (1982) -- relate to whether the state characteristically adopts an impositional or a consensual approach to decision making, whether it is active or reactive in its approach to policy, and whether it consults widely, narrowly or not at all in the policy process. The impact of policy styles on EU policy making is evident across the countries considered. For example, the inclusive approach to decision making that is a characteristic feature of politics in both Austria and Denmark is reproduced in EU policy co-ordination in which the social partners and other interest groups are integrated. Similarly, Belgium's style of consensualism, developed to govern a society segmented along linguistic, clerical and socio-economic lines, informs the way that it makes EU policy. France's system of co-ordination, by contrast, reflects its statist and impositional policy style. Interest groups remain policy outsiders, at least until the implementation stage, and lobbying by private interests is regarded as barely legitimate by state officials (Schmidt 1996, Menon forthcoming 2000). The reactive nature of domestic policy making in Greece has also been transposed to its processes for formulating EU policy.

Policy ambitions -- a second factor -- concern the aims and objectives of governments with respect to the EU. They may be directed towards particular types of policy, for example, polity (or institutional), redistributive or regulatory. They may also embody attitudes towards integration, either advancing ('engine'), or slowing ('brake') or indifference (spectator). EU policy-making arrangements in Germany, characterised by the ability of the Chancellor to

intervene in polity level matters and a relatively relaxed attitude towards achieving cross-sectoral co-ordination, have been shaped by the primary objective of advancing integration. By contrast, suspicion of integration and the desire to preserve national sovereignty lie behind the globalising systems created in Denmark, France and the UK. As Derlien (forthcoming 2000) notes with respect to the latter two, 'the emphasis on ex ante central co-ordination can be explained by the more defensive nature of the two governments towards European integration in the past'. Meanwhile, their concern with EU redistributive policies is reflected in the organisation of co-ordination in Greece, Spain and Portugal (Magone forthcoming 2000).

A third factor is the conception of co-ordination that informs domestic practice (see also Peters, and Hayward and Wright 1998). Conceptions differ markedly from the strongly positive idea that the government should 'speak with one voice' to the less rigorous view that co-ordination means no more than ensuring that tasks are allocated to the relevant unit or that information should be exchanged between departments. These different approaches, moreover, are often tied to other values, such as, for example, the need to construct consensus to legitimate policy choices. They also reflect programmatic stances adopted by government, such as whether an emphasis is placed on positive and coherent action, monitoring or reviewing developments, or avoiding political disasters. These choices carry very different levels of commitment in terms of the mechanisms and procedures put into place, investment of resources, and effort by politicians and bureaucrats.

These conceptions have been readily projected onto the system for co-ordinating EU policy. In the UK and France, for example, the emphasis on unity at the centre of government generates a strongly positive conception of co-ordination, which is embodied institutionally at the centre by the Cabinet Office and the Secrétariat Général du Gouvernement, and by long-standing norms, conventions and administrative procedures, has been extended to EU policy making. Consensus construction that is a central feature of politics in Austria and Belgium has been similarly transposed, as have the more relaxed attitude towards co-ordination taken in Germany, Greece and Italy.

Moving from values to institutions, a number of elements of the political opportunity structure clearly have an impact on the co-ordination of EU policy. The important elements are the nature of the party system, the structure of the executive, the role of partliament, the balance of power between central and sub-central levels of government, and the dominant form of interest

intermediation. The party system influences co-ordination strategy, the system put in place and its operation. Majoritarianism makes possible the pursuit of positive co-ordination, since it allows 'more hierarchical inter-ministerial relations than does a coalition government' (Derlien forthcoming 2000.). The combination of single-party government and strong internal party discipline in the UK, for example, is certainly consistent with the aim of policy coherence -- though this logic was not always operational in the Major years. Coalition government may limit the set of feasible co-ordination options due to the fact that ministries are in the hands of different parties. In Austria, for example, the decision to share the responsibility for co-ordination between the Chancellery and the Foreign Ministry was motivated by the concern of each of the parties in the 'grand coalition', the ÖVP and the SPÖ, to institute a permanent check on its governing partner.

The structure of the executive is also influential. Where unified, as in the UK, the capacity for imposing decisions necessary for the operation of a strongly centralised system is likely to be present. Where divided or collegial, other co-ordination strategies may be necessary. In countries where the authority of the Prime Minister is limited (e.g. in Italy) or where ministerial autonomy is a key principle of government (e.g. in Austria and Germany), ministers can act with considerable independence in the European arena. France usually falls under the first category, but its split executive can permit the harmonious orchestration of EU policy to be disturbed. Although the Hôtel Matignon is the centre of administration, the President can use the foreign policy prerogatives and power of patronage of the office to intervene in European matters. During the first cohabitation, 1986-88, for instance, President Mitterrand's European adviser, Elisabeth Guigou, remained head of the SGCI, which led the premier, Jacques Chirac, to attempt to circumvent her on some issues (Menon forthcoming 2000). Where opposing coalitions hold the two positions, the co-ordination of European policy can become more complex than is suggested by its centralising image.

As discussed earlier, the involvement of parliaments in EU policy making is generally limited. Here too the institutional features of the wider polity have shaped national responses to European integration, since national EU policy co-ordination systems typically reflect the dominance of the executive over the legislature that characterises domestic politics. A more differentiated pattern, however, is evident in the impact of forms of sub-national government. In the unitary states -- Denmark, France, Greece and, until 1998, the UK -- co-ordination is the preserve of central government, while in the federal states -- Austria, Belgium, Germany and

Spain-- sub-national authorities are necessary partners. Amongst the latter, the status accorded to sub-national level of government in EU policy typically reflects their domestic position and responsibilities. In Belgium and Germany, they are equal partners. In Spain, with its system of differentiated federalism, special status has been accorded to Catalonia and the Basque country as noted above (Molina forthcoming 2000). In Austria, the Länder are less influential domestically and in the EU process. Similarly, patterns of interest intermediation -- the final feature of the political opportunity structure -- also exert an influence on EU policy making at the national level. This is illustrated in how widely the circle of participants is drawn. Austria and Denmark lie at the inclusive end of the continuum, reflecting the status of the social partners in domestic politics, while France is situated at the opposite end, its statist approach to domestic policy reproduced in its system for co-ordinating EU policy.

The fifth, and final, factor that shapes national co-ordination systems is the administrative opportunity structure. Two elements particularly stand out from the case studies. The first is degree to which the administration is integrated: Are there sharp vertical or horizontal divisions? Where is the frontier between political appointments and permanent officials? Is there a cabinet system? Do officials belong to a single cadre or to distinct corps? The second is the nature of the administrative culture.   The co-ordination system in the UK reflects the unity of the administration and traditional civil service norms such as information sharing, mutual support and co-operation.   In Italy and Greece, by contrast, more differentiated structures and extensive political patronage help to explain why co-ordination is more fragmented in those countries.

The case studies show that the systems developed by the member states for the co-ordination of EU policy have been shaped primarily by pre-existing domestic institutional structures and values. This accounts for the pattern of enduring national distinctiveness in the face of common pressures that, it is often assumed, must lead inevitably to convergence. These findings are largely consistent with a new institutionalist perspective which interprets the development of national EU policy making systems as a specific case of institutional change or reform (Olsen 1997, Peters 1999; see especially Harmsen 1999). In theorising about reform, March and Olsen (1984, 1989: 53-67) argue that when compelled to adapt to changes in their environment, institutions have a preservative tendency, and endeavour to renew their position, identity and status in the face of new challenges. Institutions conceive of change in terms of existing conceptions of legitimate political forms, as well as 'more diffuse values concerning the correct distribution and exercise of public power' (Harmsen 1999: 85).   Collectively these

constitute what March and Olsen term a 'logic of appropriateness' (1989: 21-39). Applied to the impact of European integration on national political system, as Harmsen argues, the pressures exerted by EU membership 'are necessarily mediated through the existing institutional structures and values which characterise each national politico-administrative system' (1999: 85). The responses of the member states reflect the 'pre-existing balance of domestic institutional structures, as well as the broader matrices of values which define the nature of appropriate political forms in the case of each national polity' (1999: 81), and the outcome is a pattern of national differentiation.

Two notes of caution need to be struck, however. First, although important differences exist between the member states, the presence of the similarities discussed above should not be overlooked. Thus, accounts which reveal a pattern of differentiation (Harmsen 1999) or 'uneven Europeanisation' (Metcalfe 1994) only describe half the picture. Second, national systems for the co-ordination of European policy are strongly influenced by features of the wider national polity, and institutions may seek to replicate their domestic standing in the EU policy-making structure. However, it should not be assumed that they will be successful. The national arrangements for managing EU policy are the outcome of interactions among national actors, institutions and values, as well as between the latter and pressures from Brussels. For this reason, pre-existing domestic institutional structures and values are not isomorphically reproduced in EU policy co-ordination systems. European policy is an arena within which institutions battle for influence, drawing from the resources that they enjoy in the domestic arena and aiming to attain a similar or better position, but never being certain of being able to do so. It confronts domestic actors with a new environment and privileges, in virtue of the demands that it makes, some institutions over others.

Why national differentiation is likely to endure

The sources of the differences between national systems of EU policy co-ordination are located in fundamental features of the domestic polity. These basic elements of the political and constitutional structure of each member state are deeply rooted in essentially national processes of historic struggle, conflict and compromise. Although not beyond the reach of the impact of developments at the European level, these basic features have not been subject to direct, continual or systematic pressure. In terms of institutional theory, the EU is one environment, but not the only environment or even the most important one.[11] EU action may have profoundly affected

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11. I owe this point to Guy Peters.

national policy outputs and modes of economic governance and state intervention. The discipline imposed by EU membership may have been internalised by decision makers at the national level. However, the way in which the member states have responded to the demands made of them by participation in the EU has been shaped by the structural features of national political systems over which the Union can exercise little influence. In this context, it may make more sense to speak of domestication than of Europeanisation. Moreover, the EU post-Maastricht, which is more intergovernmental and more constrained by popular suspicion of integration as an elite process, is not likely to develop the powers that would grant it these abilities.

Conclusion.

This paper has argued that Europeanisation does not necessarily lead to convergence. Member states have responded to the demands that have arisen from membership of the Union, interact at the European level in a multiplicity of policy-making and deliberative forums, and are increasingly drawn together in making joint decisions across a broad range of policy. However, though subject to common pressures, they have developed markedly different institutional arrangements for co-ordinating European policy. The way that policy is managed has been profoundly influenced by domestic features that beyond the reach of the Union. Europeanisation, or the impact that the EU has had on the member states is very much in evidence, but convergence does not seem a likely eventuality.

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