28

STRATEGIC FRAMING AND THE EUROPEAN COMMISSION

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Introduction

How do strategically oriented actors shape policy outcomes in political systems characterized by diffused authority, institutional fragmentation, and competing networks? Polemic debates in the 1990s privileged either the material resource of powerful actors or the “softer” processes of arguing and persuasion amongst relatively equal policy participants. Today those somewhat artificial debates have given way to combined approaches which try to account for both strategic intent and discursive persuasion. This chapter presents one such approach: strategic framing. Even governmental actors seeking preferred outcomes know they cannot force decisions through by dictate. They must build supportive coalitions, shape institutional environments in conducive ways, and craft a powerful narrative around certain outcomes. They often do so, this chapter maintains, by building a conceptual frame for policy choice, characterized by a particular problem definition, a rationale for action, and a preferred policy solution. Strategic framing is neither purely discursive nor purely instrumental: it is intended to shape policy deliberation in certain directions, but sometimes over long periods of time and not always in ways that framers envision.

A strategic framing approach is useful for disentangling policy shaping processes in the kinds of political systems described above, and the European Union (EU) certainly qualifies in that respect. The EU political system, as a quasi-federal “state-like” system (Richardson 2015), is designed so that no single institutional actor wields absolute power, a multitude of actors have access to policy forums, and policy change must be motivated in ways that appeal to a swathe of wider arguments. This makes the EU a rich laboratory in which to study strategic framing, and indeed, organizational actors like the European Commission have been analyzed using the approach (Rhinard 2010). This chapter demonstrates what strategic framing is as a conceptual apparatus (sections two and three), before then discussing why studying the Commission through the strategic framing approach can be so analytically fruitful (section four).

Strategic framing: theoretical foundations

Strategic framing is an analytical concept that helps to unpack the actors, institutions, and ideas involved in shaping policy outcomes in complex policy processes. Policymakers are quite
Strategic framing and European Commission

unlikely to articulate their actions as “strategic framing,” of course. It is an analytical device – as presented below, a conceptual apparatus – that can be used by researchers to highlight essential determinants of outcomes without prioritizing interests over institutions, for instance, or ideas over interests. More theoretically, and indeed, ontologically, the concept allows us to bridge analytical approaches which prioritize structure over agency, or vice-versa. At first glance, strategic framing sounds very instrumental and rational, and to an extent it is. Yet the approach starts from an institutionalist understanding that actors in policymaking systems are embedded in and circumscribed by a normative structure. That structure includes a shared meaning system and collective understandings, usually built up over time, which guide action. Understanding the normative structure, according to this line of thought, helps to explain outcomes: actors behave in line with shared understandings, shaping public policies in ways deemed appropriate within a given normative structure (Jones & Baumgartner 2005; Jepperson 1996; Hall 1993). Hall emphasizes the importance of this normative structure as a context for policymaking when he tries to explain the take up or failure of Keynesian ideas about the economy. He writes that “policymakers customarily work within a framework of ideas and standards that specifies not only the goals of policy and the kind of instruments that can be used to attain them, but also the very nature of the problems they are meant to be addressing” (Hall 1993: 279).

These are critical insights, and serve as the foundation for the approach developed in this chapter. The problem with carrying out this line of argument to its logical conclusion, however, is that actors become mere products of the system. They are bearers of structure in a way that rob them of the potential for intentional action. Explaining policy outcomes solely as the result of structural constraints misses out on some of the fascinating dynamics at play in policymaking. We can move toward a theory of action if we appreciate that most constructivist and institutionalist approaches probably exaggerate the integrity of normative structures. Those structures are not inert, but in fact become part of the contestation process that characterizes policymaking. Actors often battle over what should be the shared meaning systems and collective understandings that guide policymaking, rather than following existing systems blindly. Barnett argues, “as actors vie over particular policies they frequently desire to change the social rules and norms in order to make a particular policy or outcome more legitimate and acceptable” (Barnett 1999: 7). The strategic framing approach responds to Campbell’s call to recognize the “self-conscious capacity of actors to engage in deliberate and creative transposition . . . [thus] to inject agency into structural explanations and develop a more refined and dynamic theory of action” (1998: 383; see also Campbell 2004).

In short, strategic framing aims to account for both structure and agency in shaping outcomes, albeit doing so in an empirically verifiable way (see also Ripoll Servent & Kostakopoulou 2016; Barnett 1999). It is not entirely on one side or the other: structures can be changed through instrumental action, but not always in predictable ways and usually only over time. The next section outlines the approach, showing its key contributions to existing literature, its main assumptions, and its component parts.

**Strategic framing: the approach**

Strategic framing is the deployment of certain ideas about policy change – including the depiction of a policy problem, a rationale for action, and a set of “appropriate” solutions – in order to reshape the existing ideas, actors, and institutions inside a particular policy domain. As suggested above, strategic framing offers a useful way to cut through the material/ideational debate in public policy studies and to bridge the agency/structure divide by illustrating how policy ideas become resources in competitive public policy shaping processes.
Policy frames

The strategic framing approach starts with the concept of the “policy frame,” which Goffman defined as a “schemata of interpretation” that allow individuals or groups “to locate, perceive, identify, and label events and occurrences, thus rendering meaning, organizing experiences, and guiding actions” (Goffman 1974: 21). The concept has gained analytical currency in recent years in the fields of political science (König 2006), sociology (Snow & Benford 1988), media studies (Entman 1993), economics (Tversky & Kahneman 1990), and psychology (Surel 2000). For the most part, framing scholars attribute a tripartite account of a frame’s function. First, a frame provides a diagnosis of some event or aspect of a policy issue as problematic. It offers a problem formulation that specifies what (if anything) is at issue. This is the core point of the literature on “problem definition” (Rochefort & Cobb 1994) and “agenda-setting” (Peters 1994), as well as the classic argument by Schattschneider that “the definition of alternatives” is a critical part of policymaking (1960: 68). Second, a frame offers an apparent solution to the diagnosed problem, specifying what needs to be done. Hall argued that certain ideas in the policy process stipulate how a problem should be addressed, including “the goals of the policy and the kind of instruments that can be used to attain them” (Hall 1993: 279). Third, a frame provides a seemingly clear motive or justification for action; or, as Snow and Benford put it, “a call to arms or rationale for engaging in ameliorative or corrective action” (1988: 199). This last component is largely normative in orientation, offering symbols, scripts, “generative metaphors,” and “problem-setting stories” which appear to validate problem formulations and preferred solutions (Schön & Rein 1994: 29). A policy frame functions not only to help actors interpret situations, but also to assist them in acting upon those situations.

The literature diverges in the extent to which authors understand frames as operating in the cognitive foreground or background of actors’ behavior. Much literature, especially in EU studies, takes the latter position: frames are tacit, and guide behavior without conscious reflection on the part of policy actors (see, for instance, Mörth 2000; Dudley & Richardson 1999; Lenschow & Zito 1998). This position neglects the fact that (at least) some actors are sufficiently aware of the frames operating in a policy domain, and are cognizant of their strength in shaping behaviors. Thus Weiss argued that more research should be devoted to understanding how problem definition can become a “weapon of advocacy and consensus” (Weiss 1989: 117), and Daviter (2007) makes the case that competitive framing is an important part of policy processes (see also Schön & Rein 1994). Strategic framing, as a concept, falls within that camp — but it is an empirical question as to what degree frames are “foregrounded” in the behavior of certain officials.

Where this latter literature falls short, however, is explaining, first literature falls short, however, is explaining, first, how frames are developed, borrowed, adjusted, and reformed, and, second, precisely how frames are wielded in policy competition. After a brief word on frame development, this chapter then turns to how frames are deployed.

Frame development

Frames emerge mainly, but not entirely, through manipulation by actors. The constituent elements of a frame, including rhetorical scripts, generative metaphors, and understandings about cause-effect relationships, may derive from broader ideational frameworks that previously exist in a society. But in developing a frame, an actor must exercise intention to recombine those already existing elements — a process Douglas calls “bricolage” (1986). Social movement theorists emphasize that frames are “flexible and situationally influenced constructs” which
“can be adjusted to the relationships among collective actors, opponents, and third parties at a particular time. A political opportunity may crystallize an existing frame or enable movement entrepreneurs to extend it to encompass new goals or subjects” (Tarrow 1992: 190). In a similar vein, Schön and Rein argue that “frame reflection,” when actors involved in a policy conflict consciously assess their respective frames, may lead to a consensual construction of a new frame which encompasses previously incompatible ones (1994: 40). Snow et al. demonstrate that frames are adapted to match a particular situation, a process called “frame alignment” (1986). In each of these theoretical approaches, the development of new frames appears to be an intentional and conscious effort.

What might the “ideal” frame design look like? This may depend on the purpose toward which the frame is being used. As outlined below, strategic framing involves the use of frames to build coalitions, alter institutions, and align policy choices with broader values. On the first point, we might expect that an effective frame will be constructed broadly enough to be accessible to a “myriad of interpretations by actors” (Fligstein 2001: 266). Some degree of ambiguity permits the coalescence of actors with varying policy approaches under an inclusive “tent.” This explains why many authors argue that frames can be portrayed in simple terms as “slogans” (Fligstein 2001: 266), “generative metaphors” (Schön and Rein 1994: xviii), and “stories” (Tarrow 1992). Barletta, too, suggests that frames are often ambiguous and that actors articulate them with some degree of imprecision. While this may lead to scholarly skepticism as to the importance of ideas in political explanation, Barletta argues that in the “real world” this practice is intentional; broadly articulated images, ideas, and symbols are “fundamental to mobilizing broad coalitions” (Barletta 2001: 10; see also Béland 2009). Finally, with respect to ideational alignment, a frame which links policy choices with widespread and popular social values will offer frame entrepreneurs more influence over policy change than frames which cannot make similar linkages.

Frames are produced mainly at the domain, or sub-systemic, level: both a level of analysis and the place where the “policy game” is played (Richardson 2015) since it contains the networks, institutions, and ideas which combine to shape policy-specific outcomes. A “policy domain” refers to a social space in which actors gather to participate in policy deliberation, with the goal of affecting the content of legislation or agreement (Fligstein & McNichol 1998: 61). Domains are dependent upon a larger political entity but function with a high degree of autonomy; they process all the policies associated with a general issue or sector, such as agriculture, biotechnology, transport, etc. (Fritschler & Hoefler 1996). It is useful to see domains as populated by actors, structured by institutions, and dominated by certain ideational perspectives on a policy problem and the goals of a policy.

Crucially, the strategic framing argument rests on the premise that domains are not immune from manipulation by policy entrepreneurs. Indeed, as the sections below demonstrate, actors can use frames in the effort to draw together new coalitions, build or alter institutions, and realign ideational frameworks. As Jacobsen argues:

Elites and non-elites constantly “work” their environments; that is, they strive to manipulate the material and ideational elements available in their organizational and cultural contexts to protect or further their concerns, and they are usually only too well aware that their opponents do, too.

(1995: 308)

Frames can be conceived analytically as resources for actors engaged in the goal of “working” their domain context in a manner that privileges certain outcomes over others. They are a
tool to manipulate that context and its core elements, including relevant actor networks, the institutions that guide action, and the links between policy ideas and broader societal values. Such opportunities may not be quite as constant as Jacobsen argues, since domain stability is more likely the norm (Baumgartner & Jones 1993). But when new policies are initiated (e.g., biotechnology regulation in the 1990s) or external shocks disrupt the status quo (e.g., counter-terrorism in the 2000s), opportunities certainly arise. The subsequent sections explain how strategic framing can be employed during such opportunities.

**Wielding frames: coalition building**

The first aspect of strategic framing turns our focus to the interlinkages of frames and policy coalitions or networks. Studying policy networks is crucial to understanding policy outcomes in complex, fragmented organizations of any sort (Richardson & Jordan 1979). Yet the literature shows that networks can be difficult to form and, once created, to maintain. The argument here is frames can be used by strategically oriented actors to both construct and maintain networks in complex organizations like the EU. Frames engage new constellations of actors, link actors’ conception of interests so as to induce cooperation, and can help actors working through coalitions over time. These three arguments are explored below.

First, frames help to illuminate potential constellations of interest in a policy debate. This “signaling effect” can be traced to the literature on issue definition (Rochefort & Cobb 1994) and social movements (Snow & Benford 1988). Schattschneider argued that actors able to control the “scope of politics,” by managing the expansion or contraction of participation, gain the political upper hand. This is done partly by constructing policy alternatives, what Schattschneider describes as “the supreme instrument of power” (1960: 68). Rochefort and Cobb build on this insight to argue that the way an issue is defined and portrayed is “crucial to the development of conflict because... the outside audience does not enter the fray randomly or in equal proportion for the competing sides. Rather, the uninterested become engaged in response to the way participants portray their struggle” (1994: 5). Portraying an issue in a certain way, then, either by defining it or redefining it along different lines, can be used as a strategy against opponents to gain political advantage. This is consistent with Nelkin’s work on issue expansion (Nelkin 1975). She finds that actors may define issues in procedural or narrow and technical terms in order to restrict participation, while opponents may connect issues with broad concepts in order to encourage participation by previously excluded groups (see also Kingdon 1995: 109–113). Since policy frames convey a particular image of a policy problem, and thus imply certain definitions and alternative solutions, the use of a policy frame leads to the activation and engagement of different constituencies.

Second, frames help induce cooperation. Collective action theory and network analysis reminds us that drawing coalitions of like-minded actors together faces a host of challenges. Frames can help with the construction of new coalitions following the widening of relevant audiences discussed above. Social movement scholars show how frames and framing efforts allow movement leaders to align their interests, goals, and orientation with those of prospective supporters in order to pursue goals. According to Snow and Benford, these leaders “frame, or assign meaning to and interpret, relevant events and conditions in ways that are intended to mobilize potential adherents and constituents, to garner bystander support, and to demobilize antagonists” (1988: 198). Glenn explains movement outcomes as a function of how well frames forged new relationships between previously disparate practitioners and activists. For him, “framing plays an essential role not merely by persuading individuals to join a movement...
under favorable opportunities, but also by aligning the claims of challengers with the identities of preexisting [actors]” (Glenn 1999: 191).

Third, frames keep networks together. Frames provide a mechanism with which to bind the identities and interests of prospective supporters with new images, ideas, and beliefs of issues. Stone Sweet et al. argued that frames help policy entrepreneurs (or, in their words, “skilled actors”) to induce cooperation amongst disparate groups by helping to form stable conceptions of roles and identity (Stone-Sweet et al. 2001: 10). In short, frames align identities and interests in ways that encourage ongoing collective action. (See Rhinard 2010, which outlines how frames play a role in building networks of different sorts, ranging from loosely coupled issue networks to more tightly connected policy communities.)

**Wielding frames: institutional manipulation**

Frames assist actors in creating new institutions or altering existing ones by informing institutional choices in ways that appear to be legitimate responses to jointly perceived problems. In other words, frames provide heuristics for institutional change and justify change in ways that other participants find convincing and useful. Why is this important? In the medium- to long-term, institutional change within particular policy domains is arguably more important than individual policy reforms. Institutional changes “embed” perspectives and interpretive frameworks in the structure of a policy domain and shape outcomes over time.

Institutions are “the humanly devised constraints that shape human interactions” (North 1990: 3). They include the decision rules, administrative procedures, behavioral routines, and norms which pattern action within a particular policy domain. With frames in hand, entrepreneurial actors can make changes to the institutional structures guiding behavior within a domain. How do they do this? The literature on “new institutionalism” offers useful guidance on this count, in that rationalist, historical, and sociological institutionalisms allow for change in institutions under certain conditions (see Rhinard 2010 for a full discussion). Rationalists argue that institutional change is related to the flow of indirect effects of institutions – “feedback effects” – that strengthen or weaken the extent to which institutions are self-enforcing (Greif & Laitin 2004). Less prosaically, institutions represent dominant interests and serve functional purposes; when they cease to represent those interests, when interests change, or when institutions blatantly fail in their functions, opportunities open for change. Historical institutionalists emphasize institutional stability but recognize that external shocks or “critical junctures” take place during which the usual constraints on reform are lifted or eased. Major policy failures, external emergencies, or even groundswells of public discontent for certain policies can precede institutional change, from this perspective. Finally, sociological institutionalists consider a broad range of institutions, placing attention on non-codified, informal conventions and collective scripts that regulate human behavior. Scholars taking a “thin” approach to sociological institutionalism have considered how such conventions change, and suggest that new ideas and actors may unsettle dominant practices or scripts and impose their preferred alternatives. This version of institutionalism merges somewhat with the concept of policy framing, and although compatible, makes analysis difficult when considering the effect of frames on institutions. For that reason, institutions in a strategic framing approach are generally considered to be of the more formal variety: procedures, rules, standard operating procedures, etc.

Taken together, institutionalist approaches remind us that strategically placed entrepreneurs may seek to create and manipulate institutions to serve their interests. They will interpret external events and respond to internal crises by developing and propagating new frames which
appear convincing and useful. The link between frames and the manipulation of institutions has not been widely acknowledged, although several studies hint at the connection. Fligstein and Mara-Drita suggest that cognitive frameworks delimit the scope of possible institutional structures deemed necessary to address a problem (1996). In a similar vein, Surel suggests that the creation of new policy instruments and structures is “by no means a neutral decision; rather, it matches certain normative and practical imperatives” (2000: 498). Barnett uses similar terminology as that used here, including the concept of “strategic framing,” although he is focused on the way frames can be used to revise cultural institutions so as to make some groups’ policy claims appear more legitimate (1999). Frames provide the toolkit for institutional manipulation of one’s policy domain, making changes and reforms appear consistent and appropriate with a certain way of “seeing” an issue.

**Wielding frames: ideational alignment**

The final component of a strategic framing approach relates to the relationship between frames and the ideational framework within a policy domain. Hall reminds us that policymaking takes place not only within an institutional framework, but also within an “interpretive” or “ideational” framework (Hall 1989: 383; Hall 1993: 279; see also Schmidt 2008). This framework is organized into a hierarchical structure with general values and prevailing ideologies constraining more domain-specific policy ideas. Specific policy choices must be made to resonate or “nest” with broader values in order to gain support in the political process (Sikkink 1991). The argument here is that actors use frames to make these connections explicit, or, in other words, to “fit” their policy preferences with broader, societal values and a prevailing ideological climate.

Campbell’s work on the role of ideas and other cognitive factors in shaping political outcomes provides support for the argument. He argues that different ideas relate in a “hierarchically nested fashion” (1998: 399–400). Policy-specific ideas must fit with broader values, or broad-based attitudes and normative assumptions held by large segments of the population about what is or is not desirable. These values constrain the normative range of solutions that will be viewed as “legitimate” and “acceptable” by wider audiences. Only policy options which match broader frameworks stand a chance of succeeding. In concluding their studies of the success or failure of policy ideas in different national settings, Goldstein and Sikkink make a similar argument. Goldstein argues that the proposals which will receive support in the political process are those which are congruent with general values: “ideas that do not ‘fit’ well with underlying social values are unlikely to find support among political entrepreneurs and the attentive public” (1993: 12, see also 15). Likewise, Sikkink suggests that ideas must be congruent with common, shared beliefs “about the structure of ‘normal politics’” and “must ‘fit’ well with existing ideas and ideologies in a particular historical setting” (Sikkink 1991: 26; for a similar account, see Schmidt 2008).

Most importantly, Campbell argues, policy actors are responsible for making these connections intentionally. If policymakers perceive a policy idea to be viable and in-line with their preferences, it still “must fit with prevailing public sentiment. If it does not, then it must be framed so as to improve this fit” (2004: 400). How precisely do frames make this connection? In short, frames allow policymakers to combine policy options, specific and broad-based values, and interests in ways that appear reasonable and coherent to other elites and wider public elites alike. As investigated by social movement theorists, the “linking” utility of frames can be inferred in how movement organizers construct frames designed to attract supports to their cause. Tarrow argues that, in framing:
Organizers attempt to relate their goals and programs directly to the existing values and predispositions of their target public. They are thus in a certain sense both consumers of existing cultural meanings and producers of new meanings, which are inevitably framed in terms of organizers’ reading of the public’s existing values and predispositions.

(1992: 189)

Frames enable actors to draw together policy proposals with symbols, concepts, and discursive elements which reflect the values and opinions of mass publics. In a 1988 contribution which seeks to explain this relationship, Snow and Bedford claim that “frame resonance” represents a frame’s successful connection between a movement’s policy goals and “existing popular understandings” (1988: 199), a critical way for leaders to gain support for social movements. This suggests the importance of policy entrepreneurs as the motivated actors behind the creation of these linkages through frame mobilization.

Thus, to pursue policy change effectively, actors must be able to link policy choices to broader political values in ways that resonate and appear to “make sense” to other actors and the general public. Frames are critical because they make these linkages explicit; they encompass an “ideational package” of specific policy ideas and broader public values. In this way, frames empower actors by making their actions appear more legitimate, and related to wider, societal concerns.

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In sum, strategic framing provides a conceptual apparatus that helps to capture the complexities of modern policymaking, and which can integrate instrumental explanations of policy change with structural understandings of the effects of policy contexts. Using constructed frames, the arguments above set out, strategically oriented actors can help to shape networks, institutions, and ideational understandings in ways that orient outcomes in preferred ways. The next section explains why the European Union policy context provides a fruitful context in which to study strategic framing.

The European Commission and EU policymaking

Why is the European Commission well placed to be a “strategic framer”? This section reviews the qualities of the Commission – and the EU decision-making process more broadly – that place it in an opportune position to pursue its policy aims using the tactics discussed above. Namely, the Commission is characterized by organizational fragmentation, dispersed authority, and significant policymaking authority at the domain level. Such qualities are not unique to the Commission and the EU, of course; they describe many Western, democratic political systems (particularly federal systems like those centered in Washington, D.C., or Berlin). The goal of this section, simply, is to illustrate why the EU offers a rich empirical case for studies of strategic framing. Space constraints preclude a full detailing of specific cases, however; empirical examples of strategic framing can be found in Rhinard (2010).

The European Commission in the EU policy system

A full description of the institutions and processes of the EU policymaking system is available elsewhere (Buonanno & Nugent 2013), so here it suffices to focus on the Commission per se.
The Commission plays a central role in breathing life into the objectives and policies envisioned by the EU’s founding treaties. These provisions translate into roughly four main tasks of the Commission in EU policymaking.

First, the Commission initiates policy proposals in most EU policy areas. The right of initiative, codified in Article 17(2) of the Treaty on European Union (TEU), is a strongly protected Commission competence and supports many of its other roles. The normal legislative process typically is initiated by a unit within one of the policy-specific Directorates-General (DGs) in the Commission. From there, different DGs within the Commission are invited to comment on draft proposals and suggest revisions. Any conflicts not settled between the DGs are handled between the personal offices (cabinets) of the Commissioners. Only major conflicts are taken to the weekly College of Commissioners meeting, where all decisions are formally taken by the principle of collegiality (Hartlapp et al. 2014). Once a policy proposal is approved by the College of Commissioners, the “Communication” is sent to Council and in some cases the Parliament. Possessing the right of initiative puts the Commission in a central position in EU policymaking (with some caveats, explained below).

Second, the Commission mediates the policy process. It can participate in Council of Minister meetings as well as in the Council’s many working groups, where Commission proposals are initially scrutinized, and in the meetings of the Committee of Permanent Representatives (Coreper), where permanent diplomats from the member states prepare the agenda for Council meetings. The Commission’s presence during these negotiations is a by-product of its right of initiative, and allows it to explain and shepherd its proposals. The Commission can thus mediate between diverging national positions and views in order to help find consensus. In the Parliament, the Commission is called upon to explain itself and encouraged to make amendments. The Ordinary Legislative Procedure (OLP, formerly, “co-decision”) applies to most EU policy competences, and involves the use of conciliation committees to reconcile differences between the institutions. Here the Commission can engage in “integrative bargaining” (Young 1991) and further pursue its own interests (but cf. Burns 2004; Wonka 2007).

Third, the Commission is responsible for implementing most legislative acts. There are two types of implementation. The first is the making of administrative laws required to adjust existing legislative acts. This role falls upon the Commission, and allows for its own power of decision in areas where the Treaty has granted that right (competition policy, customs policy, agricultural decisions, etc.) as well as where the Council has delegated that right. The Council’s delegation of implementation authority is required when legislative acts must be adjusted to technical progress or when changing circumstances demand small alterations to existing law. The need to fix agricultural prices or take punitive measures against imports are examples of the Commission’s right to take implementing decisions through delegated and implementing acts, formerly known as “comitology” (Rhinard 2002).

Fourth, the Commission plays a role informally known as the “guardian of the treaties.” The first paragraph of Article 17 (TEU) states that the Commission “shall ensure the application of the Treaties, and of the measures adopted by the institutions pursuant to them. It shall oversee the application of Union law.” When the Commission suspects that the treaties, or the laws based on the treaties, have not been respected, it may decide to initiate infringement proceedings. The Commission must follow procedures set out in the treaties, including notification, providing an opportunity for rebuttal, further justification of the action to be taken, and then if necessary, taking the case before the Court of Justice for restitution.

The four tasks of the Commission within the EU political system place it in a central, but not necessarily privileged, position to influence policy. There are numerous factors acting against
the Commission’s effort to shape policymaking in the EU, the most significant of which is member state preferences. Even acting in the most “strategic” of ways, the Commission is not likely to have much success if a majority of governments object to a particular, collective agreement. This is true for the policy initiation stage, when although the Commission is always free to make proposals, it is only likely to do so when it perceives a chance of achieving success. It is also true for implementation phase, when even a successfully adopted common policy may face resistance as member states delay transposition and implementation.

The importance of member state preferences is real, and plays a major role in determining EU outcomes (Moravcsik 1998). But it should not be overstated for several reasons. One is that EU policymaking is a long, involved process that takes place over the course of years rather than months (see Nugent & Rhinard 2015). Many proposals tabled by the Commission receive very little initial support, only to gain credence over time, or when a policy shock or crisis demands a response (Sabatier & Jenkins-Smith 1993). Another is that Commission preferences remain fairly steady over time while member state preferences vary. The latter may change form following elections, when, for instance, a center-left government is replaced by a center-right government. New political constellations in the Council can therefore create new opportunities for common policy solutions once thought impossible. In general, the Commission knows that it is “in for the long haul” – to encourage policy change over periods of time, sometimes through gradual means that aim to shape the very context in which policymaking takes place. In this environment, strategic framing can be well suited to policy officials’ ambition to manipulate policy domains in favorable ways.

Organizational fragmentation

More specifically, what makes strategic framing a useful analytical approach when studying the Commission? One is its organization. The Commission is a complex creature in which driving policy change is rarely straightforward. Consider the split between the political and administrative levels in the Commission. The political level is represented by Commissioners, nominated by member states in accordance with the Commission President-elect, who is appointed by qualified majority in the European Council. Commissioners, in the form of the “College,” must, according to the treaties, act collegially and independently from national governments. The principle of collegiality requires each to have an overview of Commission competences beyond their individual portfolios. The independence of the Commissioners stems from their appointment, since the founding treaties state that the Commission “shall be completely independent” (Article 17, TEU). Historically, holding the Commission together in a unified manner can be difficult since individual Commissioners can build their own informal power bases (Nugent & Rhinard 2015).

Under the College, the Commission’s administrative bureaucracy is further fragmented, divided into departments, some of which provide horizontal services across the Commission, but most of which are policy specific. There are currently thirty-three DGs (directorates-general) ranging from DG Home Affairs to DG Energy and DG Transport. This does not include central services, such as the Secretariat General of the Commission, nor the many agencies, both internal to the Commission (e.g., the Joint Research Centre) or the quasi-autonomous agencies which have emerged in recent years (e.g., the European Centre for Disease Prevention and Control). Each policy-specific DG is headed by a Director-General, who is the administrative counterpart to the responsible Commissioner. Every DG is divided into several directorates, and further into many units. It is at the unit level where most legislative proposals are drawn
up, where most consultation with “stakeholders” takes place, and where networks are built to support new ideas. Combined with the absence of clear hierarchies (see next section), fragmentation creates an environment in which drawing disparate actors across directorates and across organizations is paramount.

**Dispersed authority**

These networks usually cross institutional boundaries, which leads to another aspect of the Commission’s organization relevant to strategic framing: the dispersed nature of authority. This quality characterizes the EU as a whole, in fact. The EU lacks a central authority in which decision-making responsibility ultimately lies, as would be the case in parliamentary systems in which a majority forms a government to carry out a policy platform (Page 1997). Instead, the EU resembles a quasi-federal system in which multiple, evenly balanced governmental branches share power. No single branch can mobilize authority derived from an indisputable “sovereign.” Power is shared and must be exercised in ways that combine formal and informal resources in the pursuit of interests (Nugent & Rhinard 2015). In such systems, it is “the relationship involved in committees, the policy community of departments and groups, the practices of co-option and the consensual style that perhaps better account for policy outcomes than do examinations of party stances, of manifestos or of parliamentary influence” (Richardson & Jordan 1979: 73–74). Stakeholders seeking policy change or defending existing policies appreciate that interests cannot be pursued unilaterally; they know that “collaboration may be the best means of extending the Pareto boundary to mutual advantage” (Richardson 1996: 36). Collaboration takes place in the form of different kinds of horizontal networks linking actors together, and doing so not because of hierarchies but because of “resource dependencies” (Rhodes 1997). In short, mobilizing policy change in such systems requires forming supportive coalitions of actors across institutions and organizations. Here, techniques of strategic framing, as argued above, can help to create, operate, and sustain these essential networks.

The Commission itself is characterized by a certain degree of dispersed authority, too. Traditionally, the Commission has lacked a strong center, with the Commission President acting as a “primus inter pares” and the Secretariat-General playing a loose coordinating role (Patterson 1997). Policy coordination mechanisms were fairly rare (Rhinard 2010) and competition between units and directorates was rife. Central oversight has improved in recent years, however, thanks to formalization of the Commission’s Work Programme, the advent of Strategic Planning and Programming, and a more assertive Secretariat-General (Nugent & Rhinard 2015). Yet, sufficiently motivated and networked directorates within the Commission can use a variety of techniques to bring external pressure to bear on internal processes, and to appeal to changes in broader societal values. Here, strategic framing can play a useful role.

**Domain level activity**

In the EU, policy ideas emerge from many sources but are almost always initiated at the domain level. As discussed above, a policy domain is a policy-specific, quasi-autonomous space in which actors gather to deliberate policy change. Domains are also structured by institutions within which policymaking is considered, changed, and implemented. Such institutions include procedural rules and norms, consultation styles, policy instruments, and funding mechanisms. Finally, domains are characterized by an ideational way of viewing a policy problem and the goals of policy. All this makes the domain an essential analytical focus, not least in the EU. Policy change starts at the domain level, when unit-level actors begin
the process of consultation, deliberation, and writing. Against the backdrop of poor coordination and dispersed authority, power resides in these domains and amongst the actors that populate them. This was particularly true for biotechnology policy in the 1990s, when a new domain was constructed in order to address a new kind of policy question. Then, competition was rife over how the construction of the domain would take place, and strategic framing became a key technique (Rhinard 2010). Similarly, the counter-terrorism domain, while pre-existing September 11, 2001, underwent a significant “renovation” following terrorist attacks. Understanding outcomes in the EU, in short, requires focusing on the high degree of activity taking part in domains.

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In short, the Commission’s role within the EU policy process – its core tasks, its organizational characteristics, and its formal and informal resources – make it a prime candidate for analysis using a strategic framing approach. A note of caution is in order, however. Strategic framing suggests a high degree of intentionality, but strategic framing may not play out as intended. Not only does the overall political climate, discussed above, play a role, but competition with other strategic framers (even within the same organization, as has been documented in the EU, Rhinard 2010) can block preferred outcomes. Furthermore, policy coordination has tightened in recent years (Nugent & Rhinard 2015), meaning that strategic framing can be disrupted or blocked in ways that initial proponents did not expect. Nevertheless, recent policy reform and innovation drives, in which new ideas require interpretation and implementation, suggest the practices associated here with strategic framing are very much still relevant.

Conclusion

Strategic framing offers a conceptual apparatus for the study of policy outcomes in complex, fragmented organizations with diffused sources of authority. Its contribution lies in specifying the development of frames followed by their intentional “wielding” in domain-level restructuring efforts. Namely, the approach argues that frames provide a signaling device for the construction and maintenance of coalitions in complex and fragmented policy processes. As regards institutions, frames offer heuristics and justification for the construction and/or manipulation of institutions which shape the policymaking process. Finally, with respect to ideational alignment, frames prove helpful to actors in aligning new policy initiatives with broader societal themes and values.

Mobilized effectively in these three ways, frames become “embedded” in a policy domain and have the ability to influence policymaking far into the future. For example, when actors use frames to build coalitions, they are attracting new actors and reshaping old actor configurations. Once formed or reformed, those coalitions become carriers for that policy frame (Thatcher 1998). In the case of frames and institutions, frames inform the creation or manipulation of institutions in ways favorable to the mobilizing actor’s interests. Once those new institutions are in place, they heighten the influence of that frame by giving it organizational support and means of expression (Tolbert & Zucker 1996). And in the case of ideational linkages, frames are used by actors to align policy choices with broader values. If this connection is made with success, i.e., with coherence between cognitive levels, the frame may achieve lasting stability and continuity in the domain (Barletta 2001). This is consistent with, but adds analytical precision to, claims that over time that frame may assume a “taken-for-granted” status (Schmidt 2008).
This chapter also discussed the role of the European Commission in the EU policy process, as a prototypical example of an actor holding certain resources, and operating within a particular organizational environment, which makes it well suited to act entrepreneurially as a strategic framer. Much policymaking originates and takes place at the domain level, authority is fairly dispersed, and central coordination has been problematic. Strategic framing becomes a useful tactic in such environments, in that it seeks to shape a domain’s networks, institutions, and ideas in ways that privilege certain policy outcomes. It sheds light on the entrepreneurial practices employed by the European Commission in provoking policy change in the EU. Understanding the resources, strategies, and tactics available to the Commission, particularly when assessed against the strength of twenty-eight powerful member state governments, is critically important for understanding the policy dynamics of European governance.

References


Strategic framing and European Commission


