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When the birds sing. A framework for analysing domestic factors behind policy convergence

Andrea Lenschow, Duncan Liefferink
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ABSTRACT This paper proposes a framework for analysing domestic factors behind policy diffusion and convergence. Three basic factors are distinguished, determining the extent to which countries are likely to take up different types of new policies. These factors are: culture, institutions and economy. They are operationalized with the help of three indicators: dominant religious tradition (culture), the prevailing orientation towards public/private relations (institutions), and the level of economic development (economy). It is argued that these factors may be important to different degrees, dependent on whether policy change involves the basic goals and ideas of a policy, the instruments applied, or the setting or 'calibration' of these instruments. This leads to the hypothesis that countries that are culturally, institutionally or economically close may be expected to adopt similar ideas, instruments or settings in public policy, respectively, and thus are likely to converge on these points. While the argument proposed in this paper applies to policy change generally, we focus on environmental policy for illustration.

KEY WORDS Domestic factors; environmental policy; policy convergence; policy diffusion; 'second image' in international relations.

1. INTRODUCTION

Birds sometimes sing and sometimes they don't. In a similar vein, national policies sometimes converge and sometimes they don't. Speaking very generally and somewhat cynically, this is the key insight to be derived from several decades of studies on the convergence of national policies.

Both convergence and non-convergence have their own logic. On the one hand, all countries in the world largely face the same types of problems, ranging from the organization of the fire brigade to environmental deterioration. These countries, moreover, maintain increasingly intensive relations, for instance through trade, tourism, media, or international co-operation. This would make it plausible that policy-makers learn from each other and, on the longer term, reach some kind of implicit or even explicit agreement on which policies are

considered 'optimal' and ought to be followed. On the other hand, no country is similar to another. Levels of economic development diverge enormously. Each state has its distinct way of organizing government. And cultural traditions show an endless variation, even within countries. These deeply embedded differences would make it only logical that policies will always retain strongly national traits. As with the birds, what happens in practice depends on the circumstances.

Over the years, various views have been put forward as to which forces might induce or impede change in domestic policies and under which circumstances such change might take similar directions across countries. As will be discussed in more detail below, some have concentrated on *how* policy innovations spread around the globe. Others have focused on *what* spreads and (possibly) converges, arguing, for instance, that certain types of policy innovations converge more easily than others. Yet others have stressed the importance of the '*destination*' of the spreading process, that is, the domestic setting in which innovations 'land'. Several papers in this special issue address the first aspect, i.e. the international forces behind spread and convergence. The present contribution develops the second and third aspect combined, i.e. the domestic factors that determine to what extent countries are likely to take up different types of new policies.

To this end, the next section assesses the treatment of domestic factors in the policy convergence literature and related discussions on policy diffusion and cross-national policy learning. We find there is a need to reflect more systematically and develop clear hypotheses on the impact of domestic factors on the nature and scope of cross-national policy convergence. Section 3 therefore distinguishes three central structural factors – culture, institutions and economic development. It is argued that these factors are important to different degrees, dependent on whether change involves the basic goals and ideas of a policy, the instruments applied, or the setting or 'calibration' of these instruments. Here, we focus on the environmental field, but the approach as such should be equally valid for other policy areas. Section 4 goes on to propose indicators by which the cultural, institutional and economic affinity of countries can be assessed. This leads to the basic hypothesis that countries that are culturally, institutionally or economically close may be expected to adopt similar ideas, instruments or settings in environmental policy, respectively, and thus are likely to converge on these points. This hypothesis is planned to be tested empirically at a later stage. Thus, section 5 concludes by summing up the main features of the proposed framework for analysis.

2. INTERNATIONAL POLICY CONVERGENCE: THE ROLE OF DOMESTIC STRUCTURAL FACTORS

The discussion of international policy convergence has spun off 'second image reversed' analyses (Gourevitch 1978) which trace domestic policy change to international examples and dynamics. Other contributions to this collection aim at identifying and analysing the various international mechanisms that

may result in convergence while at the same time bringing some order in the terminological variety that has emerged (see Holzinger and Knill 2005; Busch and Jörgens 2005). The present contribution, in turn, returns to the original second image, that is, domestic factors shaping the process of policy change and influencing patterns of convergence. This focus is rooted in the assumption that there is always an international and a domestic side to the international spread of policy innovation and convergence. In particular, convergence patterns – defined as increasing similarity between countries – are likely to be affected not only by the voluntary or involuntary interactions of state actors on the international scene but also by the domestic predisposition to react to one impulse but not to another.

Screening the literature on policy convergence and the various processes that are frequently associated with this effect – especially policy diffusion, regulatory competition and policy learning¹ – we find little systematic discussion of domestic factors, however. Of those concepts, *policy diffusion* has the longest history, occupying several disciplines. This literature emerged from a general interest in policy innovation which was traced either to political, social or economic characteristics internal to the state or alternatively to intergovernmental diffusion processes (cf. Berry and Berry 1999: 170). In 1975 Collier and Messick argued for bringing the domestic ‘prerequisite’ factors and intergovernmental diffusion explanation together in one analytical framework. But instead the literature began to focus on elaborating the nature of the linkage structures facilitating diffusion between states. Only lately is this literature being complemented by an interest in domestic structural conditions affecting the rate and form of diffusion. Some authors emphasize cultural similarity (Strang and Meyer 1993; Strang and Soule 1998), others point to administrative traditions and capacities (Kern *et al.* 1999) as significant domestic framework conditions. While primarily sociologists argue that foreign models – both policies and organizational arrangements – need to be (made) socially meaningful, political scientists focus more on institutions and resources that make domestic adoption feasible. So far, there has been no attempt to think more systematically about the range of domestic structures – cultural, institutional and economic – that might affect the process of ‘import’ and about their relative importance with respect to the nature of the diffusing ‘object’ in question.²

The literature on *policy convergence* shares the conclusions of those sociological diffusion studies emphasizing the importance of resonance between the exported ‘object’ and the cultural and institutional setting of the potential importer. Van Waarden (1995), for instance, points out that policy diffusion does not automatically lead to convergence as foreign models are likely to be changed to fit national institutional structures and policy styles. In contrast to Strang and Meyer (1993), however, who speak of the need to ‘theorize’ foreign ideas in order to make them meaningful domestically, the convergence literature perceives national institutions and institutionalized practices generally as more ‘sticky’ and resistant against eradication or fundamental change. Typically this literature focuses on one structural dimension, such as

the structure of the welfare state (Scharpf and Schmidt 2002) or national regulatory styles (Van Waarden 1995; Vogel 1986), and investigates to what extent patterns of convergence correspond to similarities between countries along these specific structural characteristics or whether convergence patterns cross these country groupings. Despite such explicit emphasis on the impact of domestic structures, little attempt is made to differentiate between structural categories and link those to policy characteristics that may or may not converge.

The role of socio-economic factors has been strangely neglected in the discussions cited above. However, both the cost of public policy in an international competitive context and the cost of changing these existing rules and regulations and potentially disrupting domestic social and institutional relations are relevant factors shaping the modification of public policy. Domestic policy-makers will aim at identifying 'affordable' responses to increasingly globalized economic relations and dependencies; their 'calculations' are necessarily made in light of domestic socio-economic structures. Theories of *regulatory competition*, for instance, assume differential effects on highly or poorly endowed as well as on more or less industrialized economies. While the validity of far-reaching claims within this literature about convergence on the lowest regulatory level (race to the bottom) is highly disputable (cf. Drezner 2001), the impact of the domestic economic context as such on policy choices remains generally plausible.

Besides cost calculations on the basis of economic constraints and competitive pressures, *policy learning* is a possible mechanism that might lead to domestic change. Applied to intergovernmental diffusion processes, this concept focuses on dynamics taking place in the 'importer' country. Although it is not our aim to analyse the relevance of this or other change mechanisms, the literature on policy learning also points to significant domestic framework factors for convergence. Similar to the literature on policy convergence, analysts of policy learning perceive the process of change as a culturally and institutionally pre-structured process. Actors' choices with respect to following, adapting or ignoring foreign examples are influenced by dominant ideas (policy paradigms or even more general views of the world) and institutional structures at home. Peter Hall (1989, 1993) is a pioneer of this perspective, basing his analysis on an historical institutionalist approach.

In contrast to the policy convergence literature that, when looking at domestic factors, tends to assume institutional path-dependencies, Hall adopts a more differentiated perspective, looking more closely at the policy object in question. Moving between the orders of policy change – rising from policy settings, instruments to general ideas and principles – policy-makers (typically bureaucrats) become more and more embedded in institutional and cultural structures, and hence more constrained with respect to fundamental change. As Hall is mostly concerned with analysing the balance between structure and agency in explaining different 'orders' of learning, he does not investigate the precise nature of domestic structures that impact on actors, however.³ This is the aim of the present article. It starts from the seminal work of Hall in

distinguishing between his three 'orders of policy change', but then attempts to relate these to three structural factors that, in various compositions and intensities, permit or constrain the domestic adoption of 'importable' policies. We depart from past debates that focus on international versus domestic factors or the role of structure versus agency and examine a neglected issue in both debates, namely the diverse facets of domestic structure and their potentially distinct impacts.

3. DOMESTIC FACTORS AND TYPES OF POLICY INNOVATION: A FRAMEWORK FOR ANALYSIS

3.1 Three categories of domestic factors

Given an international impulse towards policy innovation, which factors determine if a country will actually follow this stimulus? As indicated, this is not a contribution to further elaborate on the international factors and the nature of the mechanism leading toward policy convergence; our focus rather is the soil in which the seed of change is sown, i.e. those factors that make up the basic domestic opportunity structure for change. Although most of the theories just reviewed do in fact address, in one way or another, the domestic factors determining the 'likelihood of change', it is our aim to add a more systematic perspective. For this purpose, we will start working from three fundamental sets of 'framework conditions' for domestic policy change: the cultural setting, the institutional setting and the socio-economic setting.⁴

One category of factors determining the domestic opportunity structure for change is culture. Policy-specific political discourses – the ideas and narratives behind policies and policy change – are set within the broader culture of a country. Thus, culture offers an important key to understanding how policy-specific discourses are developed, interpreted and eventually integrated into the domestic policy-making context. As Hall (1993: 289) points out, 'politicians, officials, the spokesmen for society interests, and political experts all operate within the terms of political discourse that are current in the nation at a given time' and that lend 'legitimacy to some social interests more than others'. An example is provided by Hajer (1995), who describes how the UK and the Netherlands translated the discourse of ecological modernization into their national policies in quite different ways, dependent first and foremost on their national culture and relation to nature. While the concept of ecological modernization has indeed spread widely in the world, the concrete meaning given to this concept varies between countries and follows cultural predisposition.

Second, institutionalist theories emphasize the importance of institutional structures as both opportunities for and impediments to change. Steinmo and Thelen (1992), for instance, stress that institutions provide the context in which policy changes are defined. In this tradition, Knill and Lenschow (2000), for example, argue that effective implementation of European Union (EU) policies by the member states basically depends on the degree of

institutional 'fit' between existing institutional arrangements and the institutional implications of the 'incoming' policy.

There are limits to institutional explanations, of course. Institutions may indeed accommodate, 'constrain or refract policies but they can never be the sole "cause" of policy change (Steinmo and Thelen 1992: 3). Institutional analysis argues that institutions are the main independent variable to explain political outcomes in periods of stability. Under highly dynamic circumstances, such as political or economic crises, however, institutions may break down. In that case, they become the dependent variable themselves (Knill 2001). The sociological branch of institutionalism adopts a very wide notion of institutions – including norms and mutual understandings – and thus develops a cultural understanding of their influence on behaviour. Since we want to analytically distinguish between institutional and cultural factors, we follow a thinner definition of institutions, limiting it to organizational structures, formal and informal rules, and policy-making procedures.

Institutions and culture are inextricably linked to a third set of factors, i.e. socio-economic structure and development. As Inglehart (1977) has argued, highly developed industrialized nations tend to pay more attention to 'post-materialist' (e.g. environmental) values. Jänicke (1988) investigated the de-linking of economic performance and environmental pollution and found that structural economic change in the broad sense of the word, such as the growth of the service sector in highly developed economies, can have an environment-friendly result. These examples stress the importance of socio-economic structure as a third determinant for the likelihood of domestic policy change.

To sum up, this paper distinguishes three basic sets of 'framework conditions' for domestic policy change: institutional, cultural and socio-economic factors. These are, as was already hinted at, interlinked and the extent to which a policy innovation is accommodated and adopted by a given country can never be explained with reference to one single factor. Nevertheless, it will be argued below that one factor may be more important than others, depending on the specific type of policy change at stake.

3.2 Three dimensions of change

The innovation of policy may come in different forms. It may involve the development of a new set of ideas, such as ecological modernization in the example above, or the introduction of a new policy principle. But it may also be a new type of policy instrument, for instance emissions trading, or a tendency towards stricter standards for a certain pollutant, owing for instance to new scientific insight. Following Hall (1993), moreover, it seems likely that these different types of policy change will have different implications domestically. Consequently, institutional, cultural and economic factors may be differently relevant as 'framework conditions' for their uptake at the domestic level.

For the purpose of this paper, we adopt Hall's three basic dimensions of policy content. First, we consider the overarching goals that guide policy in a

particular field. These goals operate within a policy paradigm or a 'framework of ideas', specifying the very nature of the problems to be addressed by the policy. Examples are the precautionary principle or the idea of human 'stewardship' over nature. Second, there are the instruments or techniques by which policy goals are attained, e.g. direct regulation, fiscal instruments or voluntary agreements. Countries with different traditions may adopt different instruments to regulate the same policy issue. Third, it is important to look at the precise setting, or 'calibration', of these instruments, e.g. the level of emission standards or taxes, the chemicals included in 'grey' and 'black' lists, etc.

3.3 Combining domestic factors and dimensions of change: a systematic approach

Our search for structural predispositions to change, adaptation and diffusion will be rather well known to readers tuned into the institutionalist literature. Institutional factors are cited to (a) affect a country's general likelihood to depart from existing structures and practices (e.g. presence of veto points in the political systems) as well as (b) group countries into 'families' that share important features and, by implication, sensitivities during reform processes on the level of policy sectors (e.g. models of welfare states or degree of liberalization of the national economy).

Taking a closer look at this literature one sometimes gets the feeling that everything is institutional. Institutional factors range from organizational structures, to normative traditions or belief systems, even to traditional characteristics of the national economy. Using longevity and embeddedness as the main criteria for institutionalization, such wide understanding of the term institution is certainly defensible. To the extent that one aims to develop a differentiated understanding of domestic structural predispositions to change, the distinction into institutions (focusing on organizational, legal and procedural structures), culture (or normative traditions) and the socio-economic framework carries clear advantages, however. Each factor can be further operationalized with respect to the specific question (or policy) in mind and testable hypotheses can be derived.

We begin by suggesting a matrix (Figure 1) indicating the primary domestic factor influencing convergence on the three policy dimensions in general terms, before turning to the operationalization and development of hypotheses with respect to convergence in section 4. In illustrating our arguments we use environmental policy references, but we like to emphasize that this framework presumes more general applicability.

Ideas and principles

Ideas and principles on the policy level establish basic notions on the nature of the problem and legitimate means for handling it. In the environment policy field, for instance, the perception of pollution as a problem depends on an 'idea' of nature as something fragile and worthy of protection (be it for

	Culture	Institutions	Socio-economic structure
Ideas/Principles			
Instruments			
Settings			

Figure 1 Hypothesized primary structural factors (dark shades) for the three orders of policy change

instrumental or 'genuine' reasons). The principles translating this idea into guidance for human behaviour, in turn, may establish concrete notions of responsibility (towards local or global society, future generations as well as nature). In Thompson's words (1983: 233): 'When we look at our environment we do not see it with the naked eye. We see it as it is filtered through a cultural screen – our idea of nature.' In this formulation, culture appears policy-specific; but we argue that there is a strong link between general cultural characteristics of a given society and ideas related to a particular policy. In Hofstede's (1992) classification of national cultures the more or less anthropogenic interpretation of environmental protection and notion of responsibility are tapped by the general cultural dimensions of 'masculinity versus femininity' and 'uncertainty avoidance'. The former measures a nation's general inclination to value collective goals as opposed to egoistic objectives; the latter contrasts a pragmatic handling of uncertainty with an emphasis on notions of truth as basis for action. Hofstede shows some links of both dimensions to the dominant religion of a country, i.e. an even more general cultural dimension. Catholicism and orthodox religion is being associated with uncertainty avoidance and a more masculine culture; Protestantism is linked to worldly and pragmatic ways to cope with uncertainty and a more feminine culture. The link between religion and environmental policy has been pursued by Vogel (2002) and Inglehart and Carballo (1997). The significant role of religious factors has also been shown for economic (Simmons and Elkins 2004) and welfare (Castles 1994; Manow 2004) policy, for instance.

Strang and Meyer (1993) relate cultural factors to diffusion processes – and by implication to convergence.⁵ They 'argue that diffusion is importantly shaped and accelerated by culturally analyzed similarities among actors' (p. 487). The impact of culture on diffusion is considered especially large once cultural categories are situated in a general 'formulation of patterned relationships such as chains of cause and effect' (p. 492) which facilitate the meaningful communication between countries, and hence diffusion. Culture transformed into such 'meaningful formulation' moves down a level of abstraction and close to a policy-specific framework of ideas and principles. In other

words, policy ideas and principles are specific, reasoned embodiments of culture. This leads us to hypothesize that the general cultural framework will be the dominant factor structuring domestic adaptation to foreign input at the level of ideas and principles.

Institutional and socio-economic structures are thought of as potentially significant but secondary domestic factors shaping patterns of convergence. Institutional 'fit' (Cowles *et al.* 2000; Knill and Lenschow 1998) is the shorthand for policy-specific institutional structures that require no fundamental reorientation for the implementation of new ideas. Especially as long as new (fashionable) ideas are merely adopted for symbolic rather than problem-oriented reasons, moreover, their institutional implications may be ignored by the political decision-makers.

As the economic implications of ideas are (or appear) often 'harmless' and are hidden behind abstract formulations, we assume that the stage of economic development forms only a moderate constraint (or opportunity) for change. This is true under the assumption that the level of economic development does not form a threshold for adopting environmental ideas in the first place; hence it is plausible especially for analyses focusing on so-called developed countries. From a more long-term perspective, changes in the economic structure and development may contribute to the emergence of new value systems and cultural change which, in turn, is likely to impact on the reception of new ideas. Specific to environmental policy, Ronald Inglehart and associates (1977, 1997) have traced the emergence of so-called post-material values to increasing economic security and modernization (both within and across societies). This research points to the linkage of the three structural categories under investigation.⁶ For our purposes it is relevant, however, that the cultural soil, regardless of its deeper historical foundations, provides the immediate ground for implanting foreign ideas and principles.

Policy instruments

Policy instruments define how, who and within which organizational structures to do things in order to attain the defined goals and objectives. The choice of policy instruments is typically taken rather autonomously by actors within the state apparatus (cf. Hall 1993: 281–4) who may respond to internal dissatisfaction with past experiences and/or copy or imitate new techniques perceived successful in other settings. The literature on bureaucratic and organizational behaviour suggests, however, that these actors tend to orient their choices on the already existing repertoire of institutional procedures, technologies and organizational forms. New institutional patterns that break with established forms and procedures or appear costly, as considerable time, personnel and financial resources may be required to run a new set of policy instruments (see Pierson (1996) on the notion of 'sunk costs'), are considered rather unlikely.

The crucial role of institutional path-dependencies for the adaptation of new policy instruments has been shown in several policy areas in the EU. For examples in the environmental field, see Knill and Lenschow (1998), Jordan

et al. (2003), Jordan and Liefverink (2004); similarly, Duina (1997) points to the relevance of institutional 'fit' in social policy; Buller (2002) shows that the reformed European agricultural policy meets distinct national reactions linked to the respective organizational structure of that sector. Typically, policy instruments follow more general governance patterns in a country such as the type of state–society relations, the level of state intervention or the importance attached to the law.

But policy instruments are also embedded in a more general political culture of governing and it is not easy to establish priority. Hofstede's categorization is again instructive. His power distance index sets apart the 'Latin' countries from the rest of Europe when measuring attitudes toward human equality versus authority. These are likely to be reflected in the country's preference of legally enforceable rules versus more participatory approaches. His individualism versus collectivism index, which distinguishes all Anglo-Saxon countries and the Netherlands on the individualistic side from the rest of the investigated countries, will impact on market versus state dominance in governing the society with an equally close link to the choice of policy instruments. Arguably, institutional categories focusing on the role of the state and the law in governing society can be viewed as institutionalized forms of the political culture dimensions just described. Previewing the operationalization chosen below, pluralism builds on equality-based and individualistic cultural characteristics; neo-corporatism represents a middle category on both cultural dimensions; while statism is linked to more authoritarian and collectivist cultural patterns. The question whether the proposed institutionalist short-cut, by-passing more complex cultural categories, is justifiable needs to be tested empirically. Generally, the empirical test (not included in this paper) needs to control for the risk of multicollinearity that runs through this analysis.

Notwithstanding that the choice of a policy instrument implies economic costs and benefits, an analytical linkage between the socio-economic structure of a country and its pattern in adopting new policy instruments appears remote. Modernization theory, pointing to an interdependent relationship between economic and democratic development, suggests more participatory patterns in economically advanced countries; similarly, the use and diffusion of market instruments may be associated with the level of economic (and hence market) activity. Given the somewhat speculative link between these factors in the literature we consider economic structure as a merely secondary factor.

Settings

The choice of policy settings, by contrast, is primarily influenced by the question 'can we afford this?' Meeting certain standards or norms, the introduction of taxes, fees or subsidies as well as procedural settings such as the duration of review processes, for instance, affect the resource base of a country and of social or economic groups within a country.

Especially in cases where the competitiveness of the country is affected by regulatory settings, the level of economic development and the structure of

the workforce will be major determinants in choosing a setting. The choice-theoretical literature on races to the top or bottom in setting regulatory standards (cf. Holzinger 2003; Scharpf 1996) is based on this notion. While generally the economic rationale will call for a setting of low standards, hence keeping production costs low and internationally competitive, we may witness an international trend towards the top if high regulating states make a credible threat of closing their markets to products of lower standard. The setting of policy instruments is therefore a consequence of comparing the costs of (new) settings with the benefits of market access.

Such economic rationale becomes problematic when the policy settings do not refer to tradable goods but production processes. In order to explain that we may witness a race to the top here as well, reference to economic structure and development may not suffice. While it may be true that a country will orient the setting of policy instruments on budgetary constraints and the relative strength of the economy (or the sector affected), it will also be guided by social and cultural understandings of appropriateness and the answer to the question 'Do we want high standards or tight controls?' Besides economic features such as the level of industrialization, the intensity of agricultural production, the degree of urbanization, etc. which are closely tied to levels of environmental destruction in a country, the culturally determined problem perception and the search for 'appropriate' responses impact on the settings of a policy instrument. In a risk-averse culture the regulatory constraints on economic activity are likely to be set at a more severe level than in a culture of risk-takers. A country with a predominant Protestant culture may not only show particular sensitivity to human-induced threats to the eco-system but will also be willing to adopt such policies earlier and with higher standards than other countries. Similarly, a country with an authoritarian culture will not only be hesitant in the very adoption of communication-based instruments, but also more restrictive in setting such instruments once they may have entered the national repertoire of policy tools. Institutional structures by contrast can be generally assumed to play only a secondary role in the setting of policies, as usually they are not themselves challenged but merely operate as filters.

4. SIMILAR POLICIES IN SIMILAR COUNTRIES? THREE HYPOTHESES

In the preceding section, we proposed an ordering of domestic factors in relation to their anticipated impact on the adoption of different types of policy innovations. On this basis we will now formulate three testable hypotheses and, to this end, we will operationalize our three domestic factors – culture, institutions and socio-economic structure – with the help of indicators, one for each factor.

In selecting these indicators, we chose rather basic indicators frequently used to characterize the policy-making of countries in cultural, institutional and economic terms. We focus on environmental policy in our illustrations and our indicators were chosen to resonate with environmental policy

debates. Nevertheless, none of the indicators is specific to environmental policy as the cited literature confirms. Our indicators allow us to cluster countries that share certain domestic factors. In this section, by way of thought experiment, we will do so for a sample of almost all – Western and Eastern – European countries plus the US, Mexico and Japan. This sample coincides with the focus of an ongoing research project⁷ which investigates the degree and causes of convergence of policies around twenty-seven environmental issues in twenty-three countries over a period of three decades. On the basis of expert surveys, it brings together detailed information on the development of policy ideas, instruments and settings over time. These data will enable us to test our hypotheses empirically at a later stage. It should be emphasized that this rather tentative exercise is not meant to ‘label’ countries as a goal in itself. Its only purpose is to make our hypotheses more concrete and testable. Furthermore, this exercise is not designed to explain single cases, but rather to suggest probable convergence trends in larger N samples. While section 4.1 deals with the cultural ‘opportunity structure’, sections 4.2 and 4.3 discuss the institutional and socio-economic structures, respectively.

4.1 Culture

General hypothesis: Convergence of ideas, principles and goals of environmental policy can be accounted for by cultural rather than institutional or socio-economic similarity between countries.

According to this hypothesis, clusters of countries that are culturally close may be expected to adopt more or less similar ideas, in this case about environmental policy, around the same time. Culture, moreover, is expected to account better for such convergence than institutional and socio-economic factors.

In an illuminating article, Vogel (2002) reviews a number of possible explanations for differences in environmental ethics among twenty-four rich countries. For this purpose, he distinguishes between ‘light green’ environmentalism, focusing on domestic health and safety concerns, and ‘dark green’ environmentalism, with a much broader, less anthropocentric scope. Among factors such as relative wealth, the pathway towards industrialization, and civic culture, religion is found to be the only one fully correlating with the ‘shades of green’ observed in his sample. Vogel elaborates on this by claiming that ‘dark green’ environmentalism is more likely to be found in countries that are (or historically have been) dominated by Protestantism, given their pervasive sense of morals, an emphasis on individual responsibility, a pessimistic or even apocalyptic world view, and a tendency towards self-discipline (Vogel 2002: 317). According to Vogel, this is an important reason why Protestant countries have generally facilitated earlier and more eco-centric environmental policies than others. The usefulness of religion as a shorthand for cultural attributes that may have an impact on the spread of ideas is supported by a recent study by Simmons and Elkins (2004). They convincingly show that having a similar religious tradition corresponds well – and much better than other

cultural factors – with the uptake of certain ideas about the liberalization of the national economy.

Following this logic, one would expect predominantly Protestant countries to base their environmental policies on roughly similar ideas and principles, which can be distinguished from those adopted by Roman Catholic or other countries. Protestant countries, with their tradition of moral responsibility, for instance, may be more inclined to adopt the precautionary principle than Roman Catholic ones (Vogel 2002: 317–18). Basically drawing upon Vogel's paper, we use the categories of countries set out in Table 1 (Vogel 2002; see also <http://www.nationmaster.com>).⁸ Note that for the present purposes, only the distinction between Protestant and 'other' (i.e. Roman Catholic, Orthodox, Buddhist, etc.) countries is relevant.

4.2 Institutions

General hypothesis: Convergence of environmental policy instruments can be accounted for by institutional rather than cultural or socio-economic similarity between countries.

This hypothesis claims that similar types of instruments are most likely to be adopted in countries with a roughly comparable institutional structure. It also presupposes that institutional factors are more important in this respect than cultural or socio-economic ones.

The governance discussion captures this institutional dimension of national policy-making rather well. Governance signifies 'das Gesamt aller nebeneinander bestehenden Formen der kollektiven Regelung gesellschaftlicher Sachverhalte: von der institutionalisierten zivilgesellschaftlichen Selbstregulierung über verschiedene Formen des Zusammenwirkens staatlicher und privater Akteure bis hin zu hoheitlichem Handeln staatlicher Akteure' (Mayntz 2003: 72).⁹ These basic principles of political rule-making correspond to the conventional categories of (liberal) pluralism, neo-corporatism and statism, respectively (e.g. Van Waarden 1995; Schmidt 1999).¹⁰

Apart from legal prohibitions or obligations, which generally are the dominant tools in regulatory policy, alternative instruments may also be applied to influence the behaviour of industry or societal actors. We suggest that the likelihood of using economic or society-based instruments varies across governance systems. National systems generally characterized as statist may be expected to exhibit the strongest preference for 'state-centred' legal instruments and direct regulation ranging from prohibitions and bans to obligatory product and production standards. Liberal-pluralist countries, in contrast, will be relatively more inclined to try 'hands-off' approaches and choose market-based instruments such as taxes, levies or emissions trading. The key to neo-corporatism, finally, is *negotiated* rule-making and the exchange of influence (on the content of policies) against co-operation (in the implementation of these policies) (Schmitter 1974). Neo-corporatist systems would therefore be most

inclined to apply instruments based upon negotiation, consensus and trust, such as voluntary agreements. Table 1 presents our clustering of countries as regards the basic orientation of public/private relations, based upon Williamson (1989) and Van Waarden (1995).

4.3 Socio-economic structure

General hypothesis: Convergence of environmental policy settings can be accounted for by socio-economic rather than cultural or institutional similarity between countries.

The claim here is that, as far as domestic factors are concerned, the precise level at which environmental policies are calibrated (standards, norms, levies, etc.) primarily depends on socio-economic parameters.

Intuitively, economic development and environmental quality in a country are negatively correlated. Increasing production and consumption typically leads to more pollution. Since the 1960s, however, environmental policies have been introduced to bring about a 'de-linkage' of economic growth and environmental deterioration within the group of developed countries (Jänicke 1988). Particularly in the most highly developed countries, moreover, a shift is taking place away from traditional industrial activities to 'high-tech' production and a more service-based economy, allegedly leading to a further 'de-linkage', an increase of post-materialist values (Inglehart 1977), and better opportunities for advanced environmental policies (Huber 1982).¹¹

Richer countries, in sum, have both more reason and more means to control pollution. We thus expect that more developed economies will tend to have stricter standards in environmental policy than less developed ones (Vogel 1997). In Table 1 we have grouped our countries according to the basic indicator of gross domestic product (GDP) per capita (UNDP 2003).

5. CONCLUSIONS AND OUTLOOK

In this paper, we have tried to systematically link a number of very basic properties of countries to the likelihood of them taking up different types of policy innovations from abroad. More particularly, we have argued that new *ideas, principles and goals* impinge first and foremost on national *culture*. Therefore, countries that share important aspects of their cultural foundations might be expected to more quickly adopt similar ideas, principles and goals than countries that are culturally less close to each other. As a proxy for the aspects of cultural affinity between countries relevant for environmental policy, we proposed religion. Likewise, it was claimed that new policy *instruments* primarily have organizational consequences, rendering *institutional* factors crucial for their adoption. Thus, countries with a similar governance orientation were hypothesized to share preferences for the same types of instruments. The precise *setting* of the instruments, finally, was considered to be a matter primarily of *socio-economic* patterns. Countries with comparable levels of economic development were therefore expected to adopt roughly similar levels of environmental protection.

Table 1 Clustering of countries on the basis of cultural, institutional and economic indicators*

Countries ¹²		BG	BE	DK	DE	EL	ES	FR	IE	IT	HU	NL	AT	PL	PT	RO	SK	FI	SE	UK	CH	JP	MX	NO	US
Culture (indicator: religion)	Protestant			+	+							+						+	+	+	+			+	+
	Other	+	+			+	+	+	+	+	+		+	+	+	+	+					+	+		
Institutions (indicator: public/ private relations) ¹³	Neo-corporatist		+	+	+							+	+					+	+		+	+		+	
	Liberal								+											+					+
	Statist	+				+	+	+		+	+	?		+	+	+	+						+		
Economy (indicator: GDP per capita (PPP US \$)) ¹⁴	Above			+					+			+	+								+			+	+
	Moderate		+		+		+	+		+						+		+	+	+		+			
	Below	+				+					+			+		+	+						+		

*Explanation and sources: see text.

This analysis is a simplification of reality in at least two ways. First, the adoption of, for instance, new ideas can of course in practice never be *only* dependent upon cultural factors. As pointed out, all three basic factors must be supposed to play an interrelated role in the uptake of all types of policy innovations. Nevertheless, we do think to have made plausible that for the adoption of each type of policy innovation (idea, instrument or setting), one basic domestic factor (culture, institutions or economy) is generally more important than the other two. Second, policy innovations in practice hardly ever consist of new ideas, new instruments or new standards exclusively. Most often, to be sure, one implies the other. In a new instrument, for instance, some new way of thinking about the problem at stake is almost inevitably implicit. As soon as the instrument is adopted, moreover, it usually requires some sort of calibration, e.g. a concrete emission standard or a tax level. We argue, however, that this should not necessarily prevent us from identifying, for analytical reasons, the essence of any given policy innovation: either idea or instrument or setting.

The principal advantage of this two-fold simplification is that it allows for a systematic study of the impact of domestic factors on convergence. So far, most studies of convergence, and particularly those paying due attention to the domestic setting of 'importer' countries, have been based on in-depth process tracing. Although good case study work can be extremely valuable – we will be the last to deny that! – its results usually remain difficult to generalize. The three hypotheses derived from our ranking of cultural, institutional and socio-economic factors according to their expected impact upon the adoption of different types of policy innovations, in contrast, can be tested empirically across a large number of cases. As mentioned earlier, we intend to do so, on the basis of data being collected at present.

An empirical study of this kind will not tell us *why* the birds sing. It will not help us to understand the process of policy spreading across countries. But it will provide better insight into *where* and *when*, i.e. under which circumstances, they sing. Our basic argument, in fact, is that birds of a feather are more likely to burst into song. By using data over a large number of cases and a large number of countries, it can now be tested if different structural domestic characteristics in the 'importer' countries are indeed significant variables for explaining patterns of convergence.

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NOTES

- 1 There are other mechanisms, including coercion, multilateral co-operation or policy transfer. In this review section we focus on those where the literature has at least touched on domestic structural factors. Implicit in our treatment of the literature is the assumption that we can investigate domestic factors as a discrete explanatory category, independent of the nature of international factors. Hence, we do not reflect on the weight of single domestic factors depending on the nature of the international impulse – e.g. coercive or co-operative. Rather we will focus on the weight of single domestic factors in relation to the policy 'object' that may or may not spread between states.
- 2 It must be noted at this point that we are focusing on relatively stable domestic structures rather than on the full range of domestic factors that might affect policy change – such as technological or scientific innovations, problem pressure, changes in government or public opinion. While some of these factors may be conceived of as specific facets of the structural factors mentioned – technological development as well as problem pressure have links to the socio-economic structure of a country, cultural as well as socio-economic factors may influence a country's scientific potential (though not specific innovations) – in this general paper we will not trace the relations between structural and policy specific domestic factors. Importantly, we also abstract from political factors. While, for example, the views of the electorate and the composition of the government undoubtedly play a role in adopting new policy approaches (potentially converging to international examples), these do not result in stable convergence patterns across time and policy areas, in which we are interested in this paper.
- 3 Implicit in his analysis is a mixed picture of cultural (ideational) and institutional factors, without placing them in any order. Economic *structure* receives no special attention, in contrast to the impact of economic *crisis* which may induce public pressure challenging even deeply embedded policy patterns.
- 4 We are not, in this paper, interested in the behaviour of individual actors, but in the domestic structural opportunities and constraints they face in converging with practices in other countries. This focus allows us to develop hypotheses for a large N country comparison.
- 5 See also Kern (1999) for an analysis specific to environmental policy.
- 6 The causal direction is far from clear, however. Max Weber in his 'Protestant Ethic', for instance, suggests the opposite causal chain in tracing capitalist development to cultural (religious) conditions.
- 7 The project 'Environmental governance in Europe: the impact of international institutions and trade on policy convergence' (2003–2005), for short 'ENVIPOL-CON', is financed by the EU and carried out by the Universities of Konstanz, Nijmegen, Hamburg, Berlin (FU) and Salzburg.

- 8 The classification of Germany as Protestant is problematic although it corresponds to a general practice in the literature. The empirical analysis may watch for 'irregular' German patterns.
- 9 In our translation: 'the total of all existing forms for collectively handling society's affairs: from the institutionalized, private self-regulation to various forms of co-operation between state and private actors and to the exclusive and hierarchical rule of state actors'.
- 10 An even more parsimonious alternative could be the 'varieties of capitalism' approach, which distinguishes between co-ordinated and liberal market economies (Hall and Soskice 2001). As this approach focuses on relations *within* the market sector it has difficulties accommodating more state-dominated systems like France and Italy which, however, form a distinct class in regulatory policy-making.
- 11 Economists refer to the environmental Kuznets curve, which has the shape of an inverted 'U', to reflect the turn from a negative to a positive relationship between income and environmental quality of a country.
- 12 For the EU and candidate countries we have used the country code and country order as applied by the EU (<http://publications.eu.int/code/en/en-370101.htm>). The remaining countries we have put at the end of the table in alphabetic order by their English names.
- 13 The institutional classification of East European states raises certain problems. In an initial step, Bulgaria, Hungary, Poland, Slovakia and Romania have been classified as statist countries in view of their history as statist and the relatively brief period, only since 1989, in which changes have taken place in those countries. Recent work on the nature of labour relations in East European states (cf. Kohl and Platzer 2004), i.e. a policy field with particularly pronounced patterns of state–society relations, confirms that the level of state intervention in these countries remains very high (p. 280). A partial exception is Hungary which is approaching corporatist structures of Germany and Austria. Kohl and Platzer also refer, however, to certain specific features of these transformation countries as well as to the existence of different speeds of institutional change. Hence, it will be necessary to investigate the convergence behaviour of East European states carefully.
- 14 Three groups are distinguished, based upon the average of the GDP (Purchasing Power Parity (PPP) US \$) over all countries plus respectively minus half of the standard deviation.

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