Stakeholder involvement in policy processes - solution or problem? The case of action plans for organic food and farming in Europe

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Stakeholder involvement in policy processes – solution or problem? The case of action plans for organic food and farming in Europe

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Abstract
Stakeholder involvement has gained prominence in EU policy making as a practical measure for obtaining policy legitimacy and efficiency. This paper suggests that in practice stakeholder involvement may cause additional problems to policy making and evaluation. The results are derived from an assessment of impacts of stakeholder involvement in the policy of organic action plans in the EU and member states. The assessment is based on a distinction between closed and open networks of stakeholders derived from a combination of theories of evaluation and policy networks. The assessment illustrates considerable variation of stakeholder involvement in policy making on the EU level – ending up in closed networks of mainly organic stakeholders. In eight EU member states attempts were made to involve a broad range of non-organic stakeholders in developing an evaluation toolbox, but closed networks of mainly organic stakeholders emerged through self selection. The attempts to involve stakeholders was followed by ambiguous results. A low number of national organic action plans indicate low efficiency and stakeholders’ negative perceptions of the EU organic action plan indicate low legitimacy.

Introduction
The term ‘stakeholder involvement’ has gained prominence in EU policy making. In Eurojargon (2009), it is emphasized that ‘The European Commission makes a point of consulting as wide a range of stakeholders as possible before proposing new legislation or new policy initiatives’. More formally, an EU white paper on principles of European governance mentions involvement of all stakeholders in all stages of the policy process as a remedy against the ‘disconnection’ between the union and its citizens with the objective to ‘open up policy-making to make it more inclusive and reliable’ (EC, 2001), and, regarding policy evaluations, Evalsed (EC, 2006), the revised EU evaluation system, explicitly introduced stakeholder involvement at various stages of evaluation. Involving stakeholders aims at making policy more legitimate and effective, and stakeholders get policy influence in exchange for information and legitimacy\textsuperscript{4}. The aim of this paper is to discuss results from involving stakeholders in a distinct EU policy issue on the basis of combined theoretical insights on policy networks and evaluation.

Stakeholder involvement is not part of the established political science taxonomy, but it relates to the notions of policy subsystems (Sabatier, 1993; Baumgartner & Jones, 1993; Howlett & Ramesh, 2003) and governance (Marsh & Rhodes, 1992; Sørensen & Torfing, 2007). These theories emphasize the political importance of networks formed by various types of actors with interest in a specific policy issue. Following Marsh & Rhodes (1992), policy networks may vary between influential policy communities characterized by privileged membership and consensus; and less influential issue networks with dispersed membership and internal conflict. Within this theoretical optic stakeholder involvement is thus about the composition of policy networks, and the EU wish to

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\textsuperscript{4} Skogstad (2003) suggests that EU policies increasingly are legitimized on the basis of inputs from stakeholders at the expense of being legitimized by policy output developed by experts.
involve a wide range of stakeholders appears an attempt to avoid the establishment of influential policy communities.

In evaluation theory, however, stakeholder involvement has a long and well-established position as a practical solution to problems of efficiency and legitimacy similar to those referred to in the EU white paper regarding policy processes (EC, 2001). Stakeholder involvement is to add information on the evaluand to the evaluator to increase evaluation utilization (Cousins, 2003). Cousins & Earl (1995) distinguish between a conventional model in which many stakeholders are consulted and a participative model in which few primary stakeholders are deeply involved in the evaluation – in some cases aiming at empowering non-privileged stakeholders (Greene, 1997).

When put together, the theories on policy networks and evaluation indicate that stakeholder involvement may not only be a practical solution to problems of efficiency and legitimacy. Stakeholder involvement can affect network and power relations in ways that may reduce the problem solving effect and even introduce additional problems regarding legitimacy and efficiency. The extent of the problem solving effect of stakeholder involvement is thus an empirical question.

In this paper we contribute to answering the question on the basis of a study of stakeholder involvement in policy processes and evaluations relating to one specific EU policy issue: action plans on organic food and farming. It is a well-defined policy issue within a salient policy area: the Common Agricultural Policy (CAP) characterized by highly institutionalized policy communities (Nugent, 2003; Daugbjerg, 1998; Grant, 2006) that exclude the many different representatives of producers and consumers with stakes in organic food and farming (Dabbert et al., 2004).

Stakeholders of organic food and farming were, however, involved in all stages of the policy process on organic action plans. In methodological terms this is thus a critical case of stakeholder involvement (Yin, 2009) since problems of broadening out stakeholder involvement are expected to appear rather clearly because of the major differences between the well-established agricultural policy community and the very loose network of the various types of organic stakeholders.

The analysis is based on findings in an EU sponsored research project on organic action plans on the EU level and in member states (www.orgap.org). After theoretical and methodological considerations we present the EU policy on organic food and farming and its stakeholders. The empirical analysis is about stakeholder involvement in various stages of the development, realization and evaluation of an EU action plan. The main conclusion is that stakeholder involvement has taken many forms, but none of them has been successful in combining purely organic and mainly non-organic private sector stakeholders. During the process, closed networks on organic action plans appeared that primarily included organic private sector stakeholders. The effect on legitimacy and efficiency was limited since the organic stakeholders still were very critical to policy and far from all member states have yet introduced national organic action plans.

Theory and methodology

Within evaluation theory, ‘stakeholder’ is defined as a very inclusive notion related to a specific policy program. Vedung (1997: 70) includes all those individuals and groups involved in or with an interest in the emergence, execution and results in a policy decision or a policy program, and lists all potential types of stakeholders. The most obvious ones are the politicians and the public administrations producing and implementing the policy decision, and the clients/beneficiaries/addressees that may be represented by non-governmental organizations. In addition, Vedung

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\(^{5}\) Evalued – the EU sponsored evaluation guide identify the following as key stakeholders: “authorities who decided on and financed the intervention, managers, operators, and spokespersons of the publics concerned.” The emphasis is thus
counts among stakeholders neighboring agencies, program competitors, and others in the immediate environment of a policy decision. The analytical interest of evaluation theory in stakeholders is their interest in and knowledge of the effects of a policy decision and their capacity to influence decisions and their effects. Stakeholders thus combine policy makers and policy takers - i.e. persons and organizations (potentially) affected by a policy.

In political science and in theories on policy networks more specifically, the main interest is on policy makers – i.e. the actors of the political system. Actors include all those actively involved in politics, and policy is developed through actors’ interaction, which constitutes policy subsystems in which actors bargain policy issues in pursuit of their interests. Through their interaction actors establish policy networks in relation to a policy issue or a set of issues and eventually a policy sector of interlinked issues may develop (Howlett & Ramesh, 2003: 53f; Daugbjerg, 1998). The sectoral policy subsystem is constituted by a limited number of actors and the way in which they interact is expected to influence the contents of policy. The delimitation and structure of any given policy subsystem is contingent upon the relative significance of its constituents. Marsh & Rhodes (1992) distinguish between tight policy communities with systematic policy influence on a broad policy area and open issue networks with rather accidental influence on few policy issues (Daugbjerg, 1998a). A policy network is thus characterized by the policy makers among stakeholders included and their interaction; and the composition of their interests and discourses are expected to influence the contents of the policy development within the policy subsystem (Howlett & Ramesh, 2003; Baumgartner & Jones, 1993; Sabatier, 2007).

Theories of evaluation and of policy networks represent different understandings of stakeholders and their involvement in policy processes. Evaluation theory is as inclusive as possible and the composition of stakeholders in relation to a policy decision is subject to study in each case without caring much about political consequences of regularities in or limitations to the actual selection of stakeholders. Theories of policy networks, on the other hand, focus on regularities across policy decisions where policy makers constitute policy subsystems and networks with structural impacts on long term policy development. The empirical focus of evaluation theory is thus on single policy decisions or programs while the appearance of policy networks and policy subsystems presupposes recurrent and long term interaction – i.e. that interaction in relation to any given issue may be conditioned by previous interactions on related issues, and may in turn condition future interactions. Whereas evaluation theory takes a more pragmatic and descriptive stand on defining stakeholders as a means to obtain legitimacy and efficiency, policy network theory gives attention to regularities and potential limitations in stakeholders’ membership of networks and their impact on policy content - and thereby on how policy efficiency and legitimacy are defined.

Policy network theory thus introduces the idea that the composition of actors within any given policy area is shaped systematically by policy networks and subsystems. Obviously, these considerations are also relevant when including policy takers in analyses of evaluations since there is no reason to expect that policy networks should shape the involvement of policy takers in evaluation as policy process in systematically other ways than policy makers.

**Conventional and participative models of stakeholder involvement**

Analyses of the impact of policy networks are rather complex and not easy to apply on the complexity of policy making in the EU and member states in general (Marsh, 1998) and more
specifically with regard to agricultural policy (Daugbjerg, 1998; Moschitz, 2008) – not least when attempting to include policy takers. Even the record of analyses of stakeholder involvement in evaluations is very short. Cousins (2003) compared the utilization of several evaluations on three dimensions of stakeholder involvement and we wish to extrapolate his research design from covering participatory evaluations of single organizations to also cover meso level sectoral policy processes.

Cousins’ (2003) study is based on the distinction between conventional and participative models of stakeholder involvement in evaluation on three dimensions introduced by Cousins & Earl (1995). The dimensions are selection of stakeholders, depth of stakeholder participation and stakeholder control over the evaluation. The conventional model of stakeholder involvement is characterized by a broad selection of stakeholders including a large number of potentially interested; by only limited depth of involvement as stakeholders are only consulted about evaluation questions; and by only little stakeholder control over the evaluation process. The participative model of stakeholder involvement on the other hand is characterized by a selection of only few and small groups of primary users, deeply involved in formulating evaluation questions and with high control over the evaluation through joint responsibility with the evaluator (Cousins, 2003). Cousins’ distinction between conventional and participative models on the micro level is parallel to Vedung’s (1997) distinction on the meso level of policy evaluation between a North American and a Swedish model. The North American model is similar to Weiss’ model (1998) and parallel to Cousins’ conventional model. The Swedish model is parallel to Cousins’ participative model as ‘the stakeholders perform the evaluation and takes responsibility for its results’ (Vedung, 1997: 76) exemplified by policy commissions with a limited number of members.

Cousins’ (2003) theoretical expectation is that the participative model of evaluation implies higher utilization than the conventional model and thus higher efficiency and legitimacy. What he finds is that although utilization (i.e. efficiency and legitimacy) was high in participative evaluations many of the evaluations included in the assessment deviated from the pure participative model on all dimensions in direction of the conventional model. The ideal of a small selection of primary users was challenged by experienced needs to increase representativeness by including a broad selection of additional participants. The ideal of deep involvement in formulating evaluation questions was challenged by experiences that stakeholders in some instances only included reactive interface activities from stakeholders. Finally, the ideal of stakeholder control was often hindered by practical considerations – and if the ideal was realized there was a danger of creating false expectations among highly involved stakeholders regarding the impact of the evaluation. Especially the findings on the selection of stakeholders confirm Greene’s (1997) cautions on the need to balance powerful and powerless stakeholders - introducing conflicts among stakeholders - and the issue of self selection, since far from all stakeholders find it meaningful to participate as much as expected in the participative model.

The discussion within evaluation theory on the lack of utilization of evaluations suggests it relevant to transfer Cousins’ theoretical expectations of higher utilization of participative evaluations to the meso or sector level. In addition, his reserved confirmation of the expectations is in line with the suggestions above based in network theory that stakeholder involvement and its effects may not be as simple as expected. When Vedung (1997) even exemplifies the participative model on the meso level with policy commissions, it seems justified to extrapolate Cousins’ methodology from micro level evaluations to stakeholder involvement in meso level evaluations and in sectoral policy subsystems.
The transfer of Cousins’ distinction between conventional and participative models of stakeholder involvement to policy subsystems can lend upon the distinction between policy communities and issue networks (Marsh & Rhodes, 1992). The conventional model in evaluation parallels issue networks characterized by large numbers and conflict, while the participative model parallels policy communities characterized by small numbers and consensus. It is simple to transfer Cousins’ dimension of selection to the policy process, while the dimensions of depth of stakeholder involvement and stakeholder control must be adapted to the broader context. Depth of stakeholder involvement in the policy process may thus vary between consultation in issue networks and engagement in formulation of policy problems and solutions in policy communities; and control of the policy process rests with the organizers of the policy process in issue networks and with the policy community itself in policy communities.

Although the distinctions used by Cousins and Marsh & Rhodes are parallel the theoretical and normative understandings behind them differ substantially. Cousins associates privileged access to evaluation to only few stakeholders with positive impacts on utilization – i.e. efficiency and legitimacy of (the evaluation of) a given policy program – while network theory, on the other hand, associates privileged access to few actors in policy processes with democratic problems directly entailing problems of legitimacy and indirectly of efficiency because they may disturb an efficient allocation of resources across policy sectors. The difference is justified by the attempts made in participatory evaluations to use privileged access as a means to empower non-privileged stakeholders while in network theory privileged access is only associated with privileged actors. The empirical relevance of these differences in understanding network influence is softened by Cousins’ finding that efficiency and legitimacy are not as closely related to the pure participative model as theoretically expected. When Cousins relaxes the relation between the participative model and efficiency and legitimacy it paves the way for even relaxing the idea of network theory that issue networks may entail fewer democratic problems but more problems regarding the efficiency of policy within the sector.

The theoretical and methodological considerations can be summarized into an empirical distinction between types of stakeholder involvement in policy processes (including evaluations) shaped by Cousins’ notions and dimensions, and informed by network theory. In this model of stakeholder involvement in policy processes, open networks signify a situation with low scores on stakeholder selection (i.e. open access to many stakeholders), depth of involvement and control over policy/evaluation process while closed and tight networks signify a situation with high scores. Very open networks thus represent one extreme, while closed networks represents another extreme of stakeholder involvement in policy processes. This is illustrated in table 1. Still, the contributions of stakeholder involvement to policy legitimacy and efficiency remains an open question to be assessed on the basis of the three dimensions of stakeholder selection, depth of involvement and control over policy processes and evaluations. To illustrate the argument, we analyze the EU policy on organic action plans in context.

Table 1 about here.

The EU policy on organic food and farming – and stakeholders

Stakeholders relate to policy sector – and to polity, i.e. the institutional setting within which the policy process takes place. The EU polity includes the EU institutions and the institutions of the member states and stakeholders of EU policies thus include stakeholders on the EU level and in the
member states – potentially a rather infinite number with increasing number of member states. In formal terms, EU policy processes involve interaction between the EU Commission and the General Directorates (DGs) who initiate policies to be approved by the European Parliament and member state governments through the European Council, and member states are to implement EU policies in cooperation with the DGs (Hix, 2005). In real terms, the EU Commission seeks assistance from member states and other types of stakeholders in policy initiation through comitology and expert committees including Advisory Committees in different policy areas (Hix, 2005; Nugent, 2003). Hence, although much literature on Europeanization (Featherstone & Radaelli, 2003) focus only on member states’ role as policy takers or downloaders of policy when they transpose EU law, the issue of stakeholder involvement in the EU policy process turns attention to the fact that member states (and other stakeholders) even may have access to the initiating stages of the policy process as policy makers or uploaders of policy (Hix, 2005; Radaelli, 2003).

The development of EU policies on organic food and farming reflects the interaction of member states and the EU Commission in all stages of the policy process. In the late 1980s some member states installed policies in support of organic food and farming, and soon after the EU began to consider a common regulation of the many private sector definitions of organic food as part of developing the Single Market, and of allowing subsidies paid to organic farming due to its environmental friendliness as part of the 1992 reform of the Common Agricultural Policy (CAP) (Lampkin et al., 1999; Lynggaard, 2006).

The defining characteristic of organic food and farming is and was at that time its opposition to the use of chemical inputs (fertilizers, pesticides, additives) in mainstream or so-called conventional agriculture. Hence, when the EU Commission had decided to introduce organic food and farming policies it could not rely exclusively on the legitimacy of the existing CAP policy community. The organic sector was, on its side, so small and less organized that it hardly had any capacity to participate in policy making on the EU level. In 1991-92 when the two defining regulations were decided by the EU Commission, organic farming covered about .2 percent of the total number of farms in EU member states (Foster & Lampkin, 1999). The design of the EU policies in the early 1990s was therefore strongly influenced by a loose and open network of member state administrators and very few other experts in organic food and farming – primarily found among the delegates of the International Federation of Organic Agriculture Movements (IFOAM).

During the 1990s organic food and farming grew within the EU (Lampkin et al., 1999) on the basis of interactions between market demand and political support (Dabbert et al., 2004; Michelsen, 2008, 2009), and in June 2004 the European Action Plan for Organic Food and Farming (EUOAP) was passed by the Commission (EC, 2004). It included 21 action points to be realized either by the Commission or by member states on the basis of funding taken from existing accounts of the CAP.

In order to analyze the potential involvement of stakeholders, it is worth using the distinction suggested by Michelsen et al. (2008a) between three main aspects of the EUOAP: i) the definition of organic food and farming through values and principles; ii) public goods delivered by organic food and farming justifying political support in general; and iii) market development aspects of organic food and farming in promoting a market and consumer oriented development of a small and developing sector within a highly organized food market in which supplies are strongly influenced by CAP payments to farmers. Each aspect relates to distinct groups of stakeholders, i.e. public agencies, non-governmental organizations and private business firms employed i) in defining and

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6 ‘Stakeholder’ is missing in the vocabularies of Hix (2005) and Nugent (2003).
certifying organic food and farming, ii) within the broad selection of environmental, health, animal welfare and other activities of public goods that may associate or be associated with organic food and farming, or iii) in the food market. Within each aspect it is even possible to distinguish between stakeholders with a purely organic basis and with a clearly non-organic/mainstream or mixed basis. Moreover, some stakeholders may appear more central to policy than others and perhaps with varying centrality when compared across the three aspects (Schmid et al., 2008).

In summary, stakeholders of the EUOAP include many others than the members of the exclusive policy community and closed network of the CAP. The additional stakeholders include policy makers and policy takers of both organic and mainstream food and farming that relate to the three aspects of the organic action plan: defining and enforcing definitional aspects, public goods aspects, and market aspects of organic food and farming. Some stakeholders, such as organic farmers, may be considered core stakeholders in all aspects, while others, such as non-organic food retailers may be considered stakeholders in the periphery of market aspects only. The topic of the following empirical analysis is to analyze the attempts made to involve this huge complexity of stakeholders in the policy process of the EUOAP, and to assess the impacts in terms of efficiency and legitimacy on formulating the EUOAP, on realizing EU regulatory elements of the plan, and on preparing for evaluations in member states.

**Empirical findings**

The empirical assessment of the contribution from stakeholder involvement on policy efficiency and legitimacy is divided into three parts. In the first part we give a general description of the background for developing the EUOAP and a judgment of its efficiency and legitimacy in terms of realized national organic action plans in EU member states. In the second part we compare stakeholder involvement in policy processes preparing and realizing the EUOAP on the EU level. The third part is about realizing the EUOAP in member states and summarizes experiences with attempts to involve stakeholders in preparing a toolbox for evaluating the EUOAP. In sum, the three parts illustrate a variety of ways to involve stakeholders, and their impact on policy efficiency and legitimacy. The data used include results from systematic attempts to involve stakeholders in related policy processes operating on different levels.

**Background for and results of the European Action Plan on Organic Food and Farming**

The idea of organic action plans was developed in EU member states during the 1990s (Michelsen et al., 2001; Stolze et al., 2006; Schmid et al., 2008). It was introduced on the EU level in 2001 under the Swedish EU presidency when the EU Council demanded the EU Commission to initiate an EU Organic Action Plan. Several member states gave the idea special support and the Danish Ministry of Food even stationed an expert to assist the Commission in realizing it (Per Ahle: personal communication). Within the EU Commission, the idea of organic action plans had gained support from an EU sponsored research project, OFCAP, on the political and economic development of organic farming (Dabbert et al., 1999-2002). The project included various analyses of the development potential for organic farming in the EU and suggested a path for organic farming growth (Michelsen et al., 2001).

In June 2004 the EU Commission passed the EUOAP (EC, 2004) and the Council and the Parliament approved it. The action plan implied that the EU Commission was to adapt some of its regulations, directives and policies, while member states were requested to voluntarily introduce national action plans. At the same time the EU Commission explicitly demanded knowledge on
stakeholder involvement in relation to realizing the EU OAP as spoken out in the tender of research projects to develop tools for evaluating the EU Action Plan (EC, 2003).\textsuperscript{3} Earlier on, the interest in stakeholder involvement had gained support by EU sponsored research on economic and political aspects of organic farming: The EU CEEOFP project on organic farming in Western, Central and Eastern Europe experimented with stakeholder involvement in developing policies in support of organic farming. In 2003-2004 the project arranged workshops in 11 old and new member states designed to promote capacity building and policy learning among stakeholders in organic agriculture (H"aring et al., 2009). A method of multi-stakeholder involvement was developed to promote actor networks capable of processing information and initiating political action. Some of these ideas were included in the research project chosen to develop the evaluation tools for the EU organic action plan (Schmid et al., 2008). Data obtained from this project are used in the analyses to follow.

By November 2008, the status of the EU OAP is that the EU Commission has made the main policy adaptations. Organic action plans have also appeared in member states, but far from all have adopted the idea (ORGAP, 2008). As fewer organic action plans in member states indicate a lower level of policy efficiency and legitimacy, it is worth to specify the record so far before analyzing the impact of stakeholder involvement.

Before the EU Action Plan was passed in 2004, organic action plans had been realized or were under way in six member states: the Czech Republic, Denmark, Germany and Italy had national action plans, while action plans for one region had appeared in Spain and the UK (Stolze et al., 2007). In November 2008, 12 national action plans were found, among which nine had been established after 2004 and three had been prolonged, and three member states prepared activities considered less ambitious than action plans (ORGAP, 2008). Moreover, 10 regional action plans were found (in Spain six regional plans came in addition to a national plan) – all except one developed after 2004. Among the older member states of EU15, 10 member states had action plans (eight with national and two with regional ones), while only four of the newer 12 member states had action plans (all national ones). A curious finding is that Denmark – a main advocate of the EU OAP – has not developed new plans after the most recent one ran out in 2003 although Danish researchers have documented needs for it (ICROFS, 2008). In the UK, another old EU member state, three of four regional action plans have now been terminated. In sum, the results in terms of realized action plans hint at only a moderate level of efficiency and legitimacy for the European organic action plan in member states. Stakeholder involvement has played a role in various parts of the policy processes and we will now consider its contributions to the ambiguous result.

\textbf{Policy processes on the EU level}

When assessing the importance of stakeholder involvement on the policy processes of the EU OAP on the EU level, it is possible to distinguish between four separate processes: 1) the upload of member states’ policies to the Commission and setting the agenda for the Action Plan during 2001-04; 2) the definition of action points in 2003-04; 3) implementing the EU OAP by amending the EC Reg. 2091/92 defining organic production in 2005-07; and 4) implementing the EU OAP by introducing EC Reg. 889/2008 on labeling and an associated information campaign in 2007-08 (Michelsen et al., 2008b). Together these four processes represent very different situations, with member states most actively involved in the first one, while private organic interests may consider the last two processes decisive for their capacity to keep an identity as organic producers and traders and avoid competition from outsiders – whether non-organic or non-EU organic producers/traders.

\textsuperscript{3} It was a clearly stakeholder-based concept supporting the implementation of the European Action Plan for Organic Food and Farming tendered as a Specific Support Action Project, under “Priority 8.1 Policy oriented research” under the 6th Framework Program of DG Research (Call identifier: FP6-2003-3; published on 10 October 2003)
During the 1990s, the EU Commission had established an administrative structure on organic farming including an organic unit within DG AGRI, and two committees. The Special Committee on Organic Farming includes only administrative staff from member state agricultural administrations while the Advisory Committee on Organic Farming includes EU level representatives of general organizations of stakeholders such as farmers (COPA), the food industry (COCEGA) and consumers (BEUC) in addition to representatives of the organic sector recruited from the IFOAM EU group.

On the scale of stakeholder involvement, the Special Committee has a high score of closed network on all dimensions: the selection of stakeholders is very exclusive; the depth of involvement includes formulating policy problems and solutions; and the stakeholders involved have relatively high control over the policy process. In addition, only policy makers are involved and as ministerial staff they seem not to belong to the core of any of the three dimensions of the EUOAP. The Advisory Committee on the other hand is less closed, but not a fully open network: selection is exclusive but encompassing; involvement includes more consultancy than policy formulation and participants do not control the policy processes. Moreover, although the Advisory Committee only includes policy makers (in organizations representing beneficiaries) they represent organic and non-organic stakeholders central to all three aspects of the organic action plan. The level of stakeholder involvement can be measured on the basis of the extent to which the two committees have been involved in preparing policies of the organic action plan: The more the Advisory Committee is involved the less closed the network of stakeholders involved.

In the first policy process, member states uploaded policy experiences to the Commission and attempted to set the agenda of the Action Plan. It took place after the Council (i.e. the member states) had demanded an initiative from the Commission and was rather chaotic as member states tried to gain influence through other channels than the Standing Committee. Austria held a public hearing involving commissioners and employees in the Commission, and Denmark stationed a public servant to assist the Organic Unit in DG AGRI. DG AGRI on its side appointed a group of external experts to develop the action plan. The Advisory Committee was not involved formally, but members of the IFOAM EU group were involved through informal consultations (Michelsen et al., 2008b). Although member states initiated agenda setting, the control over the agenda setting process thus remained with the Commission and DG AGRI as the Standing Committee was not deeply involved, and experts were at the exclusive service of the Commission.

The definition of action points was dominated by DG AGRI that took some advice from the Standing Committee and external experts. In the beginning of 2004 – i.e. a short time before the EUOAP was passed in the Commission - two procedures of public consultation were made. The first one was a public internet consultation initiated by the Commission. It addressed all with an interest in the issue and not only the privileged stakeholders in the Standing and the Advisory Committees. In this ‘network’ there was no selection of stakeholders and it served only consultation purposes and stakeholders had no control over the policy process – but many organic stakeholders central to organic food and farming did actually participate. Later on, the outline of the EUOAP was presented at a public hearing including a broad selection of stakeholders from both the center and the periphery of the three aspects involved. The hearing hardly served any purpose of consultation as it mainly communicated the opinion of the Commission. The process thus combines the two extremes on the scale of stakeholder involvement: a much closed network in the first part and
access so open that it hardly constituted any network at all at the end of the process (Michelsen et al., 2008b).

**New regulations**

After passing the EUOAP, the EU Commission was to realize its parts. The first efforts concerned the amendment of the regulation defining organic production. The original plan was to have the new regulation in force by 2007, but the process was delayed due to a change of procedure in June 2006 that opened up a much closed network. In the initial process the member states and the Commission prepared the new regulation in a Council working group including high rank agriculture administrators with peripheral experiences in organic food and farming. This proposal appeared in December 2005 and was sent to the Standing Committee - not on Organic Farming - but on Agriculture in general (a much closed network of member state officials emphasizing general agricultural views rather than organic sector views). In spring 2006, the proposal for a new regulation was subject to a hearing in the EU Parliament and the Austrian presidency pushed for a final decision to keep on schedule (Michelsen et al., 2008b).

At this stage, however, the proposal had released much criticism from purely organic stakeholders organized in general or specialized certifying organizations, and the policy process halted. Now, the presidency took over the process of reaching a compromise with the Parliament. DG AGRI assisted by initiating several high level contacts between the Commission and the IFOAM EU group who in turn organized a public consultation on the internet via a special homepage with updates on the revision process. The Advisory Committee was also involved, and selected member states such as Germany and France contributed to formulating compromise proposals (Michelsen et al., 2008b). The first stage was dominated by a very closed administrative network with stronger relations to the general agricultural sector than to the organic one. It lost control over the policy process and was replaced by a more open network in which purely organic stakeholders participated together with some member states gained access to formulating policy problems and solutions. While the initial network only included high ranking policy makers with rather peripheral stakes in the issue of defining organic food and farming, the final network included policy makers with stakes central to the issue in question.

The last policy process analyzed here is about the introduction of a new EU label for organic food and farming and an information campaign (Michelsen et al., 2008b). While the definition of organic agriculture is about identity, labeling and information campaigns relate to business economy. The process started in June 2007 and ended in December 2008. The Standing and the Advisory Committees of Organic Farming were both involved, and in addition DG AGRI held regular discussions with the IFOAM EU group. In addition, various initiatives were organized including internet consultations with restricted access only for stakeholders considered relevant and public consultations organized by the members of the Advisory Committee. Finally, a working group was formed to follow the information campaign. It organized a webpage with information material and options for comments. In this process, the non-governmental and purely organic sector representatives gained access to the processes of formulating policy problems and solutions and they even gained control over minor parts of the process such as organizing discussions and publishing materials on how the new regulation should be implemented (Michelsen et al., 2008b). It seems that in this process, the EU Commission was in full control of the policy process at the same time as it was capable of living up to ideas of involving stakeholders, although primarily those of the purely organic sector.
In summary, the four policy processes relating to the EUOAP illustrate a development through different levels and types of stakeholder involvement. Several policy makers in member states tried to influence agenda setting but in the end the Commission and DG AGRI did not involve any national stakeholders whether committee member or not. When defining the contents of the EUOAP, two opposite extremes in stakeholder involvement were combined: DG AGRI took some advice on policy contents from the closed network of the Standing Committee on Organic Farming and a group of external experts, and combined it with consultancy through open access. Finally, the two processes by which the Commission realized its part of the EUOAP illustrate a dramatic shift away from a closed network without direct contact to purely organic stakeholders. The first step was to involve main representatives of purely organic stakeholders central to the issue of the new regulation on organic food and farming. The most recent step was to give privileged access to non-governmental and purely organic stakeholders to policy making and even to control of some parts of the policy process on labeling and information. In sum, the four processes appear steps in a sequence by which purely organic stakeholders gained a position coming close to that of a closed network in EU organic policies. The involvement of stakeholders external to the Commission thus changed from nothing via a closed network of member state administrators to a closed network with privileged access to purely organic non-governmental stakeholders. This ambiguity seems a reasonable explanation for the ambiguity in the realization of organic action plans in member states up to now. But we have access to data on stakeholder involvement in member states relating to the EUOAP policy process via the project on developing a toolbox for evaluating the EUOAP.

Involving stakeholders in evaluation on national level

The EU funded research project, ORGAP (www.orgap.org) was to develop a toolbox for evaluating the EUOAP in a way that investigated the options for involving stakeholders in policy and in evaluation. The project was aiming at “…a true partnership approach between public and private sector organizations, and in particular the participation of organic farming organisations on an equal basis with other stakeholder organisations is seen as essential. This project will involve these organisations and the other main stakeholder groups at the national (…) level…” (Technical Annex of ORGAP).

The aim was realized by inviting national stakeholders in eight EU member states experienced in developing organic action plans to participate in group work. The eight member states included the Czech Republic, Denmark, Germany, Italy, the Netherland, Slovenia, Spain, and the United Kingdom (represented by England). They represent variation in terms of political and economic legacy and in terms of experiences with the EU and organic food and farming. In each member state, a national research team invited stakeholders to participate in two group activities organized on the basis of strict common guidelines: 1) a workshop on the interaction of the EUOAP and existing national action plan, and 2) a focus group on implementation problems of introducing the EUOAP in the national contexts.

The aim of the project was to realize an open network approach to stakeholder involvement in groups. Although the number of participants in each group was limited, the criteria for selecting participants on both occasions in each member state aimed at including representatives of the non-organic sector. This aim was not realized, though. As the problem appeared in similar ways on the
two occasions in all eight member states, we suggest it signified a general problem of stakeholder involvement rather than a problem of our design of group work.

### Stakeholder workshops

The series of stakeholder workshops was held in April 2006, i.e. two years after the release of the EUOAP and at the time when criticism of the new EU regulation defining organic food and farming was intensifying on the EU level. The purpose of the workshops was to assess the fit between the EUOAP and national policies, to discuss the main objectives of the EUOAP, suggest indicators for evaluating them, and to get some indications on conflicts and synergies on the national level that might influence implementation (Nicholas and Lampkin, 2006). Additionally, the workshops intended to serve as a platform for participants to exchange ideas on organic farming politics and an option for initiating national policy networks on issues related to the EUOAP.

Regarding stakeholder selection, the national research teams were asked to invite politically experienced representatives of some stakeholders with a purely organic background and of others with a mixed or non-organic background (Lampkin & Michelsen, 2006). The common selection criteria included stakeholders ranging from public policy makers and administrators to policy makers among representatives of producers and other market actors. Not all categories needed to be included in each case as the main aim was to optimize the group’s analytical capacities and delivery of relevant information regarding the EUOAP in the national context. When assessing the actual composition of workshops, it appeared that no purely non-organic participants had been recruited at all and only few with a background in public goods – all of which belonged to the group of active supporters of organic food and farming. Four categories were represented in nearly all eight countries: Training/extension, research, certification and public administration. A breakdown of participants indicates that certifiers and researchers were overrepresented, whereas producers, policy takers and consumer organizations/agencies were underrepresented (Nicholas and Lampkin, 2006). The bias towards closed networks of organic farming was not the result of lacking efforts in national teams but of self selection since invited persons refused or simply stayed away.

In what concerns the depth of involvement of stakeholders, the intention of the workshops was to consult participants expected to be familiar with the level of national conflicts and the problems involved in defining policy objectives and evaluation criteria. In practice, however, conflicts in perceptions of the EUOAP and national plans were not identified within the workshops. Perceptions only differed between the eight workshops held and reflected differences in perceptions between member states rather than between types of stakeholders within member states. Moreover, the stakeholders only appeared able to formulate rather superficial evaluation criteria and indicators in spite of their experiences and common perceptions (Nicholas & Lampkin, 2006).

The design of the workshop gave researchers control over the evaluation process and participants made no attempt to take control over the evaluation toolbox. Rather, the participants wished to form policy networks and seek influence on national and EU policy making relevant to organic action plans. Most radically, the participants in the German workshop demanded the local researchers to publish a paper discussing the (from the participants’ viewpoint) lack of stakeholder involvement in the ongoing policy process on amending the EU regulation defining organic food and farming: “The workshop corroborated the urgency to debate the revision of the organic regulation …” (Nicholas and Lampkin, 2006; Eichert et al., 2006). In the German case, the closed network thus began to act like a policy community as defined by Marsh & Rhodes (1992).
In summary, self-selection undermined the attempts to establish open networks combining organic and non-organic stakeholders central to the three aspects of the EUOAP. Closed networks characterized by consensus resulted in all eight cases. These self-established closed networks could have realized deeper stakeholder involvement than intended, but the workshops only produced rather superficial evaluation criteria. Regarding control of the evaluation, the aims of the open network approach was realized due to participants’ preferences for influencing policy rather than evaluation. This may have contributed to the unsuccessful realization of the purposes of the workshops.

**Stakeholder focus groups**

The series of stakeholder focus groups was held between November 2006 and February 2007, i.e. at a time when the new regulation on organic food and farming on the EU level had not yet been passed, but criticism from the organic sector had been complied with by increased cooperation between IFOAM and the EU policy making system. The new label and information campaign had not yet materialized on the EU level. The purpose of the focus groups was to specify problems in relation to the future implementation of a) the amended regulation and b) economic aspects of the EUOAP (Michelsen and Tyroll Beck, 2007).

The selection of stakeholders was based on the invitations sent by national research teams to representatives of stakeholders performing functions important to the implementation of national policy programs relating to the EUOAP. They included administrators in charge of the policy programs and representatives of producers, traders, information and extension services, consumers and still others targeted by the policy programs or involved in communication with target groups. Once again, it was emphasized that all focus groups should include representatives of organizations to whom organic food and farming played a minor role. Moreover, the focus groups should combine policy makers working with political aspects with representatives of policy takers i.e. target groups of organic food and farming policies.

This time the composition of the focus groups was also biased by self selection. Despite all efforts, none of the in total 84 participants had a purely non-organic background and only few came from organizations with preferences for non-organic activities. The balance between policy makers and policy takers within the focus groups varied from two focus groups without any participants representing only target groups, to two focus groups with only one participant representing policy makers. The inclusion of more policy takers implied that the focus groups were less closed networks than the stakeholder workshops.

On purpose, the focus groups were not deeply involved in designing the evaluation toolbox. The participants only discussed possible implementation problems and their ideas to cope with them. Once again it appeared almost impossible to provoke any conflicts within the groups for instance between policy makers and policy takers. Rather, common perceptions developed in each focus group on the most important national implementation problems and ways to cope with them. The methodology used to analyze the data compensated for this by decontextualizing each statement within the focus groups and process them within a framework of implementation theory. In this way we produced a catalogue of problems associated with implementing the EUOAP. Although the participants in focus groups appeared more interested in policy, researchers kept control over the evaluation toolbox and were not asked to take political action (Michelsen and Tyroll Beck, 2007).
The attempts to realize the open network approach to stakeholder involvement in the focus groups on implementation failed on the selection of stakeholders, while it was realized on depth and control of evaluation. The consequences for the analysis were that it did not include any information on the type of implementation problems realized by stakeholders with no or low preferences for organic food and farming. This had more negative effects on the analysis of implementation problems relating to the economic aspects of the EUOAP than to the amended regulation because non-organic stakeholders have peripheral roles in defining organic food and farming, while their roles are central with regard to the economic aspects of the agriculture and food sector and thereby the EUOAP. This difference was not visible in the deep analyses of the two themes.

What appeared from the decontextualized analysis of all statements across themes and focus groups were expressions of a rather fundamental skepticism to the ideas behind the EUOAP. In spite of EUOAP’s explicit goal of supporting the development of organic food and farming, participants considered the socio-economic context and the idea of increasing market transparency negative to organic food and farming. Finally, even the intended results of implementing the EUOAP were expected to have negative impacts on organic food and farming (Michelsen & Tyroll Beck, 2007). The deep analysis thus revealed that the organic stakeholders participating in the focus groups in general did not consider the EUOAP legitimate as they feared policy efficiency rather than wished to promote it.

Discussion

The theoretical background for the empirical investigation of stakeholder involvement in EUOAP on the levels of the EU and member states was to investigate the open empirical question whether the involvement of a wide range of stakeholders in policy processes would in fact increase policy legitimacy and efficiency. The EUOAP was considered a critical case in methodological terms because it on the one hand was known to have realized stakeholder involvement in all stages of the policy process while it on the other hand involved opposition between a well established agricultural policy community and loose networks of purely organic stakeholders. In total, the relevant stakeholders summed up to include a huge complexity which it seemed difficult to involve in a meaningful way.

The empirical analyses illustrate various levels and types of stakeholder involvement in all stages from policy initiation to development of an evaluation toolbox. In general the complexity of stakeholder involvement was coped with by involving more narrow ranges of stakeholders than suggested by the theme. The composition of stakeholders involved resembles closed networks much more than the open networks indicated when the EU talks about involving a wide range of stakeholders. But the composition of stakeholders varied much between the stages investigated. The Commission kept all national stakeholders off agenda setting, and the formulation of EUOAP contents primarily involved a closed network of experts. The realization of the EUOAP through two regulations illustrates a dramatic shift from involving a closed network of general agricultural policy stakeholders without direct contacts to organic food and farming, to giving privileged access to a closed network combining member state organic experts with representatives of a specific organic sector apex organization. The general EU agricultural policy community was effectively kept off the EUOAP and a closed EU network on organic policy appeared. In principle the ambiguities involved in this process may explain the ambiguities in the level of member states’ realization of national organic action plans. But the analyses of stakeholder involvement on the national level suggest that a less ambiguous process of stakeholder involvement would not have made the EUOAP more legitimate or effective.
Researchers attempted to involve a broad range of stakeholders in eight member states on two occasions preparing for the evaluation of the EUOAP, but in all cases rather similar and closed networks appeared through self selection that excluded non-organic private sector stakeholders. It remains to be seen whether the ORGAPET evaluation toolbox is utilized more than toolboxes developed with less stakeholder involvement or involving less closed stakeholder networks. The analyses of the stakeholder inputs to the evaluation toolbox suggest that stakeholder involvement has not endowed the EUOAP with legitimacy and efficiency not even in these cases of closed national organic sector networks established in member states with organic action plan experiences. The participants of the workshops and focus groups expressed direct and indirect opposition to the EUOAP. Although this may have been influenced by the ambiguities of the policy process on the EU level, it seems anyway implausible that the fundamentally, negative perceptions of legitimacy and efficiency could be off set by any additional stakeholder involvement alone.

The EUOAP was considered a critical case of stakeholder involvement and the results indicate that the EU only realized various types of closed networks that appeared unable to produce legitimacy and efficiency of a policy even within the delimited sector of organic food and farming it aimed to support. On the issue of the composition of stakeholders to involve, the findings highlight two aspects of the theoretical discussion: Greene’s (1997) attention to the needs for including a level of interest representation and conflicts among stakeholders when using stakeholder involvement to increase policy legitimacy and efficiency, and the attention of network theory on closed networks’ potential dominance over certain policy areas.

The analysis confirms both reservations to involving stakeholders through closed networks and illustrates at the same time the difficulties of avoiding closed networks. The analysis suggests two explanations for the difficulties: existing general stakeholder networks may have only little legitimacy on the issue - as had the general agriculture policy network on the EU level – or closed networks may develop through self selection – as in the cases of stakeholder involvement in member states. On both the EU and the national level it was difficult - if not impossible - to involve a broad range of stakeholders. In the toolbox developed in the ORGAP project, the consequence of the absence of other than purely organic stakeholders was to suggest evaluators to interview non-organic stakeholders on an individual basis before finalizing the evaluation (Schmid et al., 2008). This advice is less legitimate though when trying to overcome disadvantages caused by self-selection in policy making.

Against the criticisms of the closed networks mentioned here, it may be argued that the organic food and farming sector - when compared to the general EU agricultural policy community – is a good example of unprivileged stakeholders that some theories of participatory evaluation wish to consider in terms of empowerment. The analysis presented here adds nuances to this analysis. First, the organic food and farming sector did not appear powerless since it was able to act on the EU level and send representatives to the group works on the national level, although the organic sector in old member states disposed over significantly more resources than the organic sector in new member states. Second, the national organic sectors neither recognized nor used the opportunity for influencing the evaluation toolbox via the group work as a means to become empowered when it realized that closed networks had been established through self selection. Rather than attempting to influence evaluation they preferred to influence policy – and eventually they expressed a deep mistrust in policy.
Finally, the organic sector’s mistrust in the EU policy seems related to the fact that the EUOAP was to be financed by existing accounts within the CAP. The small and loosely organized organic sector was to bargain with the privileged closed network of agricultural policy over allocation of resources – and the organic sector had mainly negative experiences from earlier bargaining with the general agriculture sector over pecuniary aspects when transposing EU regulations (Michelsen, 2009). To the EU Commission, however, the financial model was made to install the EUOAP as part of general attempts to increase the market orientation of the CAP – and hence the CAP’s legitimacy and efficiency. Hence an ironic perspective appears: The Commission developed the EUOAP as part of macro political attempts to increase the legitimacy and efficiency of the CAP - partly against the will of the dominant agricultural policy community – and promoted broad stakeholder involvement in the EUOAP, which has ended up in closed networks of organic stakeholders on EU and national level that appear unable and unwilling to legitimize market oriented organic action plans. The closed network of the CAP is now supplemented with closed networks of purely organic stakeholders with sector oriented policy ideas, which seem unsuited for realizing the macro political demands to improve legitimacy and efficiency of the CAP.

Conclusions

Stakeholder involvement has developed as an instrument in EU policy making and evaluation as a remedy against problems of obtaining policy legitimacy and efficiency. It is a well defined instrument in evaluation theory while it lacks theoretical specification in political science. The purpose of this paper was to make an empirical assessment of stakeholder involvement’s presumed contributions to policy legitimacy and efficiency on the basis of combined aspects of evaluation theory and political science. A distinction between closed and open networks of stakeholders involved was developed. It combines theories on participatory evaluation and policy networks and specifies that stakeholders may relate to various aspects of a policy program and that specific stakeholders may appear central or peripheral to attempts of seeking policy legitimacy and efficiency.

Available assessments of the impact of participative evaluations on evaluation utility (legitimacy and efficiency) are inconclusive because closed networks did not have the expected effects. We reached a similar conclusion in our assessment of the impact of stakeholder involvement in all stages of the policy process of the EUOAP. Although relatively closed networks appeared in policy making in terms of stakeholder selection, depth of involvement and control over the policy process, the EU member states have not introduced the suggested national organic action plans in an unambiguous way. Several member states have not yet introduced an organic action plan and among member states with experiences from this type of plans some have not reintroduced them on the occasion of the EUOAP. In addition, the stakeholder involvement in EUOAP on EU level has not released legitimacy and efficiency among the core stakeholders involved in evaluations in member states although they by self selection represented closed networks.

In conclusion, the findings suggest that the involvement of a broad range of stakeholder in any part of the policy process does not appear to be an effective and pragmatic solution to the EU’s problems of policy legitimacy and efficiency in all situations. One problem is that stakeholder involvement in the case analyzed here was unable to deliver high and unambiguous levels of legitimacy and efficiency. Other problems included that it appeared very difficult to realize ideas of involving a broad range of stakeholders as well as ideas of making closed networks of (unprivileged) stakeholders deliver legitimacy and efficiency. In sum, stakeholder involvement is in
practice not only a practical solution to problems of policy legitimacy and efficiency. At least in the critical case presented here, stakeholder involvement introduced additional problems of legitimacy and efficiency rather than reducing them - on sector level as on the macro political level.

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Table 1. A scale of stakeholder involvement in open and closed networks

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<thead>
<tr>
<th>Dimensions of stakeholder involvement</th>
<th>Open network</th>
<th>Closed network</th>
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<tbody>
<tr>
<td>Stakeholder selection</td>
<td>Low: Open access</td>
<td>High: Privileged access</td>
</tr>
<tr>
<td>Depth of stakeholder involvement</td>
<td>Low: Consultancy/ hearings</td>
<td>High: Formulating problems and solutions</td>
</tr>
<tr>
<td>Stakeholder control over policy process</td>
<td>Low: Control remains at formal initiator</td>
<td>High: Control at stakeholder Network</td>
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