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The relationship between Europeanisation and policy styles: a study of agricultural and public health policymaking in three EU Member States

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ABSTRACT


The role of policy styles in policymaking has attracted renewed scholarly interest in recent years. One of the central debates in this literature revolves around the question of how to reconcile archetype national policy styles with considerable differences in *modus operandi* across policy sectors. A sector-specific feature that is considered a key determinant of the manifestation of archetype national policy styles in the European Union is the degree of Europeanisation of policy sectors. This paper picks up this suggestion by addressing the question of whether and how Europeanisation affects the degree to which features of an archetype national policy style are manifest within a sector. We address this question by exploring sectoral policy styles in agricultural and food-related public health policymaking across three EU Member States: The Netherlands, the United Kingdom (England), and France. Our findings suggest that the degree of Europeanisation of a policy sector *does* prove an important condition that helps to understand the relationship between national and sectoral policy styles. More specifically, Europeanisation has the strongest effect when sectors face a higher adaptation pressure, i.e., when there is a larger misfit between sectoral regimes and EU-induced institutional demands. We suggest various promising avenues of future research on this relationship.

KEYWORDS Adaptation pressure; agricultural policy; Europeanisation; food policy; policy regimes; policy styles

Introduction

The role of policy styles in policymaking has attracted renewed scholarly interest in recent years. After rapidly gaining popularity in the 1980s following a series of studies on West European governments' 'standard operating procedures' (Gustafsson & Richardson, 1980; Richardson, 1982; Richardson

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et al., 1978), the concept lost much of its appeal in following decades. Two fundamental points of criticism had reduced the use of national 'modus operandi' for explaining policy variation and change. Firstly, the initial typology of national policy styles by Richardson and colleagues remained remarkably short of empirical support. Already in their own comparative study of European policy styles, they found more similarity between national policy styles than expected, leading Richardson (1982) to conclude that it was probably better to speak of a common West European policy style. Secondly and related, analysts pointed out that considerable differences between preferred policy approaches exist *within* political systems (Cairney, 2009), for example between regulatory and distributive policy sectors.

These shortcomings have to a large extent been addressed in more recent theoretical contributions. A new volume comprising analyses of policy styles across an unprecedented diversity of countries, which *do* show considerable differences between governments – has particularly helped to reconcile notions of national and sectoral styles (Howlett & Tosun, 2018). Embedding policy styles within broader 'policy regimes', Howlett and Tosun argue that overarching institutions and paradigms indeed result in the prevalence of national policy styles, while sector-specific institutional and paradigmatic features help to account for why national styles have more explanatory value in some sectors than in others (see also: Richardson, 2018).

A sector-specific feature that is considered a key determinant of the manifestation of archetype national policy styles in the European context is the degree of Europeanisation of policy sectors (Howlett & Tosun, 2018): national policy styles are expected to be more manifest and influential in sectors with no or low degrees of Europeanisation, whereas high degrees of Europeanisation are likely to result in more distinct sectoral policy styles, that share larger similarities across countries. Although this relationship between Europeanisation and policy styles has been hinted at before (Cole & Drake, 2000), the current evidence base is sparse, containing considerable ambiguity.

This paper contributes to this debate by further examining the Europeanisation-policy style nexus, addressing the question of *whether and how Europeanisation affects the degree to which features of an archetype national policy style are manifest within a sector*. We do so by exploring policy styles in the field of food policy. Whereas various crucial aspects of food policy have been harmonised at EU level, for others Member States have considerably more leeway. We focus on two sectors in particular: agricultural (high degree of Europeanisation) and (food-related) human health policy (low degree of Europeanisation), which we compare across three Member States: The Netherlands, the United Kingdom (England), and France.

In essence, our analysis shows that the degree of Europeanisation of a policy sector *does* prove an important condition that helps to understand the relationship between national and sectoral policy styles. More specifically,

we argue that Europeanisation has a stronger effect when sectors face a higher adaptation pressure, that is when there is a larger (potential) difference between sectoral regimes and EU-induced institutional demands, which challenges existing Member State institutions to the prevailing logic dictated by the EU policy direction. We show that in such a case, characteristic features of a national policy style are likely to become less manifest within a sector.

Policy styles and Europeanisation

Policy styles refer to the persistent forms of interaction and behavioural patterns that result in distinct ways of formulating and implementing public policies (Knill & Tosun, 2012; Richardson, 1982). By linking the policy process with the distinct political-administrative features of a polity, the policy styles concept helps to draw attention to the relatively enduring nature of policy-making arrangements (Howlett & Tosun, 2018). At the same time, the precise ways in which these ‘modus operandi’ connect with the broader institutional context was remarkably under theorised for some time. This lacuna has recently been overcome by a new conceptualisation proposed by Howlett and Tosun (ibid.), who make the inherent embeddedness of policy styles in broader regimes explicit by arguing that a policy style ‘is exercised within the constraints imposed by institutional arrangements [...] such as political and electoral conventions and institutions, as well as within a policy paradigm that shapes its content’ (p. 5). A policy style is then best thought of as ‘a set of political and administrative routines and behaviours heavily influenced by the rules and structures of the civil service and political system within which it is located’ (p. 10). Such an approach helps to explain both differences between *national* policy styles, resulting from differences in overarching institutional architectures, as well as between *sectoral* policy styles, resulting from sector-specific institutional and paradigmatic features.

In their initial typology, Richardson (1982) and colleagues discerned policy styles in Western Europe along two dimensions. The first dimension is about government’s dominant problem-solving approach and makes a distinction between whether governments approach policy problems in a relatively more active, forward-looking, *anticipatory* manner, or are relatively more *reactive* in confronting policy problems. The second dimension involves the relationship between government and society, which differs in whether governments strive for *consensus* or are relatively more *imposing* in their relationship with interest groups. Based on these key differences, they suggested the existence of four ideal-type West-European policy styles: the German ‘Rationalist Consensus’ Style, French ‘Concertation’ Style, British ‘Negotiation’ Style, and Dutch ‘Negotiation and Conflict’ Style.

Whereas Howlett and Tosun (2018) broadened these dimensions to make them globally applicable, our interest in (Western) European contexts means

we stick to the original Richardson dimensions to guide our analysis, while borrowing from Howlett and Tosun in acknowledging that these dimensions should be approached as scales. For the imposition-consensus dimension in particular, we integrate thinking in terms of degrees of *inclusiveness*, as even impositional policymaking generally involves a certain cohabitation between policymakers and *some* interest groups, while excluding others (e.g., see the work on ‘policy monopolies’ by the punctuated equilibrium scholarship).

The second concept that is central to our study, that of *Europeanisation*, has been used and measured in many different ways (Featherstone, 2003; Olsen, 2002), and is here understood as the impacts of the EU integration process on domestic policymaking (Börzel & Risse, 2003). While it goes beyond the scope of this paper to discuss the vast body of Europeanisation studies, a key insight from this literature is that the depth of impacts on domestic policy processes remains equivocal. Whereas many publications conclude that there has been profound Europeanisation of policy *content*, e.g., of instruments, while broader policy styles and administrative structures have remained remarkably resilient (e.g., Börzel & Risse, 2006; Jordan & Liefferink, 2004), other studies find much deeper and profound change of the latter as well (e.g., Jordan, 2003; Læg Reid et al., 2004). Scholars have suggested that, rather than an antithesis, these contrasting insights indicate considerable variation in depth and scope of Europeanisation between countries, sectors, and periods of time (Börzel & Risse, 2003; Harmsen, 1999). As an implication, the relationship between Europeanisation and policy styles may be more nuanced than suggested in the policy styles literature; with more or less space for national policy style features depending on the depth and nature of Europeanisation.

A helpful concept in this respect, is that of ‘adaptation pressure’, which results from misfits between EU demands and domestic policy regimes (Knill, 1998). Such adaptation pressure may emerge from two types of misfits: (i) policy misfits between EU and national legislation, and (ii) institutional misfits resulting from EU challenges of domestic rules, procedures and understandings (Börzel & Risse, 2003). The latter may occur as a result of formal implementation requirements (Knill, 1998), but can also come about through more indirect mechanisms, such as changing opportunity structures or policy learning, i.e., changing policy beliefs (Knill & Lehmkuhl, 2002). Scholars of EU Cohesion Policy have, for example, studied how the policy’s ‘partnership principle’ has changed the role of lower governments in national and EU policymaking through each of these three mechanisms (Bache, 2008). Building on this scholarship, our key expectation is that the higher the adaptation pressure a sector faces, i.e., the greater the misfits between EU-induced institutional demands or pressures and the existing sectoral policy regime, the larger is the likelihood of sectoral deviations from the archetype national policy style (cf. Graziano, 2011). As discussed above, we

study these (potential) deviations by looking at change and stability of the two Richardson dimensions.

Methodological approach

To analyse the interaction between Europeanisation and policy styles, we perform a comparison of two sectors in three countries: The Netherlands, England¹ and France. Together, these countries cover three of the four ideal-type policy styles from the original Richardson volume; allowing for exploring diverging adaptation pressures on sectoral regimes. We decided not to include Germany as its federal structure and associated dispersion of authority make the Europeanisation influences of being of too different nature to allow for meaningful comparison. In terms of sectors, we selected a highly Europeanised and (almost) non-Europeanised domain within the larger field of food policy, which is the authors' shared field of expertise. Our main comparison focuses on the – highly Europeanised – agricultural policy styles in the three countries. The second comparison, of (food-related) public health policy, primarily serves a control function, so as to prevent incorrectly attributing changes of sectoral policy styles to EU-induced adaptation pressure. Both these sectors are characterised by relatively humdrum policymaking with occasional flares of high politics.

As both sectors in practice cover a range of sub-sectors that are characterised by distinct policy styles, we make a further delineation based on two criteria (cf. Candel & Daugbjerg, 2020):

- Institutional delineation: the analysis is restricted to policies made and implemented by the national ministries responsible for agriculture and public health.
- Purpose-based delineation: the analysis is restricted to policies that have the explicit purpose of realising environmental sustainability (agriculture) and healthier diets (public health). Both these outcomes have been continuous priorities over the last decades, while the focus on agriculture's environmental improvement allows focusing on those policies where member states have most leeway under Common Agricultural Policy (CAP) legislation.

The cross country-analyses include three steps: (i) synthesis of the archetype national policy styles, based on the state-of-the-art literature; (ii) exploration of the EU-induced adaptation pressure per sector; and (iii) exploration of the consequences for sectoral policy styles along the Richardson dimensions. For steps two and three, we use a 'minimalist' form of process-tracing, aimed at constructing more general cause-outcome explanations (Beach & Pedersen, 2019). This type of process-tracing is particularly useful for this paper's theory-

building endeavour; allowing for new insights on the relationship between Europeanisation and policy styles that can inform future theory-testing studies.

Two main sources of data were used: (i) the key policy documents for each sector, and (ii) existing reports, publications and newspaper coverage (see Online Supplementary Material). In each sector, the most significant developments – including the introduction of new policies – were identified and key documents reviewed. For each sectoral case, the influence of European policy on policy content was identified, by comparing national policy developments to those in the sector at EU level (again identified through a review of significant policy developments at the European level). This allowed us to identify the main EU-induced adaptation pressures, which we thus studied at more generic levels (as compared to more detailed analyses, e.g., see Graziano, 2011). In addition, while reviewing reports and other literature on the policy sectors (which discuss how policies are made and the government-interest group relations involved during the development process), we noted any references to the policy process which spoke to the policy style associated with each sector. Particular attention was paid to whether activities and relations with stakeholders could be characterised by anticipatory/reactive or impositional/consensual characteristics. Combining these different data sources allowed for developing thick case reconstructions, which are generally considered an important first step in theory-building process-tracing (Beach & Pedersen, 2019; Biesbroek & Candel, 2020).

Developing policy styles in Dutch, English and French food policymaking

Policy styles in the Netherlands

Archetype

In the initial Richardson volume, the Dutch policy style was described as being in a state of transition. Van Putten (1982) argued that various styles could be distinguished: whereas the older ministries still tended to operate in an impositional manner, passing formal laws in cooperation between government and Parliament, the newer departments proved more inclined to what he dubbed 'effective' and 'efficient' problem-solving, recognising the differentiation of interests within society and engaging in more outward-oriented and collaborative forms of governing. The overall picture that emerged was one in which polyarchy and hierarchy were pushed aside by sectoral bargaining (ibid.). This development has continued in following decades. Indeed, the Dutch '*polder model*', an institutionalised mode of bargaining and consensus-seeking between government, labour unions, and employers that emerged in the 1980s and 1990s, is often portrayed as an archetype of

neo-corporatism (Andeweg, 2000). Following on the ‘new public governance’ agenda, this model has opened up to come to include broader networks of stakeholders, without fundamentally changing the dominant *modus operandi*. As such, the Dutch policy style can be characterised as consensual, informal, and horizontal (Wiering & Immink, 2006). A typically favoured instrument is the use of ‘voluntary agreements’ between government and industries (Schenkel, 2000). The use of more coercive instruments is generally considered a last resort option only. Additionally, the preference for consensus, as well as the need to bargain parliamentary majorities, makes the Dutch policy style highly reactive.

Agri-environmental policy

Dutch agri-environmental policy has been driven by two Europeanisation pathways. The first pathway involves environmental policy integration of the CAP, including the introduction of the Second Pillar for rural development (2000), cross-compliance with environmental and sanitary standards (2003), and the ‘greening’ of direct income support in the First Pillar (2013). As the Netherlands has traditionally been one of the Member States pushing hardest for greening the CAP, these changes caused no major policy misfits. Institutionally, the design and implementation of rural development plans was made a provincial responsibility, which fitted within a broader decentralisation trend (Van Straalen et al., 2016). Apart from engaging in EU level negotiations, the Ministry of Agriculture played a relatively modest role in agri-environmental policymaking; adopting an explicit policy not to top EU legislation with stricter national standards (WRR, 2014). Instead, successive agriculture ministers consistently emphasised that it is up to the agri-food sector itself to realise sustainability improvements, foreseeing only a facilitating role for government (e.g., Ministerie van ELI, 2011; Ministerie van LNV, 2005). Examples of private initiatives include the use of certification, animal welfare schemes and sector-led integrated quality and sustainability systems. Only recently, following on the need to reduce climate emissions and environmental impacts, the ministry adopted an ambitious, albeit largely symbolic, long-term strategy to move towards a system of ‘circular agriculture’ (*‘kringlooptlandbouw’*) (Ministerie van LNV, 2018).

A second Europeanisation pathway originates from EU environmental policy demands, most notably the Nitrates Directive, Water Framework Directive and Habitats Directive. These environmental policies have forced the agricultural ministry to coercively intervene in the agricultural sector in recent years; with the two clearest episodes in 2015–17 and 2019. In the period 2015–17, the abolishment of the EU milk quota resulted in a major expansion of the Dutch dairy production capacity. Under threat of losing derogation under the Nitrates Directive due to an increasing surplus of manure, the ministry forcibly intervened in the dairy market by obliging farmers to reduce

their stocks again. In 2019, the Dutch Supreme Court ruled that the government took insufficient action to prevent nitrogen deposition in Natura2000-protected areas, putting a hold on all ongoing permit applications for future construction. As the livestock sector is the main source of nitrogen emissions, the government has been developing a far-reaching policy package targeting the agricultural sector, inter alia buying out farmers surrounding Natura2000-areas. This has sparked large farmer protests and has driven a wedge between the ministry and agricultural interest groups.

These EU-induced interventions have meant a major shift of the sectoral policy style, especially regarding the dimension of impositional versus consensus-oriented policymaking. The agri-environmental policymaking had traditionally been dominated by a neo-corporatist policy regime, consisting of the ministry, farmer interest groups, and agricultural portfolio holders in Parliament (Frouws, 1993). Despite an increased use of public consultations, this policy bastion managed to survive for a long time (Termeer & Werkman, 2011). More recently, however, the government has had to give up its *laissez-faire* approach, taking forceful interventions without consent of the agricultural sector; marking an episode of impositional policymaking that is atypical compared to the national archetype (Candel, 2019). Additionally, whereas the role of the abovementioned focusing events show that policymaking largely remained *reactive* of nature, the ministry's recent Circular Agriculture vision may mark a cautious move towards a more forward-looking orientation.

Public health policy

The influence of the EU on Dutch healthier diets policy has been negligible. European influence on member state nutrition policy has been limited to the adoption of legislation on labelling and health claims, and the requirements of the school milk scheme (Roosen et al., 2019). The EU Strategy on nutrition, overweight and obesity related health issues (2007) and Action Plan on Childhood Obesity (2014) hardly impacted national policymaking. The Dutch Ministry of Health has acknowledged the relationship between food intake and public health since the early 2000s, but this has resulted in few substantive policy efforts (WRR, 2014). More generally, prevention has received much less priority than curative medicine (IGZ, 2012). Most interventions involve the use of information-based instruments, such as dietary guidelines. Additionally, the ministry has made frequent use of covenants with private actors, e.g., to reduce overweight (2010) or to improve food product compositions (2014). More recently, attention to prevention has somewhat increased, as shown by the appointment of a separate State Secretary for prevention and the signing of the multi-stakeholder 'National Prevention Agreement' in 2018. This agreement aims at offering healthier food in schools,

hospitals, and canteens, reducing sugar in food products, and the introduction of a new healthy food logo.

The policy style in governing prevention within the Ministry of Health has closely resembled the archetype national style. Whereas successive ministers and state secretaries have acknowledged that making healthy food choices in an obesogenic environment is difficult, they have consistently stressed that the responsibility for making ‘the right choice’ lies with consumers themselves (WRR, 2014). The few substantive attempts at governing have been characterised by the inclusion of a broad range of stakeholders, including the food industry, and the pursuit for *consensus*. The process towards the adoption of the National Prevention Agreement provides a good illustration of this pattern: the agreement was designed in a series of roundtables with representatives of health organisations, NGO’s, municipalities, insurance companies, retailers, and the food industry, including *Coca-Cola* and *Unilever*, and was delayed due to disagreements between stakeholders. The process and final outcomes received considerable criticism from academics and civil society (e.g., RIVM, 2018; Toebes et al., 2019), some of whom argued that regulatory capture had resulted in the adoption of a largely symbolic covenant that lacked interventions that had proven effective in other countries, such as a sugar tax on sodas. Earlier interventions, in a similar vein, largely relied on self-governance arrangements, such as the use of private logos and labels and covenants about product composition.

Policy styles in England

Archetype

Recent years have witnessed a prolific scholarly debate on the nature of the *English* policy style (Cairney, 2009; Jordan & Cairney, 2013; Marsh & McCaffrie, 2015; Richardson, 2018). The rapid succession of analyses and responses shows that characterising (changes in) the main features of the UK government has proven challenging. Whereas the Westminster style has traditionally been characterised as an archetypal majoritarian system with top-down governing, Richardson and Jordan (1979) already warned that a distinction should be made between salient decisions taken at the highest political echelons, and more ‘humdrum’ policymaking processes within subsystems. These latter are the more technical and specific details of policy which often tend to be more pragmatic and consensual, particularly during implementation. This decision-making takes place often beyond government departments and through the ‘delegated governance’ that operates across a large ‘hinterland’ of Non-Departmental Public Bodies with attendant interest groups (Flinders, 2008). Richardson’s (1982) archetype therefore rejects the impositional majoritarian caricature in favour of a ‘consensus and negotiation’ policy style, characterised by predilection for consultation,

avoidance of radical policy change, and avoiding actions which challenge entrenched interests. Later analyses have noted the continuation of this consensual archetype over time, despite appearances of more stereotypically impositional policymaking at a high politics level, for example the Thatcher years, obscuring more consensual relations at the humdrum level (Cairney, 2018). That said, Richardson (2018) does argue that as a result of austerity politics, a move towards addressing budget deficits, and changes in ministerial-civil service relations, the English style has moved towards a more impositional style of 'constrained consultation'; meaning that consultation still takes place but its scope is bounded by decisions made at the higher echelons of government and its departments.

Agri-environmental policy

England's agri-environment policy was led by the pressure to adapt to the CAP and its support payments. From the inception of the CAP's agri-environmental schemes, the UK rapidly became a lead state in this policy area at EU level (Jones & Clark, 2001), reflecting the UK government's high 'adaptation capability', as they rationalised and accepted the logic of these schemes. The early, targeted agri-environmental schemes were the EU led Environmentally Sensitive Areas (1987), supplemented by the national led Countryside Stewardship Scheme (1991). These schemes evolved into the post-2005 CAP Pillar II Environmental Stewardship payments. The environmental direction of agricultural policy was symbolised in 2001 with the replacement of the Ministry for Agriculture, Fisheries and Food (MAFF) – considered a classic example of a Department promoting the needs of its clientele interest groups in the farming industry (Smith, 1990) – with the Department for Environment, Food and Rural Affairs (Defra), with its expanded policy remit. This change reflected increasing societal and scientific based critiques over productivist agricultural practices and their damage to the natural environment (Pretty, 1998), with reform championed by campaigning environmental and nature conservation NGOs; thus, bringing these groups into a more inclusive network on agri-environmental policy (Jones & Clark, 2001). However, the government kept the National Farmers Union and Country and Landowners Association central to these policies in England, making these groups more included than others, promoting their role as stewards of the largely farmed countryside (ibid.).

As with the Netherlands, EU environmental directives (e.g., water, nitrates, habitats and pesticides) addressed more specific adverse agricultural practices in England. In the case of nitrate pollution of water, English policy had begun to implement inspection and controls due to privatisation of the water industry, prior to the adoption of EU legislation (Knill & Lehmkuhl, 2002; Lowe et al., 1997). However, the implementation of the 1991 Nitrates Directive in England was relatively weak focusing only on key drinking

water catchments, easing the pressures upon the polluting farming sectors. Subsequently, in 2000, the European Court of Justice (ECJ) ruled for closer national compliance to the directive (Efra Committee, 2008). The ECJ's intervention increased the adaptation pressure moving the government to extend Nitrate Vulnerable Zones and the conditions for compliance across larger areas of England (ibid), forcing a more impositional policy upon the government in relation to the affected core agricultural interests.

While the English policy style has accommodated a wider range of interest groups in its agri-environmental policy formulation and implementation, the key groups remain the farmers and landowners as the stewards for delivering agri-environmental policy. In 1989, the Agriculture Minister had talked of the possible role of public goods provision by farmers through agricultural subsidy (Jones & Clark, 2001, p. 112). Three decades later, this has become the core of the post Brexit agricultural support policy (UK Parliament, 2020). Defra has advanced a policy for continued payments for public goods, focusing on targeted environmental land management schemes, placing the support of ecosystem services as the key to agricultural support. That is, support for farmers and landowners subject to a longer-term reduction in budgetary costs (Coe & Finlay, 2020). Alongside the dynamics of interest group accommodation in agri-environmental policy, the policy style has evolved, to one of 'constrained consultation'. In 2018, a very wide public consultation over the future of English agricultural policy post-Brexit, garnered 43,356 responses with a series of regional consultation events held around England (Defra, 2018). However, the options were already laid out by Defra in its consultation paper, the policy direction largely set (ibid), while the consultation provided a means for policy dissemination and validation from the centre to the wider sets of stakeholders. In turn, more discrete and detailed consultation followed over options on how to implement the new schemes (Defra, 2020).

Public health policy

As in the Netherlands, European influence on English nutrition policy has been limited. Indeed the UK's implementation of Traffic Light Labelling went further than the suggested EU approach (Roosen et al., 2019), and the sector is therefore characterised by low adaptation pressure. Health policy began to address food in earnest in the early 2000s with government action in response to emerging nutrition issues such as obesity focused primarily on less impositional policy instruments, such as consumer information, and a framing emphasising individual responsibility (Koutoukidis & Jebb, 2019). A subsequent shift to public-private partnership instruments (Parsons et al., 2018), expanded emphasis beyond the individual to corporate responsibility. The relationship between government and key food industry stakeholders remained consensual, e.g., resulting in the 2011 Public Health Responsibility

Deal (PHRD) set of voluntary pledges around reducing ingredients like salt and fat, encouraging fruit and vegetable consumption, and putting calorie information on menus (Parsons et al., 2018). This inclusive approach to food industry interests is evidenced by criticisms of the PHRD from academics and civil society for low ambition, lack of monitoring, and a lack of sanctions (Panjwani & Caraher, 2014). However, the beginnings of a more top-down impositional approach can be detected in the creation of a School Food Plan (2013), which instigated a new set of food standards and the introduction of government-funded universal infant free school meals (Roosen et al., 2019). Since 2016, a Childhood Obesity Plan has acted as an umbrella policy for a gradual but significant shift towards harder interventions, including the introduction of a sugary drinks industry levy, and controls on advertising of high in fat, sugar or salt (HFSS) products (Knai et al., 2018).

This more recent trend towards harder, more interventionist, policy instruments suggests a deviation from the more consensual and reactive tradition in the sector. This chimes with Richardson's (2018; p. 1) thesis on the country's long-term trend to 'move policymaking from the private management of public business back into a more public sphere', resulting in a reduction of power for business. Product reformulation provides a useful example: early voluntary policy instruments involved a close relationship with supply chain actors (Panjwani & Caraher, 2014), but a change in approach is evident with the sugary drinks levy announced in 2016, where pushback from industry (Sustain 2018) suggests a more top-down, less consensual approach. For Knai et al. (2018, p. 2), for example, these 'demonstrate that the government recognises the powerful influence of commercial players, and signals that it is prepared to place the health of children over commercial interests'. As in the agricultural policy domain, the traditional consultative approach associated with the country's policy style has continued, but the inclusion of harder policy instruments such as a sugary drinks levy, and possible legislative bans on advertising of particular foods, within the Childhood Obesity Plan (Department of Health, 2016), suggest the policy direction is largely set.

Policy styles in France

Archetype

In the original chapter in the Richardson volume, Hayward (1982) characterised France by its 'dual policy style', combining 'heroic' and 'humdrum' decision-making. Heroic decision-making, also referred to as *dirigisme*, relates to the tradition of anticipatory and impositional state interventions following from the belief that free markets do not produce socially optimal outcomes (Calef & Goble, 2007). A classic example of dirigisme are the '*grand projets*' – nuclear power, the TGV, aviation – of the 1970s and 1980s. At the same time, French policymaking is characterised by more consensual sectoral styles, embedded

in meso-corporatist regimes (Szarka, 2006). Szarka (2004), drawing on Muller and Saez (1985), distinguishes three characteristics of this '*corporatisme à la française*': (i) sectoral interest representation, monopolised by a single lobby; (ii) close relationships between parts of the administration and sectoral interests; and (iii) the capacity to exclude other, non-economic interests and governmental actors. These features have been well-documented for agricultural and environmental policy sectors, whereby it has been suggested that technical, supply-side solutions are favoured over social innovations, such as changes of consumption practices (Szarka, 2006). Although it is sometimes suggested that the French *modus operandi* has shifted towards a more consensual style, this seems more a change of emphasis than a radical departure from the past (cf. Calef & Goble, 2007).

Agri-environmental policy

Influenced by a vocal agricultural lobby, arguing that agri-environmental policy would be an offense to farmers' professional identity and harm the productive agricultural model, the French government for a long time resisted the proactive development of agri-environmental schemes (Alphandéry & Billaud, 1994). This changed with the introduction of the rural development pillar in the CAP; although the left-wing Jospin government initially aimed to decentralise agri-environmental policy to the *départements*, the Ministry of Agriculture eventually seized on the CAP institutional demands for strong oversight and accountability to take firm charge (Brun, 2006). Ansaloni (2011) in this respect argues that EU-induced institutional demands connected with a tradition of impositional and centralised steering, starting off a period of relatively strong agri-environmental governmental steering. Adaptation pressures following from the early development of EU agri-environmental policy thus proved to be limited.

This explains why French agri-environmental policy markedly differs from the Netherlands and England, in the sense that relatively extensive national programmes have been developed *in addition* to EU measures. For example, at the start of the government's involvement, a 1999 law on the multifunctionality of farming allowed for entering five-year contracts with individual farmers to improve natural resource management in agricultural practices. Despite the programme's success, it was abolished in 2002 and replaced by a less ambitious agri-environmental programme in 2006, which primarily aimed to promote extensive breeding and crop rotation. In addition, various voluntary schemes were set up to stimulate organic agriculture, low-input breeding and promote water quality and bird protection initiatives (Fouilleux, 2008). Sustainable food production got a renewed push through the 2009 *plan Barnier*, which contained measures to facilitate the development of 'short supply chains', e.g., through use of public procurement and by promoting direct farm sales. After the election of a new, social-democrat government,

a new agri-environmental policy was adopted in 2012, referred to as the '*Projet Agro-écologique*'. This programme aimed for a transition towards agro-ecological farming practices at both national and EU levels (Le Foll, 2013). However, due to the almost exclusive use of information-based instruments, without substantial regulation or financial incentives, the programme remained largely symbolic (Arrignon & Bosc, 2017). This is characteristic of French agri-environmental policy in the most recent period: whereas the government has put much emphasis on greening agriculture, particularly by promoting extensive livestock farming, organic agriculture, certification, and reducing the use of pesticides, measures remained largely voluntary; which is why they have remained largely unopposed by farmer unions.

The relative absence of more impositional steering is for a large part explained by the limited success of the French government's pushes at EU level, which received insufficient support among other Member States to move forward with the agri-environmental agenda. Due to the relatively weak competitiveness of many French farmers, this put a break on domestic policy preferences. Consequently, while the French agri-environmental policy style has many of the national archetype's anticipatory features, these remain largely restricted to paper realities. In terms of openness, the sectoral style exhibited a gradual shift towards increased inclusivity over time. Successive ministers of agriculture showed willingness to approach sustainability concerns in a more holistic manner, e.g., by collaborating with the Ministry of Environment on specific programmes and by consulting a broader range of stakeholders. At the same time, many of the traditional neo-corporatist characteristics have remained in place. Farmer interest groups continue to have a large influence on policy design processes. This ostensible paradox follows from the relative shallowness of recent consensus-oriented arrangements. The 'National Food Conference' (*États Généraux de l'Alimentation*; EGA) provides a clear example in this respect. The EGA was established in 2017 by president Macron to involve a broader range of stakeholders in food and agricultural policymaking. The initiative brought over 700 stakeholders together and received more than 17,000 written letters. Although the EGA was followed by a Food Law in 2018, many recommendations were not translated into substantive interventions. Instead, the government explicitly shifted the responsibility for implementing some of the outcomes of the EGA towards the private sector. For example, the EGA's call for a ban on glyphosate by 2021 was not included in the law on the premise that there were no alternatives to pesticides. Instead, responding to calls from the largest farmer union, the Minister of Agriculture signed a covenant with 42 agribusinesses to reduce pesticides on a voluntary basis, without measurable targets. The overall picture that emerges is one of symbolic anticipation, and an increase of, often well-intended, collaborative arrangements, whilst most decisions, and non-decisions, continue to be made in a centralised

manner, with persistent co-management between the Ministry of Agriculture and the agricultural sector.

Public health policy

As in the other two countries, food-related public health policy has been almost entirely driven by domestic policy preferences, with hardly any EU-induced adaptation pressures. The attention to food in French public health policy can be traced back to the late 1990s and early 2000s. Until that period, the role of prevention had largely been neglected in favour of curative approaches (Bergeron & Nathanson, 2012). In 2001, the Ministry of Health developed the National Health Nutrition Program (PNNS: *Programme National Nutrition Santé*) to improve health outcomes by focusing on the nutritional quality of diets. The PNNS introduced dietary guidelines (*repères alimentaires*) and media campaigns to disseminate these. The adoption of the PNNS marked an important change in food policy, as until that point all food policy actions had fallen under the responsibility of the Ministry of Agriculture. After the adoption of the PNNS, various follow-up initiatives were adopted, including the removal of food vending machines from primary schools (2004) and the signing of a public-private agreement with the agri-food sector to improve the nutritional content of processed foods (2006). The government adopted a – relatively low – flat-rate tax on sugary drinks in 2011, which was changed to a more substantial tax varying on sugar content in 2018 (Le Bodo). Another major step followed in 2016, when the government adopted the Nutri-Score labelling system to indicate the nutritional quality of food products. The label is voluntary for food producers and retailers to use, but has rapidly diffused (Mialon et al., 2018). The most recent version of the PNNS has moved beyond individual-targeted responses by recognising the role of social inequalities and obesogenic environments in unhealthy lifestyles (HCSP, 2017).

This policy change trajectory shows that France's nutritional policy style has been relatively anticipatory in the previous two decades. Policy design has been largely centralised, with a strong influence of an epistemic community of public health experts. The Nutri-Score labelling system was, for example, developed by nutrition scholars and, after an extensive stakeholder consultation, subsequently embraced by the Health Ministry. The influence of the private sector has generally remained more limited compared to agricultural policymaking. Moreover, whereas early nutrition interventions were characterised by relative voluntariness, recent years have seen a shift towards some more impositional government intervention, as shown by the adoption of the sugar tax and mandatory information in food advertisements. Whereas the food industry has strongly opposed Nutri-Score, the government decided to pursue the system nonetheless (Julia & Hercberg, 2018). The increased use of public consultations suggests increased inclusivity of

policymaking, but these have largely been organised for the sake of appearance, as these have had relatively little influence on policy drafting and decision-making (cf. Goffi, 2019). *Within* the national government, food policymaking has gradually broadened up, as shown by increased collaboration between ministries. The Nutri-Score implementing decree was, for example, co-signed by the ministries of health, agriculture, and economic affairs in October 2017.

Discussion

Recent scholarship has suggested that sector-specific institutions and paradigms can help to understand why national styles have more explanatory value in some sectors than in others. In the European context, the degree of Europeanisation of sectors has been put forward as a sector-specific regime condition that may be of particular relevance. This paper has questioned whether and how Europeanisation affects the degree to which features of an archetype national policy style are manifest within a sector through an exploratory comparison of agri-environmental and food-related public health policy in the Netherlands, England and France.

When comparing our findings across countries and sectors, notable differences in the degrees to which sectoral policy styles match with the national archetypes can be observed. Broadly speaking, the development of policy styles in England showed the largest similarities, both between the two sectors and in relation to the national archetype. This development can best be described as one towards 'constrained consensus' where the government sets a clearer policy direction while seeking to carry along the longer established sectoral interests in the policy area, confirming Richardson's (2018) earlier observation. In both sectors, there is a strong role for Non-Departmental Public Bodies, which contributes to the spaces for informal interactions between public and private actors and at policy implementation (cf. Knill, 1998). For the Netherlands, on the contrary, a large difference between agri-environmental and public health policy could be observed. Whereas the latter largely corresponded with the national archetype of reactive and consensual policymaking, the former was characterised by an increase of imposition and a slightly more future-oriented orientation. The recent implosion of the agricultural neo-corporatist regime, accompanied by growing mistrust and polarisation, is highly uncommon within the Dutch 'polder model'. The picture that emerges for France is somewhere in between: for both sectors, a tendency towards an increased emphasis on consultation was found, albeit an even more 'constrained' form of consultation than in the English case, with government willing to predefine general policy frameworks. However, whereas policymaking in both sectors proved relatively anticipatory, in the agri-environmental domain this did not really

proceed beyond 'symbolic anticipation', i.e., drafting long-term visions and plans.

Interestingly, and much in line with our theoretical expectation, these findings can well be related to the adaptation pressures stemming from Europeanisation influences. In the English case, this pressure proved relatively limited with regard to agri-environmental based subsidy payments; where policy could reward the established clientele interests, reinforcing the UK's overall adaptation capability (Knill, 1998). Conversely, where EU policy unsettled those interests, as with the Nitrates Directive, a stronger European push and subsequent national government imposition was required to meet the policy ends sought. For the Netherlands, the shift towards a more interventionist approach in the agricultural domain proved a direct result of EU legislative pressures. Non-compliance with the EU Nitrates and Habitat Directives meant that the agricultural ministry had to forcefully intervene in the livestock sector, albeit forced by the Dutch Supreme Court. France proved quite unique in developing relatively extensive national agri-environmental programmes in addition to the CAP, for which the agricultural ministry had seized on the institutional opportunities offered by the CAP. At the same time, although French agri-environmental policy proved more anticipatory than that in the other two countries in this respect, the need to develop these initiatives within the confines of European legislation made these efforts less substantive than may have been the ministry's preference in all likelihood. Especially when compared to the public health sector and national archetype, the Europeanisation influences seem to have slightly pressured the sectoral policy style towards the more reactive end of the spectre. For food-related public health policy in all three countries we found Europeanisation-related adaptation pressure to be virtually non-existent. This may explain why the development of sectoral policy styles generally corresponded with the national archetypes as these emerge from the scholarly literature.

The above is by no means to say that Europeanisation in itself *fully* explains stability and change of sectoral policy styles; our exploratory research design does not allow for making such claims. It does, however, suggest that the degree of Europeanisation, and particularly the existence of adaptation pressure resulting from misfits, plays an important role. As such, our study confirms much of the earlier Europeanisation research by Knill (1998), Harmsen (1999), Börzel and Risse (2003) and others, by showing that the depth and scope of Europeanisation influences is very much context-specific. Consequentially, rather than attributing causal force to Europeanisation as a single independent variable, we believe there is merit in further exploring causal complexity, i.e., the configurations of conditions under which Europeanisation may have explanatory value. For example, in the Dutch case, Europeanisation effects only came to be felt after two focusing events drew attention to agriculture-related environmental problems. We

would therefore invite Qualitative Comparative Analysis (QCA) type of research to expand our findings towards a larger set of conditions and contexts.

The Dutch example also explains why policy styles in all three countries seem to have become more impositional (cf. Richardson, 2018), particularly also in the public health domain. For Richardson, many of the problems that Western-European societies face are 'so severe that they demand that some existing policy-making modalities to be set aside, however well-established they might appear' (Richardson, 2012, p. 312). Richardson (2018) has explicitly referred to climate change and obesity – key issues in the policy sectors in our case studies – as urgent and complex problems that may require more forceful governmental intervention, challenging existing policy styles.

Altogether, despite being subject to regular scholarly contestation, the policy styles concept continues to be an insightful approach to explain stability and change of policymaking patterns across countries and sectors, as well as over time; particularly when embedded in broader institutional contexts. Whereas until recently, remarkably few efforts at empirically applying the concept had been undertaken, the renaissance of research on the topic will result in a better understanding of divergences and convergences in policy designs, and as such provide leverage points for improved policymaking.

Note

1. The case study focuses on England – rather than the United Kingdom – because both agriculture and health are devolved responsibilities, meaning Scotland, Wales and NI have their own distinct policy approaches. However, because England itself does not have a devolved administration, and policy in other sectors is made on a UK-wide basis, England is often referred to as the 'UK government'.

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