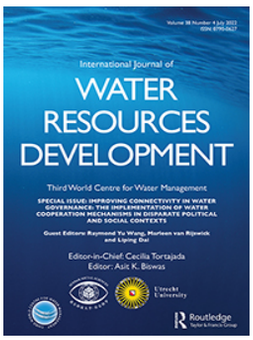

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The politics of practical implementation: reloading of information by competing coalitions in EU water governance

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ABSTRACT

More open European Union policies, such as the Water Framework Directive (WFD), are often shaped on the go. 'Bottom-up' feedback from the implementing agencies plays an important role. How this feedback influences ongoing policies is here conceptualized as 'reloading'. The case for the reuse of water is presented. International coalition-building proved to be important in agencies' strategic behaviour: a clear dichotomy between Northern and Southern member states is distinguished. The receptiveness of the European Commission, the openness of the European Union policies, and societal and political attention to the issue of reuse all explain the changes in water reuse policy.

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Implementation; feedback; Water Framework Directive; water reuse; Common Implementation Strategy

Introduction

Politics do not stop after the policy decision-making process but continue during the stage of practical policy implementation (Majone & Wildavsky, 1978; Matland, 1995). Policies evolve as they are implemented (Majone & Wildavsky, 1978). Yet, in European Union (EU) studies, policy implementation is often tied to a distinguishable phase of 'translating policy into action' (Barrett, 2004, p. 251; Treib, 2014). In practice, the policy process, including the stage of implementation, can be seen as a dynamic and iterative process, instead of a straightforward sequence of stages or a simplified policy cycle. These dynamics can partly be explained by policy feedback based on experiences with policy implementation (Breeman & Zwaan, 2009). Policy actors, such as national administrations, can strategically introduce such implementation expertise to the EU policy process on multiple occasions. Such policy feedback processes in the EU setting have been acknowledged in political sciences and public administration, but have rarely been addressed systematically in EU (implementation) studies (Breeman & Zwaan, 2009; Treib, 2014). Although not often scrutinized academically, EU governance contains many practical examples of reloading processes. In the domain of water governance, the implementation of the EU Water Framework Directive (WFD) (Directive 2000/60/EC) provides an example. The WFD is a goal-oriented framework directive that has been refined 'on the go', based on several implementation experiences (Van Eerd et al., 2018).

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There is abundant scientific information on how EU policies come about. For example, it is known how agents strategically 'upload' their policy ideas and preferences to shape EU policy outcomes (e.g., Börzel, 2002; Kaika & Page, 2003; Liefferink & Andersen, 1998). Furthermore, many studies focus on how these EU policies might be transposed, implemented and moulded, or in other words 'downloaded' to the domestic situation (e.g., Falkner & Treib, 2008; Mastenbroek & Kaeding, 2006; Treib, 2014). In contrast, less is known about how knowledge and experiences concerning practical implementation feedback into European policy processes, that is, in renewed stages of agenda-setting, policy formulation and decision-making.

Moving beyond traditional literature concerning uploading and downloading, this article conceptualizes the feedback of experiences with policy implementation as 'reloading' and visualizes the EU policy process as an iterative and dynamic spiral (Figure 1).

As shown in Figure 1, agents acquire specific knowledge and experiences during the implementation phase (e.g., regarding the WFD). They feed this information back into processes of (possible) policy adjustments at the EU level. Such expertise, from (sub-) national actors, is used as a strategic resource for seeking access to and for influencing the ongoing EU policy process. Following their interests, preferences and policy objectives, actors can 'reload' their expertise both to preserve the status quo or to advocate specific policy changes (Breeman & Zwaan, 2009; Kingdon, 2014; Radaelli & Kraemer, 2008). We have shown in earlier studies that there are different strategies used in such feedback: agents can use combinations of framing, venue exploitation, timing and relational management strategies (Van Eerd et al., 2018). It also became clear that actors need to collaborate with like-minded agents to gain support, agglomerate resources and coordinate mobilization activities in the complex multilevel and multi-actor EU policy setting. Collaboration for reloading is necessary because powerful coalitions have a greater capacity to set the EU agenda, mobilize implementation experiences and therefore to change policies or prevent change from occurring (Mintrom & Vergari, 1996; Sabatier & Weible, 2007; Van Eerd et al., 2018). This article aims to gain a better understanding of these reloading processes, in particular

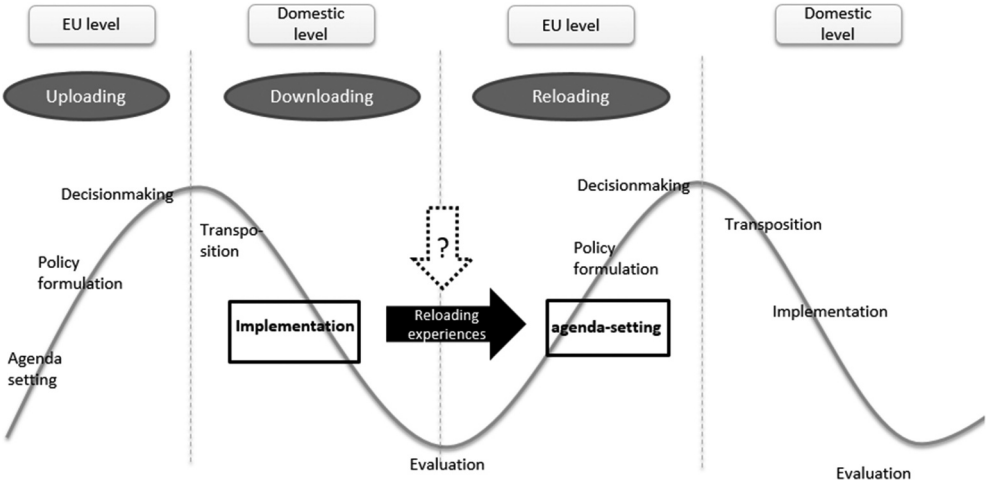

Figure 1. The European Union policy process spiral: uploading, downloading and reloading.

regarding the *interaction between coalitions* that use implementation experiences competitively: the ones which advocate policy change or the ones that argue to maintain the status quo. This article, therefore, addresses the following question: What role do competing actor coalitions play in reloading implementation experience in EU water governance?

The remainder of the paper is structured as follows. In the next section, reloading, strategic agency behaviour and coalition-building are further conceptualized. The third section describes the research approach used in the empirical analysis and explains the motivation for the selection of the water reuse case in the policy domain of EU water governance. With water reuse as a single case, the fourth section explores the competition between coalitions in reloading processes. The fifth section reflects and concludes.

A theoretical account: reloading and coalition behaviour

To conceptualize these processes of strategic agency behaviour, and the role of competing coalitions, theories of the policy process (from public administration and political science studies) have been inductively reviewed. In particular, theories on policy feedback, policy learning, policy implementation and the agenda-setting literature appeared relevant. A combination of insights from these different strands of the literature provides the analytical framework described below, the key building blocks of which have been steering the explorative, empirical analysis.

Reloading and policy change

As previously explained, new knowledge of and experiences with the implementation of EU policies may lead to policy adjustments or substantial changes in ongoing policies or to maintaining the status quo. The concept of reloading is defined as the process by which implementation experiences acquired by implementing agents during policy implementation are strategically used to influence the ongoing EU policy process.

Policy processes, more generally, are often characterized by stability and incrementalism, but occasionally show fundamental shifts from the past (Baumgartner & Jones, 1993; Dudley & Richardson, 1996). We acknowledge that it is unlikely that knowledge and experiences acquired through ongoing policy implementation play a significant role in more *radical* types of policy change, which are rare anyway (Hall, 1993), except for cases where scandals or 'shocks' emerge during the practical implementation. To understand more *incremental* changes of policy, we argue that the reloading of practical implementation knowledge is an important factor to consider (Baumgartner & Jones, 1993; Sabatier, 1998; Streek & Thelen, 2005). An agent's interest in reaching a certain dimension of policy change (e.g., instrument calibrations, changes to a policy's objectives and goals) or, in contrast, in maintaining stability, affects its incentive for reloading. For example, a gap in regulation (a regulatory void) experienced throughout implementation, which however fits an agent's domestic setting and preferences, is not seen as problematic and creates no need to reload to the EU agenda. Yet, when such a void hinders an agent's daily practices, reloading is expected to occur.

Agents' strategic reloading

In practice, numerous actors are involved in the implementation of EU policies, ranging from public to private and NGO actors (Head, 2008). This study focuses on implementing agents, which are professional organizations formally tasked with the practical implementation of a specific policy instrument at the local, regional or national level. Of all the agents involved, implementing agents have direct access to practical policy implementation and interact directly with a policy's target group. Hence, implementing agents have an information advantage in comparison with other actors and can use the acquired implementation experiences as a strategic resource to influence the EU policy process. In EU water governance, these agents are very often (semi-)governmental actors, such as ministries, subnational authorities and regional water authorities.

Scholars stress the crucial role of agency in policy processes (Hegger et al., 2014; Kingdon, 2014; Meijerink & Huitema, 2010a; True et al., 2007). Agents act strategically in the EU policy process by identifying and exploiting opportunities and by overcoming limitations imposed by their context. Van Eerd et al. (2018) confirm that reloading agents often apply a combination of traditional (agenda-setting) strategies: (1) framing, that is, using narratives, rhetoric, symbols, best practice and crisis exploitation; (2) relational management strategies, that is, networking, trust and coalition-building; and (3) venue exploitation, that is, venue shopping, creation or manipulation (e.g., Meijerink & Huitema, 2010a; Princen, 2007). Hence, following their interests and preferences, actors can bring forward domestic knowledge about policy implementation in an attempt to maintain the status quo and stabilize policies – or advocate policy changes (Kingdon, 2014; Radaelli & Kraemer, 2008). Schematically, we distinguish between two groups of actors: the ones who would like to maintain the status quo and those who desire to change the content or important procedures within EU policies and implementation (Kingdon, 2014; Meijerink & Huitema, 2010a; Sabatier, 1988; Zahariadis, 2007). Both groups of actors might reload policy implementation knowledge strategically to favour their incentives and policy objectives.

Coalition-building in processes of reloading

As reloading actors are generally unable to accomplish a successful mobilization of implementation knowledge alone, actors have strong incentives to ally with others to gain sufficient attention and support, and to coordinate activities (Mintrom & Vergari, 1996; Zito & Schout, 2009). Collaboration has two main advantages: (1) actors in different positions may draw on a different arsenal of strategies and expertise to influence the policy process; and (2) irrespective of actors' positions, they may have different capacities, resources and skills, which can be amalgamated and coordinated to increase a coalition's power and its capacity to set the agenda and to affect the policy process (Meijerink & Huitema, 2010a; Sabatier & Weible, 2007).

There are several types of coalitions. They may, for instance, be either tightly or loosely organized, ad hoc or relatively stable over time, or take a national or transnational form (Béland & Cox, 2016; Weible et al., 2009). Meijerink and Huitema (Meijerink and Huitema, 2010b) identify three types of coalitions based on their commonality. The first comprises actors who share certain ideas, beliefs and convictions related to a particular discipline,

such as environmental coalitions; their main activity is the advocacy of a particular set of ideas. The second type of coalition is a strategic alliance between agents who do not necessarily share the same beliefs, values or views, but who have the same interest in realizing a particular sort of policy change or stability. The third is coalitions whose parties share neither beliefs nor policy preferences, yet are dependent upon each other to realize their different objectives.

Coalitions of agents compete with one another and behave strategically to influence the EU policy process. Technical information about the practical implementation of EU policies is an important resource for these coalitions in gaining influence at the EU level and in steering the discussion (Sabatier, 1988, 1998; Sabatier & Weible, 2007). Connecting these theoretical insights with the aim of this paper, we consider what the specific role of coalitions is in reloading processes, how these coalitions reload expertise and insights concerning domestic implementation, and how they competitively interact to achieve policy change or stability.

Research approach

To further explore the role of coalition-building and the competitive interaction of coalitions in reloading processes, an empirical study was undertaken, which is elaborated upon in this section.

Case selection

The policy process of the WFD has been selected as the EU governance field under scrutiny. This is an ambitious framework directive for the protection of all European waters, aiming to achieve a good chemical and ecological water status. This directive also addresses water quantity management, as this is relevant for securing good water quality and for sustainable water use (Boeuf & Fritsch, 2016; Boeuf et al., 2016; Directive 2000/60/EC; Kaika & Page, 2003). Since its establishment in 2000, the WFD has given rise to several implementation challenges (Bourblanc et al., 2013; Liefferink et al., 2011). To deal with such implementation issues, the Common Implementation Strategy (CIS) was developed in 2001. This key EU water institution aims to operationalize the WFD to resolve technical controversies and allow for a more coherent implementation throughout the EU (Boeuf et al., 2016; Santbergen, 2013). The CIS functions as a unique network with several venues for the exchange of implementation experiences between the European Commission, member states, NGOs and other stakeholders.

Building upon earlier work, a process-tracing analysis of the WFD's policy process based on about 50 interviews and a comprehensive document study, we have identified many cases of reloading. From these cases, the issue of water reuse was selected, which is further explained in the next section, for consideration as a single case in this research. By focusing on water reuse, we expected that attempts and strategies to build reloading coalitions would be high due to the large divide in interests between Northern and Southern member states. Moreover, this specific case concerns a recent feedback moment; much implementation discretion can be identified in this case, it involves two identifiable and contrasting coalitions, data are available for all iterative steps taken, and there was a strong role for implementing agents. As this study is one of the first focusing

on reloading, and it is the first to do so concerning competing change and status quo coalitions, insights derived from a most likely case will be useful. The exploratory approach chosen allows studying in-depth the contemporary phenomenon of coalition-building in processes of reloading in the case of water reuse. To systematically assess this case, three questions, in line with the central research question and theoretical account, were formulated:

- What implementation knowledge is at stake?
- How is such expertise reloaded across multiple levels?
- Which competing coalitions can be identified in this reloading process and what are their roles, strategies and activities?

Data analysis

The analysis of the water reuse case is specifically based on 24 additional semi-structured interviews with staff members of the European Commission, implementing agents, and member state and stakeholder representatives in the EU policy process. A detailed overview of interviewees can be found in Appendix I in the supplemental data online. Interviews were held between August 2016 and September 2017, lasted from 45 minutes to over two hours, were audio-recorded and fully transcribed. Another important data source was relevant policy documents, such as CIS guidance documents, research reports of the EU's Joint Research Centre (JRC), and minutes of meetings and presentations of EU working, expert and strategic groups that are publicly available via CIRCABC. Content analysis of the documents and interview transcripts was done by applying deductive coding based upon the theoretical conceptualizations described above (e.g., type of coalition and interest triggering reloading)

The case of water reuse: reloading and competing coalitions

The issue at stake

While the demand for freshwater increases, for example, from industry and agriculture, longer and more intense periods of drought are expected in the future due to changing climatic conditions (IPCC, 2013, 2014). The frequency and duration of periods of drought have dramatically increased in Europe over the past 30 years. These droughts have an impact on public health, ecosystems and the economy of the European Community (European Commission, 2007, 2016a; Sanz & Gawlik, 2014). At present, Southern member states (i.e., Cyprus, Spain, Malta, Portugal, Greece and Italy) in particular suffer from these droughts. The reuse of water can be seen as a solution because it provides a reliable water supply despite seasonal droughts and weather variability. It also requires lower investment costs and energy compared with alternative solutions (interview 1) (Angelakis & Durham, 2008; European Commission, 2016a; Kaika & Page, 2003; Sanz & Gawlik, 2014). 'Water reuse' refers to the 'production of water through water treatment processes which

introduces a feedback loop in the water cycle' (European Commission, 2016b, p. 6). Currently, the share of water reuse is relatively low in Europe due to legislative, environmental and economic circumstances (European Commission, 2016b).

The EU's flagship on water policy, the WFD, is often brought forward to address the mismanagement of water resources. However, it does not explicitly refer to water reuse and addresses the drought issue only insofar as it is related to the quality of water and pollution problems. The WFD's daughter directives also do not address water reuse explicitly. The Floods Directive focuses solely on high water quantity issues, and the Urban Wastewater Directive simply states in Article 12 that 'treated wastewater shall be reused whenever appropriate' (interviews, 1, 3, 15, 16 and 22) (Angelakis & Durham, 2008; Directives 91-271/EEC, 2000/60/EC, 2007/60/EC; Paranychianakis et al., 2014). Nonetheless, following the severe 2003 droughts in Europe, the Southern member states in particular experienced implementation difficulties when executing water reuse practices. Since then, discussions regarding water reuse applications have been on the EU agenda (interview 20) (Angelakis & Durham, 2008). These discussions turned into a heated debate, as there was a strong divide of interest and perspective between two groups of member states. More specifically, a dichotomy between Northern and Southern member states can be distinguished (interviews 3, 4, 8, 15 and 23) (Squantani et al., 2017), which can be explained by cultural, physical and geographical differences.

Diverging perspectives

Perspectives on the environmental, health and economic aspects of water reuse vary between the Northern and Southern member states, just as differences can be distinguished in conditions and problems experienced by these coalitions of member states. An example is that North European countries primarily recycle water in the industrial sector, while South European countries mainly reuse water for agricultural purposes (Marecos do Monte, 2006). In this section, the diverging perspectives of both coalitions in the reloading process of water reuse are discussed.

Southern member states (e.g., Spain, Malta, Portugal, Italy, Cyprus, and Greece) act as *change agents* in this debate because they opted for the development of EU-wide regulation and guidance under the WFD, for instance, to standardize best practices on water reuse. Experiences of these member states with current EU water policies revealed a regulatory void concerning the issue of water reuse: agents in these Southern countries lack EU standards for dealing with the health and environmental risks of water reuse. They try to convince the European Commission and other member states to standardize water reuse practices at the EU level. Throughout the WFD's implementation, new information on climate change, water scarcity and water reuse was gained by EU and national research institutes. An agglomeration of Southern member states' domestic experiences with the WFD's regulatory void in this issue, combined with examples of their national pilot projects concerning water reuse and advanced (research) insights were highlighted by this coalition of Southern member states. With the help of this 'reloaded' knowledge and these experiences, they attempt to develop more specific EU guidance on water reuse (interviews 1, 2 and 22) (European Commission, 2016b). For this group, arguing for more EU steering on water reuse is particularly important to solve domestic drought issues and to enable the export of their agricultural products.

In contrast, a group of Northern member states (e.g., the Netherlands, Germany, Belgium, Austria and the UK) is in favour of *maintaining the WFD's status quo*, as their interest in water reuse practices is low and they opt for other solutions to deal with water scarcity, that is, water efficiency measures. Their vested interests in combination with the expected extra workload, administrative burdens as well as fear of EU enforcement of new (detailed) EU-wide legislation or guidance on water reuse all influenced their perspective. This coalition uses their own experiences with the WFD's implementation and ongoing national and regional pilot projects to state that the regulatory void pointed up by Southern member states, does not hinder water reuse domestically thus underlining the superfluity of extra EU regulation. This coalition's incentive for reloading, therefore, is to ensure that no additional standards or legislation are developed for water reuse at the EU level (interviews 6, 9, 12, 17, 20 and 21) (European Commission, 2016b; Paranychianakis et al., 2014). Moreover, while water reuse is an accepted practice in several Southern EU countries with severe water scarcity issues, it is seen as more controversial in Northern member states (European Commission, 2016b).

The pathway of reloading across multiple levels

To better understand this North–South dichotomy and the reloading process for the issue of water reuse, it is important to zoom in on the member state level where water reuse practices are implemented and the reloading processes start.

Regarding the change coalition of Southern member states, Italy was taken as an example. At the local and regional levels in Italy, implementing agents involved with water management acquire practical experiences with the WFD's implementation and are involved with several national pilot projects for water reuse. For instance, in the region of Milan, 90 farms annually irrigate about 4100 ha of farmland with approximately 150 million m^3 of treated urban wastewater. However, water managers did not know how to deal with this project, as EU standards for such projects were lacking. Furthermore, at first citizens and businesses did not trust the quality of agricultural products irrigated with reused water. Nonetheless, confidence increased and the project proved to be successful as the recycled water was relatively cheap, of high quality and checked daily by qualified staff (European Commission, 2016b; Mazzini, 2016; Pizza, 2014). Another example can be found in Ferrandina, Southern Italy, where municipal wastewater has been treated since 1999 in a pilot project led by two research institutes (The Italian Research Institute on Water (IRSA) of the National Research Council and the University of Basilicata). Irrigation in an adjacent olive orchard was achieved successfully with treated wastewater, and the innovative water treatment process protected certain compounds, for example, nitrogen, which could be reused as fertilizer. The project is often referred to because of the uniqueness of such long-term water reuse in Europe and because independent researchers annually monitored a range of hygiene parameters. The results show, for instance, improvement of soil fertility, the reduction of soil erosion, improvement of plant productivity, and the decreasing social and environmental impact of irrigation in a water-scarce region (Del Lungo, 2013; Dichio et al., 2014; EIP Water, 2017; European Commission, 2016b; Palese et al., 2009). These 'on the ground' experiences are exchanged with other regional actors and with national water managers who represent the Italian interest at the EU level, that is, the Italian Ministry for the Environment, Land,

and Sea. In the EU context, this local expertise is shared by national agents in the WFD networks to argue for the establishment of specific guidance for water reuse. For example, the Italian representative recently presented the example of Milan to the European Parliament (interviews 3, 6, 12 and 15) (Mazzini, 2016). Both the examples of Ferrandina and Milan are now explicitly mentioned in EU guidance reports as best practice examples for water reuse (European Commission, 2016b).

As has already been said, the Northern member states argue that more specific water reuse guidance under the WFD is superfluous and they point to the EU's subsidiarity principle. For this coalition, Belgium was used as an illustration. Belgium's national representatives tried to prevent the development of more specific EU water reuse policies by reloading domestic implementation experiences showing that reuse can be appropriately applied without extra regulation. These representatives, often policy officials of the Flemish Environment Agency and the Walloon departments of Agriculture, Natural Resources and Environment, and for Mobility and Waterways, also draw upon experiences of their local and regional counterparts. For instance, they have shown that while there is no specific legislation in Belgium for water reuse, the Torreele water plant in Koksijde, operated by the Veurne region's Intermunicipal Water Company, has successfully reused municipally treated water to produce infiltration water for groundwater recharge in an ecologically sensitive dune area. The dune aquifer of St-André is used for groundwater extraction to produce potable water for nearby communities. Artificial recharge of reused water is used to prevent saline intrusion, enhance natural values and obtain sustainable groundwater management. Within the project of DEMOWARE, new technologies for water reuse were tested in Torreele. The Torreele facility is recognized as a prime example of indirect potable water reuse in Europe and it is included as best practice in EU reports with no further regulation asked for (interviews 17 and 20) (DEMOWARE, 2017; European Commission, 2016b; Van Houtte & Verbauwhede, 2007). Hence, these experiences were reloaded by Belgian actors into the WFD's policy process to illustrate that there was no need for additional EU regulation.

These illustrations show that reloading starts as a bottom-up process: experiences of local and regional implementing agents are exchanged in domestic networks with, amongst others, actors at the national level. Implementing agents can be in direct contact with these national actors, but they can also be represented by subnational organizations. In the Netherlands, for instance, the Union of Water Boards also discusses regional implementation concerns with the Dutch Ministry of Infrastructure and Water on behalf of the 24 regional water authorities (interviews 5, 16 and 18). Subsequently, national representatives use regional and local expertise about implementation as a strategic input to influence the EU policy process in favour of their interests. The next section focuses on the subsequent process of reloading at the EU level and the role of coalitions.

Reloading and coalition-building at the EU level

The competition between the previously mentioned North and South coalitions and their reloading activities took place in the context of WFD's Common Implementation Strategy (CIS). Representatives from both coalitions discussed the issue at multiple levels of the CIS network structure: at the level of technical experts and working groups, such as the working group on the Programme of Measures, and at the more strategic level of water

directors where high-level policy officials join the discussion. From 2016 to 2018, an ad hoc CIS task group was working specifically on water reuse, which is currently seen as the best *venue* for reloading expertise (interviews 1, 3, 6, 10, 12, 15 and 22) (CIS Ad Hoc Task Group on Water Reuse, 2016). The existing CIS network, and its channels and venues, enabled both coalitions in the reloading of implementation expertise regarding the issue of water reuse (interviews 4, 6, 12, 13 and 24). An example is that experiences concerning regional initiatives in the Mediterranean, that is, over 150 pilot projects in Spain, are used by the Southern states as input at multiple venues in the CIS process. One of these is the Depurbaix project in Barcelona. This is the largest water reuse project in the world with a visionary water resource management solution because it combines direct aquifer recharge for the control of seawater ingress with river, wetlands and irrigation to recharge the river basin aquifers (Angelakis & Durham, 2008).

The coalition of Southern member states demanded extra and more precise EU water guidance on water reuse. As the impact of droughts is a particularly sensitive issue in the Southern part of Europe, it was these members who acted as entrepreneurs to raise EU-wide attention to the issue by reloading (sub-)national implementation experiences and by repeatedly asking questions in the CIS process (interviews 1, 3, 15 and 22) (European Commission, 2016b). As all Southern member states, except for Malta, already have national, legally binding, water reuse criteria in place (in Cyprus, Greece, Italy, Portugal and Spain), it is particularly these countries that reload their daily experiences with the WFD and national water reuse practices (Angelakis & Durham, 2008; European Commission, 2016b).

Even though climate projections state that droughts are becoming increasingly significant in Northern European basins as well, governmental representatives of Northern member states, in particular Austria, Belgium, Germany, the Netherlands and the UK, collaborated in an attempt to maintain the status quo (interviews 8, 11, 12, 17, 20 and 21) (European Commission, 2016b; Paranychianakis et al., 2015). Water reuse has been on the agenda since 2003 and several EU-wide actions have taken place since then, for example, the EU Council's call for action on water scarcity and drought in 2006 and the EU communication on water scarcity of the Commission to the Parliament in 2007 (European Commission, 2007). Nevertheless, the Northern coalition's influence and reloading activities were dominant, and their belief system – a comprehensive and integrated WFD – resulted in a relatively stable policy process from 2005 to 2012 (interviews 16, 18 and 22) (Angelakis & Durham, 2008; European Commission, 2007).

Both coalitions are strategic alliances, as collaborating actors share in particular the same interest for reloading. The coalitions are formed strategically and are somewhat ad hoc for this specific issue, yet reflect a relatively traditional classification of actors. The Northern countries, for instance, are familiar with joining forces in the EU setting because for water issues a strategic alliance is often formed, consisting of the UK, France, Belgium, the Netherlands and Spain (interviews 11, 12, 20 and 23). It is interesting that Spain now joins the competing coalition due to diverging interests on the national level. Incentives for collaboration are found on both sides to amalgamate resources and capacities, to speak with a stronger voice, and to coordinate activities. Both coalitions consist primarily of governmental actors or experts invited by these governmental actors, and both constantly reload the WFD's implementation experiences and national water reuse experiences, which is seen as an important technical input to the EU discussions.

While the Southern member states felt that their demands were not heard by the traditional powerful Northern member states, the Commission was very receptive to their concerns and implementation expertise (interviews 1, 3, 5, 7, 14, 15 and 19). This can, on the one hand, be explained by the fact that these experiences were in line with prominent studies on water scarcity and climate change, and with signals from the water business sector (interviews 13 and 22). On the other hand, they were also in line with recent EU policy developments, such as the strategy for a circular economy, and the Commission's aspiration to broaden its policy scope (interviews 3 and 15) (European Commission, 2017b). As the conflict between the two competing coalitions was delaying progress, the Commission mediated between the coalitions of member states to reach a consensus and keep the conflict to acceptable limits. Best practice implementation experiences from Mediterranean water reuse projects were used by the Commission's staff to convince the reluctant Northern coalition to change its belief systems about the need for EU guidance on water reuse (interviews 1, 3, 4, 15 and 23). Examples are the Greek experiences regarding major water reuse sites at Salonica, Heraklion, Hersonissos and Chalkida (European Commission, 2016b; Ilias et al., 2014; Tsagarakis et al., 2001), the fact that Spain already considered water reuse in the WFD's river basin management plans for all its river basin districts (interview 15) (European Commission, 2021a), and the Italian experiences with standards for treated urban and industrial wastewater (European Commission, 2016b).

Outcomes of reloading: stability or change?

Even though no new EU water regulation was formed and no adaptations to the WFD framework itself have been made, several incremental changes in the WFD's policy process can be identified. The first evidence of (incremental) change is the development of the EU Communication 'Blueprint to safeguard Europe's water resources' of 2012 that highlighted water reuse as a concrete and valid alternative to address water scarcity (interviews 3 and 16) (European Commission, 2012). Second, several impact assessment studies on water reuse policy have been conducted (2015, 2016 and 2017), which were informed by studies from the EU's JRC, stakeholder and public consultations, along with regular consultations with member states, their implementing agents and NGOs in the CIS network (interviews 25 and 44) (European Commission, 2017a; Kirhensteine et al., 2016; Mudgal et al., 2015). Third, actions to promote water reuse are included in the European Commission's circular economy package (COM (2015) 614). Fourth, the CIS guideline was adopted (in June 2016) and provides information on integrating water reuse into water planning and management in the context of the WFD (European Commission, 2016b). And finally, the most recent and most significant outcome of this change process is the start of the development of a more specific EU CIS *guideline on water reuse* that will follow the ongoing impact assessment of 2017, although its substantive format has not yet been decided (interview 55). The expected CIS guideline should enable the implementation of future water reuse projects, similar to Depurbaiz in Barcelona or Torreele in Flanders (Angelakis & Durham, 2008).

In sum, several factors triggered this process of policy change, such as: (1) the continuous reloading efforts of the Southern member states coalition at multiple venues in the WFD's CIS network; (2) the responsiveness of the European Commission to the issue

of water reuse and the demands of the Southern coalition (Petitguyot, 2016); (3) the advanced (research) insights that became apparent throughout the WFD's implementation, such as the EU JRC's report on water reuse in Europe (Sanz & Gawlik, 2014) and the Intergovernmental Panel on Climate Change's (IPCC) conclusions on water scarcity (IPCC, 2013, 2014); and (4) the occurrence of several droughts in the Community and the related increasing public and societal attention.

The moment that it became clear that substantial incremental changes would occur (i.e., a start was made with developing guidance on water reuse), the Northern coalition changed its strategy and started to reload its relatively sparse national experiences with water reuse projects to ensure that the new guideline would fit its domestic context. The Dutch, for instance, brought in relevant experiences from their greenhouse horticulture practices, where individual actors treat their wastewater and reuse this during the summer period (interviews 16 and 18) (Cuijpers, 2016).

> The European feedback process concerning water reuse has continued after this study and resulted, amongst others, in new EU regulation concerning minimum requirements for water reuse for agricultural irrigation, which will apply from 2023 and are expected to stimulate and facilitate water reuse in the EU (European Commission, 2021b).

Conclusions

This paper is set out to answer the following question: What role do competing actor coalitions play in reloading implementation experiences in EU water governance? An exploration of the single case of water reuse in the WFD's policy process offered the following three key insights in this regard. First, this study provides insights into the (incremental) pathways of multilevel reloading. Reloading starts as a bottom-up process, as implementing agents directly acquire policy-relevant information throughout their daily implementation practice. Implementation experiences are exchanged, amalgamated and selected by several actors at multiple levels of governance, that is, the regional authorities, representative organizations and national administrations, and exchanged between countries. National representatives at the EU level make use of such bottom-up derived experiences to contribute to the EU agenda and ongoing policy implementation discussions. Hence, a strong domestic network is necessary to feedback to the EU level.

Second, this study illustrates the necessity for individual actors to collaborate in coalitions due to the complicated EU setting. Actors form strategic alliances in processes of reloading to combine resources and capacities speak with a stronger voice and coordinate reloading activities and strategies. The case of water reuse clearly shows conflicts between coalitions. Different sorts of implementation experiences concerning the reuse of water are put forward and highlighted by competing coalitions: the ones that demand policy change and the ones that prefer to keep things as they are. Eventually, the receptiveness of the European Commission, the openness of the EU policy process, and the political and societal attention to the issue of water reuse are all factors influencing which parts of the reloaded implementation knowledge are heard and eventually reach the EU agenda.

Third, the venues used by these coalitions for reloading also appeared to be significant. In the case of water reuse, the strongly institutionalized CIS network (e.g., the familiar members) enabled reloading by both competing coalitions. For knowledge to be taken on board, there was a need to constantly reload implementation information at multiple venues in the CIS. The strongly institutionalized CIS network, a structure established particularly for the exchange of WFD implementation experiences, is unique to the field of EU water governance. It can therefore be argued that the feedback process under investigation is a form of 'guided reloading' in a relatively safe environment for sharing policy implementation knowledge. Thus, reloading is expected to be different for other fields of governance. In addition, the field of water governance is characterized by the involvement of particularly (semi-)governmental and expert agents. The involvement of other types of actors in more complicated coalitions, such as interest groups in the domain of agriculture, can lead to more politicized discussions that leave less room for implementation experiences to be heard. Thus, for further research, it would be interesting to study and compare reloading and the role of competing coalitions in other policy domains as well.

By analysing an example of reloading and strategic coalition-building, this article has attempted to provide insights into, so far, relatively invisible implementation feedback processes. Such insights are of the utmost importance for a better understanding of the EU policy process. Furthermore, it helps to understand the strategic reloading attempts of powerful member state coalitions aiming to change or stabilize the policy process.

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